

73079-14

11/27/2012

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Cisse Spragins
1257 Bedford Ave.
North Kansas City, MO 64116

NOV 27 2012

Subject: **Notification:** Addition of Alternate Brand Names "Invict Xpress Granular Bait", "Invict Blitz Mega Colony Bait" and "Invict Blitz Ant Granules"; addition of non-public health pest ants; removal of carpenter ants
Imidacloprid Granular Bait
EPA Reg. No. 73079-14

Dear Dr. Spragins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated October 15, 2012 for the product EPA Reg No. 73079-14. 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.

The alternate brands name "Invict Xpress Granular Bait" and "Invict Blitz Ant Granules" are also acceptable and will be added to our files.

The alternate brand name "Invict Blitz Mega Colony Bait" is not acceptable. The term "mega colony", when applied to ants, indicates distant colonies, even on different continents, that are genetically related. As applying the product to one colony will not affect a distant colony, the proposed brand name is misleading and indicates heightened efficacy.

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



EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 73079-14	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Rockwell Labs Ltd / Imidacloprid Granular Bait	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) 1257 Bedford Ave North Kansas City, MO 64116 <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 _____	NOTIFICATION NOV 27 2012
<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 attached letter. This notification is consistent with PR Notice 98-10 and the requirements of 40 CFR 156.10 and 40 CFR 152.46 and no other changes have been made to the label or Confidential Statement of Formula for this product. I understand it is a violation of 18 U.S.C. Section 1001 to willfully make a false statement to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 98-10 and the requirements of 40 CFR 156.10 and 40 CFR 152.46, this product may be in violation of FIFRA and may be subject to enforcement action and penalties provided under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input checked="" type="checkbox"/> Other (Specify: cardboard)	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8 oz, 1 lb, 2 lb, 3 lb, 4 lb, 5 lb, 10 lb, 20 lb, 25 lb, 40 lb		5. Location of Label Directions _____	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued 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 Cisse W. Spragins, Ph.D.	Title CEO	Telephone No. (Include Area Code) 816 283 3167
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 		
3. Title CEO		
4. Typed Name Cisse W. Spragins, Ph.D.		5. Date 10/15/12

NOTE:

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

ABNs: InVict™ Xpress™ Granular Bait and InVict™ Blitz™ Ant Granules

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, 25-lbs, 40 lb

Manufactured by: Rockwell Labs Ltd (logo)
North Kansas City, MO 64116
[Questions, Comments or Medical Information?
Call _____
/www.rockwelllabs.com]

[InVict / Xpress / Blitz / and Creating the Future of Pest Control are trademarks of
Rockwell Labs Ltd.]

[©XXXX][Rockwell Labs Ltd]

Stop – Read Label Before Use
KEEP OUT OF REACH OF CHILDREN
CAUTION

NOTIFICATION
NOV 27 2012

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.

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

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 – 1 cups) 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 1/2 to 1 oz of bait around ant mounds and sprinkle along foraging trails. For 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

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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 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.

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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.

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 10 lb, 20 lb, 25 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, 4 lb, and 5 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]
- [Kills 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]
- [Kills Caribbean and Rasberry Crazy Ants, Argentine and Big-headed Ants]