

2/12/2014

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



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Envincio LLC
c/o Leanne Pruett
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

FEB 12 2014

Subject: Amended label to clarify perimeter treatments
Products: Equil Adonis 4F Insecticide
EPA Reg. No. 87276-10

Dear Ms. Pruett:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. See 40 CFR 156.10(a)(6).

Under 40 CFR 152.130(d), EPA may establish dates by which all product distributed or sold by the registrant must bear revised labeling. The following paragraphs set forth the schedule for ensuring that that your product bears revised labeling within a reasonable time period.

- Any product released for shipment after 2/28/14 must bear the new label.

If these conditions are not complied with, EPA will take appropriate action against this registration. If you have any questions please contact Autumn Metzger at 703-504-5314 or metzger.autumn@epa.gov.

Regards,

A handwritten signature in black ink that reads "Venus Eagle".

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

ACCEPTED

FEB 12 2014

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

Note to reviewer: Brackets [] denote optional language

Equil Adonis 4F Insecticide

EPA Reg. No.

87276-10

For [effective] control of [ants (except carpenter, harvest, fire or pharaoh ants)] ~~[[darkling beetles]]~~
[lesser mealworms]] [and] [hide beetles] in and around poultry [[housing] [structures] [facilities]
[buildings] [barns]].

Contains imidacloprid, the active
ingredient used in Credo®.

- [Selected optional label claims]

ACTIVE INGREDIENT

Imidacloprid; 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 40.4%

OTHER INGREDIENTS: 59.6%

TOTAL 100.0%

Contains 4 lbs. of active ingredient per gallon

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este product hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

FIRST AID

IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> • 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF IN EYES:	<ul style="list-style-type: none"> • 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 ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison central center or doctor, or going for treatment. You may also contact 1-866-257-4118 for emergency medical treatment information.

NOTE TO PHYSICIAN: No specific antidote is available. Treat the patient symptomatically.

See inside label booklet for additional PRECAUTIONARY STATEMENTS.
For Chemical Spill, Leak, Fire, or Exposure, Call: CHEMTREC 1-800-424-9300
For Medical Emergencies Only, Call: 866-257-4118

EPA Reg. No. 87276-10

EPA Est. No.

Manufactured for:

Envincio LLC
2155 West Croft Circle
Spartanburg, SC 29302

Equil Adonis 4F Insecticide is not
manufactured or distributed by Bayer
Healthcare, LLC.

Net Contents: _____ [fl. oz.][gal.]

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if inhaled. Harmful if swallowed. Causes moderate eye irritation. Avoid breathing spray mist. Avoid contact with eyes or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash before reuse. Keep children or pets away from treated area until dry.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All pesticide handlers (mixers and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material. After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes must be worn.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters. Apply this product only as specified on this label.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the Agency responsible for pesticide regulation.

[[DARKLING BEETLE] [LESSER MEALWORM]] [AND HIDE BEETLE] CONTROL IN AND AROUND POULTRY [[HOUSING] [STRUCTURES] [FACILITIES] [BUILDINGS] [BARN]]

Use this product as a general surface, spot, or crack and crevice treatment to floors, walls and support beams of [[poultry] [turkey] [caged egg layer] [breeder]] [[housing] [structures] [facilities] [buildings] [barns]].

Restrictions

- **Do not apply when birds are present.**
- Cover or remove exposed feed and water from the area to be treated prior to application
- Do not allow food or feed to be contacted by the spray
- Allow treated surfaces to dry before restocking/reintroducing [[birds] [animals]] into the [[house] [structure] [facility] [building] [barn]].
- Do not apply more than 7 days prior to bird placement
- Do not allow people or pets into the immediate area during application, or contact with treated areas until spray has dried.
- Interior applications for ant control are limited to spot, crack and crevice, or wall void applications only.
- Do not use this product against native or imported fire ants, carpenter ants, harvester ants or pharaoh ants
- For perimeter spray, do not allow this product to contact plants in bloom if bees are foraging the area

- For perimeter spray, do not apply this product, by any application method, to linden, basswood, or other *Tilia* species in the State of Oregon

MIXING AND APPLICATION RATES: Determine the [[area] [number of square feet] [[(ft²)]] to be treated. Refer to Mixing Table below for amount of this product to be used. Mix the required amount of this product with the required amount of water and apply as a spray. Fill the sprayer tank with ½ of the water required for the treatment. Begin agitating the water and add the required amount of product to the tank. Continue mixing and add the remaining water. Maintain sufficient agitation during product application to ensure a uniform spray. Prepare a fresh spray mixture before each treatment.

MIXING TABLE

Pests to Control	Amount of this Product per 1,000 ft ²	Gallons of water per 1,000 ft ²
Darkling Beetles [Hide Beetles]	3 fl. oz.* (90 mL*)	1/2 - 2 gallons

*Equivalent to 45 grams of imidacloprid a.i./1,000 ft²

CONVERSION KEY: 128 fl. oz. = 1 gal., 16 fl. oz. = 1 pt., 8 pints = 1 gal., 1 fl. oz. = 29.5 mL

WHEN TO APPLY: Apply [[between flocks] [after each grow-out] [following de-caking] [to new litter following clean-out] [following sanitation procedures] [prior to placement of a new flock]].

HOW TO APPLY

Band Application: When darling beetles are concentrated in certain areas, such as under feed or water lines, or along the perimeter walls, it may not be [[necessary] or [desirable]] to treat the entire [[floor area] [litter surface]] of a [[poultry] [broiler] [turkey] [caged egg layer] [breeder]] house. In these situations, certain portions [of the house] [or “bands”] may be treated. For example, [[apply] [spray]] diluted product [[on] [to]]: a 3-foot wide band of litter [surface] under all of the [[feed] [water]] lines in the house; a 3-foot wide band of litter [surface] adjacent to the side and end walls; and the lower [[section] [portion]] of the walls, including 1 foot up onto wood surfaces above the [concrete] foundation. Be sure to measure the [actual] [[surface] [area] [square feet]] to be treated in order to determine the amount of this product required for the [[application] [treatment]].

Whole House Application: When darkling beetle infestation is severe, the entire house may need to be treated. Apply diluted product as a broadcast spray to the litter covering the entire floor area, especially to litter under feed and water lines, as well as to the lower sections of walls, including 1 foot up onto wood surfaces above the concrete foundation.

FOR BEST RESULTS: In houses with support beams, treat the litter surface around each support post, and 1 foot up each post. Also apply diluted spray to cracks and crevices around wall insulation, where beetles have been seen or can find harborage.

[INSECTICIDE ROTATION] [INTEGRATED PEST MANAGEMENT (IPM)] [RESISTANCE MANAGEMENT]

Darkling beetles, like all insects, have the ability to develop resistance to insecticides. When a single chemical class is used [[continuously] [flock after flock] [year after year] [time after time]], this [[enhances] [increases] [maximizes]] the [[likelihood] [probability] [certainty] [chance]] that resistance to that chemical class will develop. This product contains imidacloprid, which belongs to the class of chloronicotinyl insecticides. This product should be used in [[a] [an]] [[rotational] [insecticide rotation]] program with other [classes of] insecticides [[such as] [including, but not limited to]] [pyrethroids] [[such as] [Tempo® products] [Tempo SC Ultra]] [organophosphates] [spinosyns], to prevent [the development

of resistance and [[preserve] [prolong] [protect] [maintain]] the product's [[useful life] [usefulness] [effectiveness] [efficacy] [longevity] [value]] for darkling beetle control.

- Read and follow ALL label directions when [[using] [applying] [treating with]] this product or any other insecticide [product].
- Do not use this product or any other insecticide [product] at [[less] [lower]] than the label rate. This exposes the insects to a [[sub-lethal] [non-killing]] dose and [[hastens] [speeds up] [accelerates] [favors] [increases]] the development of resistance.
- Use [[other] [Integrated Pest Management] [IPM]] [[strategies] [tactics] [practices] [measures]] in addition to [[insecticide] [chemical]] [[applications] [treatments]] to [[manage] [control]] darkling beetle populations.

Contact your local Envincio LLC representative or your local Cooperative Extension Service for advice concerning use of this product and [[appropriate] [helpful] [suitable]] [[resistance management] [insecticide rotation]] [[strategies] [tactics] [practices] [measures]].

[NOTE: When pest exclusion at possible entry points is desired, supplement this product [litter] treatments with [targeted] [[applications] [treatments]] of a [[pyrethroid] [insecticide]] [such as [Tempo SC Ultra] [or] [Tempo 20 WP]] to the building perimeter, foundation, doors and windows, utility entry points, and other places where pests may enter the structure. Read and follow all label directions for use of [[these other] [companion]] products.]

FOR CONTROL OF ANTS (EXCEPT CARPENTER, HARVEST, FIRE OR PHARAOH ANTS) IN AND AROUND ANIMAL [[HOUSES] [FACILITIES] [BUILDINGS] [BARN]] AND OTHER STRUCTURES

Prepare a sufficient quantity of a 0.05 to 0.1% solution of this product by referring to the following table:

GALLONS WATER		0.05%	0.10%
1	PLUS	3.8 ml (0.75 tsp)	7.5 ml (1.5 tsp)
2		7.5 ml (1.5 tsp)	15.0 ml (1 tbs)
5		18.2 ml (3.7 tsp)	36.5 ml (2.5 tbs)
10		36.5 ml (2.5 tbs)	73.0 ml (2.5 fl. oz.)

Apply a 0.05 to 0.1% solution as a general surface, spot, crack and crevice or wall void application. Apply to surfaces on buildings, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or drilled holes) where these pests enter the structure or where they crawl or hide. Spray into cracks and crevices. Spray into voids where these ants or their nests are present. Apply the volume of spray, mist or foam sufficient to cover the area, but do not allow excessive dripping or run-off to occur from vertical or overhead surfaces.

When treating the perimeter, treat soil, turf or non-flowering ground cover, shrub or ornamental plant beds adjacent to the structure where ants are trailing or may find food, forage or harborage. Treat all plants prior to bloom or after all petals have fallen off. To control ants tunneling in soil apply a 0.05% to 0.1% solution as a drench at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Aerial Nests: If ant nests are located in tree hollows or non-structural wooden construction (e.g.; posts, fences, decks) treat the interior cavity and/or the nest site by injecting a 0.05%-0.1% solution as a spray mist.

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in a cool, dry place. Do not store diluted spray.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

(Nonrefillable \leq 5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

(Nonrefillable $>$ 5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Direction for Use of this Product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Envincio LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Envincio LLC and Seller harmless for any claims relating to such factors.

Envincio LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Envincio LLC., and Buyer and User assume the risk of any such use. To the extent consistent with applicable law, ENVINCIO LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall Envincio LLC or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. To the extent consistent with applicable law, **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENVINCIO LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING**

CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENVINCIO LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Envincio LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Envincio LLC.

Credo is a registered trademark of Bayer Healthcare, LLC.

Tempo is a registered trademark of Bayer.

EPA [approval date]

Additional / Alternate Marketing Claims

- One dose formula
 - No dust
 - Quick mix (liquid) formula
 - Specifically formulated for control of darkling beetles
 - Specifically formulated for the poultry industry
 - Quick mix and spray formula
 - Mix & Go (liquid) formula
 - One dose mix-and-go (liquid) formula
 - Formulated to meet the needs of poultry operations
 - Darkling beetle control (product) designed (formulated) specifically for poultry producers
 - Darkling beetle control (liquid) formula
 - Easy to apply, hard on darkling beetle (formula)
 - Quick Mix and Apply (Product)
 - Contains [(imidacloprid) (a chloronicotinyl insecticide)]
-
- Controls Darkling beetles that may [carry] [spread] [transmit] poultry disease-causing organisms
 - Controls darkling beetles that may damage [buildings] [ceilings] [walls] [insulation]
 - Controls darkling beetles that can feed on grain
 - Controls both [(darkling beetle) (lesser mealworm)] [and hide beetle] larvae and adults
 - Effective against both [(darkling beetle) (lesser mealworm)] [and hide beetle] larvae and adults
 - Stop (reduce) (alleviate) (take out) the risks darkling beetles [(pose) (bring)]
 - Stop the damage and risks that darkling beetles cause
 - Stop darkling beetles from [(taking) (eating)] your profitability
 - Reduce darkling beetle risk(s)
 - Reduce risks that darkling beetles [(pose) (bring)]
 - Reduce impact on neighboring communities
 - Reduce darkling beetles' negative impact on [poultry] [(production) (performance)]
-
- Effective control of [specified ants] [darkling beetles] [lesser mealworms] [hide beetles]
 - [(Targeted) (Banded)] [(application) (treatment)] delivers effective [(darkling beetle) (lesser mealworm)] [and hide beetle] control
 - One dose – effective, (easy) (simple) to use
 - [(Focused) (Targeted) (Strategic)] band [(treatment) (application)]
 - Allows labor saving band [(treatment) (application)]
 - Broadcast or banded treatment (application)
 - Less time consuming (band) [(application) (treatment)]
 - Easy and flexible treatment (options)
 - Time Saving Band Application
 - Mix and spray – fast and flexible treatment technology
 - This product can be applied as either a band or broadcast (spray) treatment
 - Controls even pyrethroid [(spinosad) (organophosphate)] resistant [(darkling beetle) (lesser mealworm)] [and hide beetle]
 - Use less insecticide (per house/building/barn) with a banded application
 - Less insecticide – [(targeted) (banded)] [(application) (treatment)]
 - Easy and targeted control of [(darkling beetle) (hide beetle) (lesser mealworm)]
 - [(Protection) (Control)] exactly where you need it
 - Flexible application for any poultry operation
 - Save time, labor and money with [(targeted) (focused)] band application
 - Banded application saves time, labor and money; Provides effective control

- Apply [(treatment) (control)] right where you need it
- Easy (One) Dose Technology
- One dose, mix, and spray – Quick and Easy
- Target [(darkling beetles) (lesser mealworms)] [and hide beetles]
- The active ingredient in this product (imidacloprid) has been proven to provide effective control of [ants (except carpenter, harvest, fire or pharaoh ants)] [(darkling beetles) (lesser mealworms)] [and hide beetles]
- Controls darkling beetle adults and larvae
- The solution to [(darkling beetle) (lesser mealworm)] [and hide beetle] control
- [(Control) (Reduce)] darkling beetles that can [(spread) (carry)] disease causing organisms
- Rotate with pyrethroid insecticides to manage resistance
- Manage resistance with a rotation of this product and pyrethroids