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US ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave NW Washington DC 20460 EPA Reg Number

Date of Issuance

73079-14

AUG - 9 2012

NOTICE OF PESTICIDE

X Registration

Reregistration (under FIFRA as amended)

Term of Issuance

Conditional

Name of Pesticide Product

Imidacloprid Granular Bait

Name and Address of Registrant (include ZIP Code)

Rockwell Labs, Ltd 1257 Bedford Ave North Kansas City, MO 64116

Attn Dr Cisse W Spragins

Note Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number

On the basis of information furnished by the registrant the above named pesticide is hereby registered under the Federal Insecticide Fungicide and Rodenticide Act

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you

- Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data
- 2 Make the following label changes before you release the product for shipment
 - Revise the EPA Registration Number to read, "EPA Reg No 73079-14"

Signature of Approving Official

Date

AUG - 9 2012

Venus Eagle, Product Marager 01

Insecticide-Rodenticide Branch, Registration Division (7505P)

EPA Form 8570 6

- Throughout the label, all references to "ants," including any marketing claims, must be revised to read, "ants*," with the asterisk referring to text that reads, "except carpenter, fire, pharaoh, and harvester ants"
- 3 Submit one copy of your final printed labeling before you release the product for shipment

Please note that should you wish to add/retain a reference to the company's website (i.e., www rockwelllabs com) on your label, then the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E) 40 CFR 156 10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website may be referred to the EPA's Office of Enforcement and Compliance Assurance

A stamped copy of the label is enclosed for your records Please also note that the record for this product currently contains the following CSFs

- Basic CSF, dated 7/5/12
- Alternate CSF #1, dated 7/5/12

Your release for shipment of the product constitutes acceptance of the above conditions. If the conditions above are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Julie Chao at 703-308-8735 or chao julie@epa gov

Venus Eagle Product Manager 01 Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

Bold italicized text is information for the reader and not part of the label [Bracketed information is optional text] Text separated by / denotes and / or options

Imidacloprid Granular Bait

Kills Roaches, Ants*, Crickets, Mole Crickets, Silverfish, Firebrats, and Earwigs *Except Carpenter, Fire, Pharaoh and Harvester Ants

Active Ingredient Imidacloprid 0 5% Other Ingredients 99 5% Total 100 0% EPA Reg No 73079-xx EPA Est No (as applicable)

Net Wt 8 oz, 1 lb, 2 lb, 3 lb, 4 lb, 5 lb, 10 lb, 20 lb, 40 lb

ACCEPTED
With COMMENTS
In EPA Letter Dated
AUG - 9 2012

Under the Federal Insecticide Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No.

Stop – Read Label Before Use _______

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals CAUTION Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

FIRST AID

IF IN EYES -Hold eye open and rinse slowly and gently with water for 15 20 minutes Remove contact lenses, if present, after the first 5 minutes, then continue rinsing Call a poison control center or doctor for treatment advice

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 800 858 7378 for emergency medical treatment information.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to birds and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters.

[NOTICE Buyer assumes all responsibility for safety and use not in accordance with directions]

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Personal Protective Equipment (PPE)

There are no specific requirements for applicators or other handlers, however the following is recommended at a minimum

Short sleeved shirt and long pants

Shoes plus socks

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling

Use Sites In and around structures, including homes, apartments, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, transport vehicles, sewers, animal research facilities, and food service, storage, handling and processing establishments. Turf sites include lawns, landscape beds, ornamental turf, parks, playing fields, right-of-ways, golf course greens and tee boxes, and home greenhouses.

[How It Works Roaches, crickets, silverfish, firebrats, and earwigs discover the bait while foraging and eat it and die Worker ants cannot eat solid food, so they pick up the bait and take it back to the nest and feed it to the larvae The larvae digest solid food and excrete liquid food for the rest of the colony]

Outdoor Perimeter Application Apply bait at a rate of 1/2 - 1 oz (2 - 4 tablespoons) per 100 square feet Use a hand shaker, duster or mechanical spreader to apply the bait Apply in a band from 1 - 3 feet wide around the perimeter of buildings For example, a 2 foot band around a 200 linear foot building would require 8-16 tablespoons (1/2-1cups) of bait Also apply around exterior light fixtures and along the edges of sidewalks, patios and driveways and under decks Pay particular attention to potential insect harborage sites such as mulch beds, flowerbeds, fruit and vegetable gardens, compost heaps, wood piles, trees, stumps and trash areas and apply bait at the more liberal application rate in these areas In home greenhouses, apply bait on and under benches Do not apply bait directly in flats or pots Pets may be attracted to this product. Do not pile the bait in exposed areas The bait may also be sprinkled in and around rodent bait stations to control insects that harbor in these stations. When treating for ants, apply ½ to 1 oz of bait around ant mounds and sprinkle along foraging trails For ants, including Carpenter ants, pay particular attention to harborage areas and apply bait around trees and stumps, in tree cavities, in and around firewood piles, around landscaping stones and in mulch beds Ants can take the bait back to the nest and kill the colony Bait may also be applied in insect bait stations Reapply bait after one week if infestation is still present To prevent large insect populations from developing around structures in warm months, a quarterly application around the perimeter and to harborage areas, as described above, is recommended This treatment is particularly effective to help prevent the establishment of large colonies of pest ants If the perimeter is treated with a repellent insecticide (eg pyrethroid), the bait may still be used around the perimeter, but it should be applied in a

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band outside the repellent barrier for best results. As a separate matter from the use of this product, as part of an IPM program, it is recommended that overhanging trees and other vegetation touching the structure be trimmed back, and cracks or gaps around pipes and window and door frames be sealed to minimize potential insect entry into buildings

Turf Application Apply bait evenly over the affected area using a hand shaker or mechanical spreader at a rate of 4-8 oz per 1000 square feet or 10-20 lbs per acre. The product should not be watered in For mole cricket treatments, results will be best if the area is irrigated prior to bait treatment. Mole crickets typically come to the surface to feed in the evening

Sewer Application Apply bait at a rate of 1 oz per 100 square feet along ledges inside sewers and around manhole covers

Indoor Application Apply bait only in areas inaccessible to children and pets, or in tamper-resistant bait stations. Use a hand shaker or duster to apply bait. Apply up to 0.5 oz (2 tablespoons) per crack, crevice or void, or at a rate of 0.5 oz (2 tablespoons) per 100 sq. ft. Trash closets, utility closets, dropped ceilings, under and behind appliances and vending machines, in wall voids and voids under and behind cabinets, sinks and tubs, in drawer wells, garbage chutes, pipe chases, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen. Reapply bait after one week if infestation is still present. The bait may be broadcast in unfinished attics, basements and crawlspaces provided children do not have access to these areas.

Application tips for certain sites follow

- 1 In attics, be sure to get bait near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure. Attics should have proper ventilation to insure that no food odor from the bait seeps into the living area, particularly in hot weather. If in doubt, apply the product in a manner such that it can be easily removed
- 2 When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids Escutcheon plates around pipes can also be pulled back to allow access to voids
- 3 The bottom drawers in kitchen and bathroom cabinets can be removed and bait dusted into drawer wells. No bait should be left exposed when drawers are replaced
- 4 Electrical switch plate covers can be removed to allow access to voids, but bait shouldn't be applied directly in electrical boxes
- 5 If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with bait. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems
- 6 Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary As a separate matter from the use of this product, as part of an IPM program, it is advisable to fix any leaks to minimize structural damage and odors, and to prevent potential chronic insect problems

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Food Processing and Handling Establishments, Including Federally-Inspected Food Plants In food areas, including serving areas while the establishment is in operation, only apply bait in cracks, crevices, and other inaccessible areas, or in tamper-resistant bait stations. Never apply bait directly to a surface where food is stored, prepared or served. Follow above directions for crack and crevice placement.

STORAGE AND DISPOSAL

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

Pesticide Storage Store in a dry place Do not store where children or animals may gain access

For 5 lb, 10 lb, 20 lb and 40 lb containers

Container Handling Non-refillable container If empty Do not reuse or refill this container Place in trash or offer for recycling if available If partly filled Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership

For 8 oz, 1 lb, 2 lb, 3 lb and 4 lb containers

Container Handling This storage/application container may be refilled by the end-user of the product. Do not refill with anything other than Imidacloprid Granular Bait. Do not reuse this container for anything other than Imidacloprid Granular Bait storage/application. If empty. Place in trash or offer for recycling if available. If partly filled. Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.

[Warranty Limitations and Disclaimer

To the extent consistent with applicable law, seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. To the extent consistent with applicable law, there are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, manufacturer shall not be liable for any consequential damages based on the use of the product [

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MARKETING CLAIMS

[Contains no peanut products]

[For Indoor and Outdoor Use]

[For Indoor Use]

[For Outdoor Use]

[For Turf Use]

[For Indoor, Outdoor and Turf Use]

[Ready-to-Use Bait]

[Multiple [food] attractants]

[Contains sweet / sugar, oil / grease, and protein]

[Guaranteed to work or your money back]

[Made in [the] USA]

[Kılls German, American, Oriental and Smoky Brown cockroaches]

[Roaches begin dying in 24 hours]

[Kills Acrobat, Allegheny, Argentine, Big-headed, Cornfield, Crazy, Ghost, Little Black,

Odorous House, Pavement, Pyramid, Rover, Thief and White-footed ants]

[Kills sweet / sugar and grease / protein eating ants]

[Kills sweet, grease / oil, and protein eating ants]

[Uses multiple food sources to kill ants]

[Kills the colony]

[Kills the ants you see and the ones you don't]

[Kills ants where they hide / breed]