

228-510

10.4.2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OCT 4 2007

George Meindl
Registration Manager
Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

SUBJECT: Application for Pesticide Notification – Request for Additional Language and
Application Chart
Mallet® 0.2 Granular Insecticide
EPA Reg. No. 228-510
Application Dated September 13, 2007

Dear Mr. Meindl:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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<p>United States Environmental Protection Agency Washington, DC 20460</p>	<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 228-510	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Mallet 0.2% Granular Insecticide	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas, Inc. 150 Harvester Drive Suite 200 Burr Ridge, IL 60527 <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 OCT 04 2007
<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.)

Label notification per PR notice 98-10. See cover letter for detailed explanation. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or 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 statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 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.

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 <input type="checkbox"/> Other (Specify) _____
* 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		4. Size(s) Retail Container		5. Location of Label Directions	
<input type="checkbox"/> Label <input type="checkbox"/> Container				<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 George Meindl (george.meindl@us.nufarm.com)	Title Registration Manager	Telephone No. (Include Area Code) 630.455.2017
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 <input type="checkbox"/> (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name George Meindl	5. Date 9/13/2007	



Nufarm Americas, Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455-2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

September 13, 2007

Via Overnight Courier

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

NOTIFICATION

OCT 04 2007

Subject: Mallet 0.2% Granular Insecticide
EPA Reg. No. 228-510
Label notification per PR98-10

Dear Ms. Hobgood:

Nufarm Americas, Inc would like to include additional label language to the subject product's registration. We believe this language is consistent with PRN98-10 section II (Labeling notifications) and part H (Use of Symbols and Graphics) and part M (Changes in mixing directions which do not affect the dilution ratio or the minimum or maximum use dilutions) and part N (Other revisions, which are related to FIFRA).

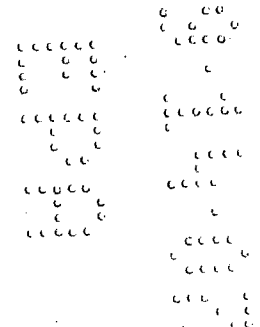
To process this request please find enclosed the following:

- Application for Pesticide Registration (EPA form 8570-1)
- Revised labeling with areas of change clearly identified (1 copy)
- Revised labeling – clean (1 copy)

If you should have any questions regarding this matter, please feel free to contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Registration Manager
Nufarm Americas, Inc.





George.Meindl@us.nufarm.com
m
10/04/2007 11:30 AM

To Terri Stowe/DC/USEPA/US@EPA
cc
bcc

Subject Re: 09/13/07 Notification Application for EPA Reg. # 228-510

Hi Terri - Thank you for bring these issues to my attention. Attached is the corrected labelling, with the changes made per your email.

(See attached file: 228-510 Mallet 0.2 Granular Insecticide (228-510) EPA 100407 emailed to Terri Stowe on 10.4.2007.pdf)

I know I will get official notification from you on the acceptance of this label notification. However if its OK with you, I will consider this labeling acceptable per this email.

Thanks again!

George Meindl
Registration Manager
Nufarm Americas Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
phone 630.455.2000 (main)
phone 630.455.2017 (direct)
fax 630.455.2030 (regulatory dept.)
email george.meindl@us.nufarm.com

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Stowe.Terri@epama
il.epa.gov

10/03/2007 10:17
PM

To
george.meindl@us.nufarm.com
cc

Subject
09/13/07 Notification Application
for EPA Reg. # 228-510

4/10

Dear Mr. Meindl:

I am reviewing your 09/13/07 Notification application for EPA Reg. # 228-510. The requested changes are acceptable, but you may want to make the following changes to your label before I accept it. If you agree these changes should be made, then please send me an electronic copy of the revised label via e-mail or fax it to me at (703) 305-6920:

On pg. 2 in the "Pest" chart, place a comma between "Black turfgrass ataenius" and "billbugs".

On pg. 4 in the red section, correct the spelling of "Asiatic Garden Beetle" to "Asian Garden Beetle" throughout this section.

Best regards,

Terri :o)

Terri Stowe
Senior Regulatory Specialist
(703) 305-6117 Voice, (703) 305-6920 Fax
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division (Mail Code 7505P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Courier Address: 2777 Crystal Drive, 1 Potomac Yard, Mail Room S-1508,
Arlington, VA 22202

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228-510 Mallet 0.2 Granular Insecticide (228-510) EPA 100407 emailed to Terri Stowe on 10.4.2007.pdf

4/10

NOTIFICATION

OCT 04 2007

Mallet® 0.2

GRANULAR INSECTICIDE

FOR OUTDOOR RESIDENTIAL USE ON LAWNS AND LANDSCAPED AREAS.

ACTIVE INGREDIENT:	
Imidacloprid	0.2%
OTHER INGREDIENTS:	99.8%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION
 SEE SIDE PANELS FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
 For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 228-510
 EPA EST. NO.

MANUFACTURED BY
 NUFARM AMERICAS INC.
 BURR RIDGE, IL 60527



NET CONTENTS LBS.

000228-00510.20071004.Notification
 NUP-06022

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if absorbed through skin. Causes minimal eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

FIRST AID	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
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 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

ENVIRONMENTAL HAZARDS

This product is highly toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

For use on lawns, landscaped areas and plantings such as around trees, shrubs, flower and ornamental beds.

Do not apply near fish pools, ponds, streams or lakes.

GENERAL INFORMATION

This product can be used for control of soil pests such as mole crickets and white grubs, including the larvae of Japanese beetle, Oriental beetle, Chafers, Asian garden beetle, May beetle, June beetle and black turfgrass ataenius. This product can also be used to control billbugs, cutworms, chinchbugs and European crane fly larvae.

PEST	USE RATE PER 1,000 SQ. FT.
White grubs, including the larvae of Japanese beetle, Oriental beetle, Chafers, Asian garden beetle, May beetle, June beetle and Black turfgrass ataenius, billbugs, Cutworms, Chinchbugs and European crane fly larvae.	2.87 pounds
Mole crickets	3.80 pounds

Treat when insects first appear. Apply this product evenly over the turfgrass area at the use rate indicated in the above table, using a properly calibrated drop or rotary spreader. A more uniform application may be achieved by spreading half of the required amount of product over the area and then applying the remaining half in swaths at a right angle to the first. For optimum control, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch and down into the soil. Avoid lawn until after irrigation or rainfall has occurred so that uniformity of the application will not be affected.

FLOWER BEDS, GROUND COVERS, TREES AND SHRUBS

Application Instructions

Apply this product at the rate of 2 tablespoons per 10 square feet of planting bed (1-1/4 cups per 100 square feet of planting bed). Evenly spread granules to the soil over flower beds, ground cover plantings, shrub beds and under trees. The use of a hand-held spreader is recommended. Rake granules into the soil around plants. Water thoroughly after application.

This product works best when applied before mole crickets and grubs hatch. If necessary, consult your local State extension agent for the ideal times to apply this product in your area. Do not apply this product to potential treated areas that are waterlogged or saturated with water. This product may not work effectively in these times of conditions.

SPREADER SETTINGS

Broadcast Spreaders: For best results, apply in a circular path starting on the outside and working toward the center. A little overlap of product will ensure complete coverage.

Drop Spreaders: First, apply 2 border strips along the edge of each end of the lawn. Then apply product along the length of the lawn, overlapping slightly and shutting off the spreader before turning as you reach the edge of the border strips.

Applications Instructions

See Spreader Settings chart below. Adjust spreader to the appropriate setting. Make sure that the spreader works properly and spreads granules uniformly. Apply to the border and then fill in the center to ensure the entire area is covered completely. To make sure that the product is evenly distributed, walk at a steady pace making parallel passes. Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Water thoroughly after application.

Important: It is important to follow the directions as indicated on this quality lawn care product as over-application may cause injury to the lawn. Measure the size of the area to be treated and do not over or under apply. Spreader settings are approximate. Differences may occur due to condition of spreader, speed at which applied, and roughness of area treated. Calibrate spreader prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing uniformly. Close spreader when filling, stopping or turning. Do not hand spread.

Note: Following will be a list of application spreaders and approximate settings. This list will vary dependent on market of spreaders. (This note will not appear on final printed label.)

Spreader	2.87 lbs./1,000 sq.ft.	3.80 lbs./1,000 sq.ft.
aa	XX	XX
bb	XX	XX
cc	XX	XX

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original container only. Store in a cool, dry place and avoid excess heat.

CONTAINER DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

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If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(091407A)

Mallet is a Registered Trademark of Nufarm Americas, Inc.

Optional performance guarantees:

Optional language:

One application kills white grubs, mole crickets and European crane flies all year round

Season long grub control

Apply anytime from spring through late summer

One application stops/kills grubs all season long

Apply before insects hatch to prevent turf damage

14.35 lb. treats up to 5,000 square feet (XX lbs. treats up to XXXX square feet)

This product kills grubs all season long with a single application.

Keeping you lawn free of damaging grubs has never been easier.

Visit our website at {address}

Contains Mallet

Contains Mallet Grub killing Insecticide

Treats up to 5,000 sq. ft.

Treats up to 3,775 square feet for Mole Crickets

One application kills grubs [including] [larvae of] [Asian Garden Beetle], [Black Turfgrass Ataenius], [Chafers], [Japanese Beetle], [May or June Beetle], [and] [Oriental Beetle] all season long.]

Apply anytime from May through mid-August

One application kills [White] [Grubs] [and] [European Crane Fly Larvae] all season long

Kills [White] [Grubs] [and] [European Crane Fly Larvae] before they damage lawns.

Easy-to-Use Granules

For use on lawns, ground covers, flower beds, and around trees & shrubs.

Kills grubs, European crane fly larvae and mole crickets.

This product is for use on lawns, flower beds, ground covers, trees and shrubs to control White Grubs (including larvae of Asian Garden Beetle, Black Turfgrass Ataenius, Chafers, Japanese Beetle, May or June Beetle, and Oriental Beetle), Mole Crickets and European Crane Fly Larvae.

For best results, apply this product before grubs, mole crickets or European crane fly larvae hatch and can cause damage. Contact your County Extension Agent for the best dates to apply in your area.

PESTS CONTROLLED	WHEN TO APPLY	INDICATION OF DAMAGE	USE RATE PER 1,000 SQ. FT.
Grubs	Apply once anytime from May through mid-August	White grubs cause widespread damage to lawns by feeding on grass roots, causing it to turn yellow, then brown and die.	2.87 pounds
European crane fly larvae	Apply once, when these insects are present in large numbers.	European crane fly larvae cause damage by feeding on grass roots and disturbing the soil surface.	2.87 pounds
Mole Crickets	Apply once anytime from mid-May through mid-June. Florida residents - Apply once anytime between early April through early May.	Mole crickets cause widespread damage by tunneling through the soil, while some species also feed on roots. Tunneling through the soil uproots the grass causing it to dry out, become thin and weedy, turn yellow and eventually die.	3.80 pounds
<p>For best results:</p> <ul style="list-style-type: none"> • Apply early before grubs, mole crickets and European crane fly larvae hatch. • Irrigate thoroughly within 24 hours of application to form a protective zone in the soil. • Avoid mowing until granules are watered into the soil. • Do not apply to water saturated areas. This may decrease product effectiveness. • This product can be applied over soil or mulch. Remove black plastic or other weed barrier material prior to application. <p>Keep children and pets off treated area until it has dried.</p>			

10/10

Spreader Settings*

Rate for Grubs and European Crane Fly Larvae: 2.87 pounds per 1,000 square feet.

Rate for Mole Crickets: 3.80 pounds per 1,000 square feet.

Broadcast Spreaders Model	Rate Setting 2.87 lbs/ 1,000 sq. ft.	Rate Setting 3.80 lbs/ 1,000 sq. ft.	Distance Between Passes (ft.)
Cyclone Rotary			
Earthway Rotary			
EV-N Speed			
K-Gro Rotary			
Ortho Rotary			
Precision Rotary (#SB50)	SPREADER SETTINGS AVAILABLE AT PRINTING		
Red Devil Rotary			
Republic EZ Rotary (#540)			
Scotts Easygreen (#EG-3)			
Scotts Speedygreen 1000			
Scotts Speedygreen 2000			
Scotts Speedygreen 3000			
Sears Rotary			
True Temper Rotary			
Vigoro Rotary			
Drop Spreaders Model	Rate Setting 2.87 lbs/ 1,000 sq. ft.	Rate Setting 3.80 lbs/ 1,000 sq. ft.	Distance Between Passes (ft.)
Amzs Drop			
K-Gro Drop			
Ortho Drop			
Precision Drop (#FH22G)			
Red Devil Drop	SPREADER SETTINGS AVAILABLE AT PRINTING		
Republic EZ Drop (#530)			
Scotts Accugreen 1000			
Scotts Accugreen 2000			
Scotts Accugreen 3000			
Scotts Drop (#PF1,PF2, PF3, PF4)			
Sears Drop			
Sta-Green Drop			
Vigoro Drop			
<p>* Spreader settings are approximate. The condition of your spreader, the speed that you walk, and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer's instructions. TIP: 1,000 sq. ft. = 20 ft. x 50 ft.</p>			