

US EPA ARCHIVE DOCUMENT

REVISED EFFICACY STUDY REVIEW

Revision of review dated 10/21/02
by Kevin J. Sweeney, Entomologist - IB

Kevin Sweeney
10/24/02
10/24/02

To: Melody Banks

Date: 10/24/02

EPA Reg. No. or File Symbol: 3095-TR

Product Name: PIC Ant Killer Gel

Registrant: PIC Corporation

PM: Joseph Tavano

Action: 166

Submission No. S610737 DP #: D281940

Chemical: sodium tetraborate pentahydrate 5% Type: gel insecticide bait

Pests: ants (other than fire ants) to include sweet and grease eating ants, pavement ants, odorous (house) ants and Little Black ants.

OPPTS Guideline: 810.35

Studies: non-GLP laboratory and a field studies were submitted to support the label claims and to satisfy product performance requirements. Registrant claims this is a "me-too" of 3095-47.

MRID 45620702 Efficacy of PIC Liquid Ant Bait Killer on Field Populations of Ghost Ants (*Tapinoma melanocephalum*) and Crazy Ants (*Patratrechina longicornis*) by Donald Bieman, San Pedrito Institute, Inc, Puerto Rico. August 2001. (Field Study for 3095-47)

MRID 45630804 Efficacy of PIC Ant Killer Gel on Field Populations of Ghost Ants (*Tapinoma melanocephalum*) and Crazy Ants (*Patratrechina longicornis*) by Donald Bieman, San Pedrito Institute, Inc. Puerto Rico, August 2001.

Entomologist's Comments and Recommendations:

1. The submitted studies fulfill the product performance requirement for the proposed label claims.

PC 011110

2. Add (excluding fire ants and carpenter ants) on the front panel in the bullet naming the pest ant species.
3. Change "Odorous ants" to read "Odorous House ants".
4. Remove the claim "long term control".
5. In directions for use section on page 2, change the italicized sentence to read: "*In approximately 7-10 days the bait will start killing ants. Baiting may be required for up to 2 months to kill all ants in a colony.*" This is the type of claim supported by your data. You might want to clarify such claims by discussing the fact that the active ingredient is slow-acting.
6. Queen/colony killing claims: Add: it may take up to two months to kill all queens in the baited colonies.
7. Gel baits are usually delivered from a "bait gun" or squeeze bottle, but use of these devices is not mentioned in the submitted study. However, the methods section of the study (which reads almost exactly as the study for the liquid bait) states that gel was placed in "The Ant Café". This device is usually used for liquid bait, not gel bait applications. The label should state a specific device if required. The study's methods section should be amended to describe the gel bait application required by the proposed label. Was water added to the gel as described by the label? Did the ants feed on the gel only without additional water as described on the label for crack and crevice treatments?
8. In the future, the results of the statistical analyses should be more clearly presented and should include confidence intervals. The tables are helpful but can also be confusing without more explanation. The graphs were well done.

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