

72155-70

03/26/2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Anriette Bloomberg
Bayer Advanced
2 T W Alexander Drive
Research Triangle Park, NC 27709

MAR 26 2013

Subject: **Notification:** Minor label modifications including adding a total of 100% to the ingredients, deleting two marketing claims, and changing pen directions to syringe directions
Imidacloprid 2.15 RB Insecticide
EPA Reg. No. 72155-70

Dear Ms. Bloomberg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated March 11, 2013, for the product EPA Reg No. 72155-70. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the label revisions requested fall within the scope of PRN 98-10. The label submitted has been stamped "Notification" and will be placed in our records. If you have any questions, please contact me at 703-347-0156 or urbanski.jennifer@epa.gov.

Sincerely,

Jennifer Urbanski, Ph.D.
Insecticide-Rodenticide Branch
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72155-70	2. EPA Product Manager John Hebert	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Imidacloprid 2.15 RB Insecticide	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) Bayer Advanced 2 T W Alexander Drive Research Triangle Park NC 27709 <input type="checkbox"/> Check if this is a new address.	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

See Section II Explanation Attached

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted			If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt
					No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Annette M. Bloomberg		Title Registration Manager		Telephone No. (Include Area Code) 919-549-2608	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Annette M. Bloomberg</i>		3. Title Registration Manager			
4. Typed Name Annette M. Bloomberg		5. Date March 11, 2013			

Section II - Explanation

Bayer Advanced is submitting a label **Notification** for **Imidacloprid 2.15 RB**, EPA Reg. No. 72155-70, in accordance with PR Notice 98-10.

The purpose of this Notification is to make the following changes to the label:

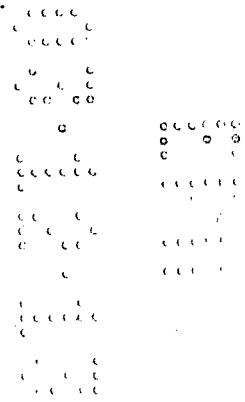
1. Page 1
 - a. Corrected the typo, weather should be whether.
 - b. Deleted the claim "Push Button POWER PEN makes it easy"
 - c. Deleted the claim "enough to treat an entire house"
 - d. Added Net Weight : 20-60 grams
 - e. Added TOTAL.....100% to the label

2. Page 2
 - a. Add the text "or visit us on-line at www.BayerAdvanced.com to the Quick Facts section.
 - b. Added the phone and computer icons to the Quick Facts section.

3. Page 3, Changes in the "Directions for Use" section.
 - a. As stated in PR Notice 98-10, changes to the Directions for Use are permitted by Notification for "Addition of similar application method." The delivery system has been changed from a "pen" to a "syringe." The new method of delivery does not change the dose, concentration, or exposure. The changes to the label are as follows:
 - i. In the HOW TO APPLY row, replaced "Push and turn cap to remove" to read "Remove cap from tip"
 - ii. 2nd bullet in the HOW TO APPLY row was changed to read "Place tip of syringe against area to be treated, depress the plunger."
 - iii. 3rd bullet in the HOW TO APPLY row was deleted.
 - iv. In the FOR BEST RESULTS row, removed the 2nd bullet "For thorough control, use entire tube at one time."

4. Page 4, Updated Storage and Disposal Area
 - a. Added the word "PESTICIDE" to the storage and disposal table heading.
 - b. Added the word "Pesticide" to the Storage Conditions and Disposal rows.
 - c. Added the text "To the extent consistent with applicable law, the" in the Notice section.
 - d. Added PRODUCED FOR at the bottom of the page.

Enclosed are 3 copies of the product label (two clean copies and one copy with all changes highlighted in yellow).



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Imidacloprid 2.15 RB Insecticide
EPA Reg. No. 72155-70
Notification
March 11, 2013

Page 2 of 2

This notification is consistent with the provision of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

NOTIFICATION

MAR 26 2013

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Highlighted Copy

[FRONT PANEL]

NOTIFICATION

MAR 26 2013

Imidacloprid 2.15 RB Insecticide

READY-TO-USE

- Effective performance
- The lethal roach killer
- Kills roaches fast before they multiply
- Provides long term control
- Controls roaches at their source
- Kills the source of the roach problem
- Continuous action for [a]round the clock protection
- Works every minute of every hour of every day
- Works on roaches day and night
- Works continuously, [24 hours a day.] [7 days a week] [24/7]
- Works day after day/ works day and night
- Works on roaches while you sleep
- Works on roaches while you are away
- Kills/stops/destroys roaches before they become a problem
- Preventative maintenance against roaches
- Treat your roaches to their last meal
- Stays moist and attractive for months
- Roach food and water source
- Easy to use
- Overnight results
- Very attractive to roaches, so they die fast
- Kills roaches hiding in cracks, crevices, cabinets, and & other areas.
- Kills the roaches where they hide/breed/live
- Ideal for kitchen use
- Kills roaches whether they eat the bait or share it.
- Kills all major types of roaches
- Easy to apply
- Stays in place
- Stays where you put it
- For hard to reach places such as cracks and crevices
- Easy to clean-up
- No odor / No mess
- No fumes or vapor
- Non-oily
- Innovative, fast-acting – or – fast-action formula that quickly kills roaches
- Kills roaches quickly
- Starts killing roaches in hours
- [Delivers] fast killing results
- Starts killing in hours and keeps on killing
- Quick kill formula
- Fast action – or – acting formula
- Dual action – attracts and kills
- Dual action formula– attracts and kills
- Double action – attracts and kills
- Double action formula– attracts and kills
- 2-in-1 formula – attracts and kills
- No unsightly brown gel/residue (color)
- Even controls hidden cockroaches
- Kills large and small roaches
- Kills all common roaches
- Patented formula – or - ingredient
- Contains the active ingredient in Merit®
- White Gel
- Up to 6 months protection (or until bait is fully consumed)

ACTIVE INGREDIENT:

Imidacloprid 2.15%

OTHER INGREDIENT:

..... 97.85%

TOTAL

..... 100%

Net Weight: 20-60 grams

KEEP OUT OF REACH OF CHILDREN


CAUTION

See back panel for additional precautionary statements and First Aid

[BACK PANEL]

Imidacloprid 2.15 RB Insecticide provides a better way to control household roaches. This easy-to-use formula quickly attracts hidden roaches without any odor or oily mess. Controlling roaches in and around your home has never been easier.

READ THE LABEL FIRST!

Quick Facts	
<ul style="list-style-type: none"> • Very attractive to roaches so they die fast! • Kills roaches in cracks, crevices, cabinets, and wall voids • Easy to apply – no odor / no mess 	
KILLS	Cockroaches, including German, American, Smokybrown, Oriental and other species
WHERE TO USE	Areas cockroaches seek food, water, or shelter. Areas cockroaches travel. For example, Kitchens, Bathrooms, Laundry rooms, Basements, Garages, Outdoor areas.
WHEN TO USE	When cockroaches are present
	For questions or comments, call toll-free 1-877 BayerAG (1-877-229-3724) or visit us on-line at www.BayerAdvanced.com

ACTIVE INGREDIENT:

Imidacloprid 2.15%

OTHER INGREDIENT: 97.85%

100.00%

EPA Reg. No. 72155-70

EPA Est. No. XXXX-AA-XX

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION


- Causes moderate eye irritation.
- Avoid contact with eyes, skin or clothing
- Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco.

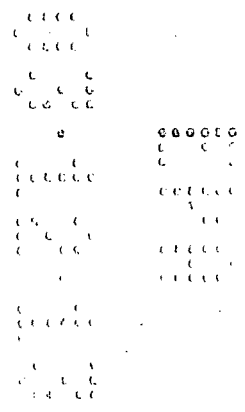
First Aid +

neonicotinyl Insecticide

If in eyes	Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If swallowed	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.


NOTE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 877-229-3763 for emergency medical treatment information. Active Ingredient: 2.15% Imidacloprid [CAS # 138261-41-3]

DIRECTIONS FOR USE	
<p>It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, be sure to read and follow all label directions.</p>	
<p>BEFORE YOU USE</p> <p>Read and follow these directions when using:</p>	<ul style="list-style-type: none"> • Apply only to areas not easily accessible to children and pets. • Avoid applying gel to fabric or carpeting, as it may stain some materials. • Do not apply in or on electrical equipment due to the possibility of shock. • Gel cleans up easily with damp paper towel while still wet, or scrap away with putty knife once dry. Discard the clean-up debris.
<p>WHERE TO USE</p>	<ul style="list-style-type: none"> • Kitchens - Cupboards, Dishwashers*, Garbage Cans, Refrigerators*, Stoves*. • Bathrooms - Bathtubs*, Garbage Cans • Laundry Rooms - Drains, Laundry Tubs*, Washing Machines* • Basements, Garages, Outdoor Areas - Drains, Garbage Cans, Laundry Tubs*, Manholes, Pipe Collars, Sewers, Washing Machines*, Water Pipes* • General - Cabinets, Closets, Counters, Cracks, Crevices, Shelving, Sinks <p>* Do not apply bait inside these items. Locate behind or under item.</p>
<p>HOW MUCH TO APPLY</p>	<ul style="list-style-type: none"> • Spot Treatment: 1 – 2 spots per square yard, each spot ¼" across. • Crack and Crevice Treatment: Squeeze a small amount into crack or crevice. • Recommended spot size [graphic] 
<p>HOW TO APPLY</p>	<ul style="list-style-type: none"> ○ Remove cap from tip ○ Place tip of syringe against area to be treated, depress the plunger ○ When finished, replace cap
<p>FOR BEST RESULTS</p>	<ul style="list-style-type: none"> • Numerous, smaller bait placements will provide faster more effective control than fewer larger placements. • Gel should be applied to clean, dry surfaces. • If bait is completely eaten, reapply more to the same site since additional roaches will be attracted by the secretions and droppings left by the earlier cockroaches. • Do not apply roach baits to areas recently sprayed with insecticides and do not spray insecticides over these baits. The spray insecticides may repel roaches from the baited area.
<p>HOW IMIDACLOPRID 2.15 RB INSECTICIDE WORKS</p>	<p>This bait was specifically formulated to be both a food and water source with extra long attractiveness. It contains a low level of insecticide which cockroaches cannot detect.</p>



PESTICIDE STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage Conditions:	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
Pesticide Disposal: 	If Empty: Non-refillable container. Do not refill or reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or call 1-877-229-3724 for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE

Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Imidacloprid 2.15 RB under expected conditions. To the extent consistent with applicable law, the Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

PRODUCED FOR



A Business Unit of Bayer CropScience LP
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709

Imidacloprid 2.15 RB (Master) Approved 11/13/06, Notification 08/28/08, Pending Notification 02/26/2013

