

228-510

11/17/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

NOV 17 2008

SUBJECT: Applications for Pesticide Notification – Requests for Additional Labeling Language
Mallet® 0.2% Granular Insecticide EPA Reg. No. 228-510
Application Dated October 7, 2008
Mallet® 5G Insecticide EPA Reg. No. 228-566
Application Dated September 25, 2008

Dear Mr. Meindl:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the label changes requested fall within the scope of PRN 98-10. The labels have been date-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



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

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 _____	

NOTIFICATION
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Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<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
* 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 <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		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 George Meindl (george.meindl@us.nufarm.com)	Title Regulatory Affairs 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 (Stamped)
2. Signature 	3. Title Regulatory Affairs Manager	
4. Typed Name George Meindl	5. Date 10/7/2008	



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

October 7, 2008

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

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 M (Mixing with a fertilizer) and part N (Other revisions, which are related to FIFRA).

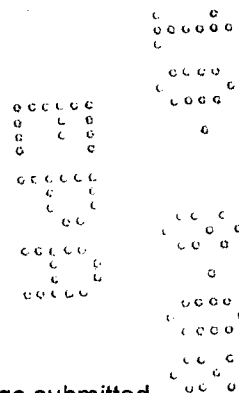
To process this request please find enclosed the following:

- 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
Regulatory Affairs Manager
Nufarm Americas, Inc.



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highlighted
see page 4+6

Mallet[®] 0.2

GRANULAR INSECTICIDE

FOR OUTDOOR RESIDENTIAL USE ON LAWNS AND LANDSCAPED AREAS.

Not for sale, use, or distribution in or into Nassau, Suffolk, Kings or Queens Counties, New York.

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

NOTIFICATION
NOV 17 2008

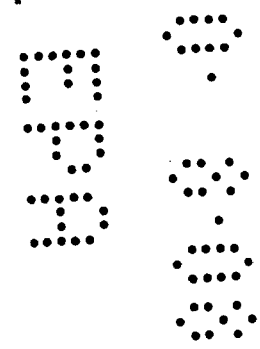
EPA REG. NO. 228-510
EPA EST. NO.

MANUFACTURED FOR
NUFARM AMERICAS INC.
150 HARVESTER DRIVE
BURR RIDGE, IL 60527



NET CONTENTS LBS.

000228-00510.20081007.EPA.A
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 ateniensis. 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 ateniensis 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.

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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

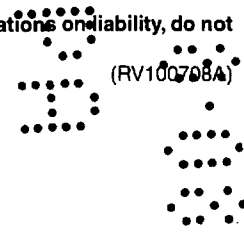
The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, 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.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

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.

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] [Asiatic 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 [Also] controls [kills] [cutworms] & [chinchbugs].

This product is for use on lawns, flower beds, ground covers, trees and shrubs to control White Grubs (including larvae of Asiatic 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.

[Helps your lawn stay strong during the stressful summer months] (may be included on label if marketed on fertilizer carrier)

[14-0-3] (may be included on label if marketed on fertilizer carrier)

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

For best results:

- 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.

Keep children and pets off treated area until it has dried.

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>			



[Optional Spreader Settings chart and text may be used with fertilizer carriers.]

Spreader Settings for Lawn Applications

MAKE & MODEL	0.5 lb /1,000 sq ft	MAKE & MODEL	0.5 lb / 1,000 sq ft
Scotts Edge	4-1/4	Scotts AccuGreen 1000	5-1/2
Scotts SpeedyGreen 1000	4-1/4	Scotts AccuGreen 2000	5-1/2
Scotts SpeedyGreen 2000	4-1/4	Scotts AccuGreen 3000	5-1/2
Scotts SpeedyGreen 3000	4-1/4	Earthway 2000	8
Vigoro 4300	3	Earthway 2050	6

[Typically, a lawn utilizes 1 to 4 lbs of nitrogen per 1,000 sq ft per growing season. When applied as directed, this product provides 0.42 lb of nitrogen per 1,000 sq ft. Contact your local Extension Service for information specific to your geographic region.] (optional text when using fertilizer carriers)

[GUARANTEED ANALYSIS 14-0-3

Total Nitrogen (N)14%

14.0% Urea Nitrogen

Derived from: Urea, Muriate of Potash

F1074] (optional text when using fertilizer carriers)

[Typically, a lawn utilizes 1 to 4 lbs of nitrogen per 1,000 sq ft per growing season. When applied as directed, this product provides 0.42 lb of nitrogen per 1,000 sq ft. Contact your local Extension Service for information specific to your geographic region.]

[When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials.]

[Information regarding the contents and level of metals in this product is available on the internet at <http://www.regulatory-info-sb.com>]

[Grub Life Cycle and Graphics] (optional marketing language)

Grub Life Cycle [graphics]

