

279-3167

2-12-2003

1/6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

FEB 12 2003

Mr. Michael C. Zucker
FMC Corporation, Agricultural Products Group
1735 Market Street
Philadelphia, PA 19103

Subject: Reinstatement of Re-Entry Statements in Non-Ag Use Box
Talstar® GC Granular
EPA Reg. No. 279-3167
Your Submission Dated February 4, 2003

Dear Mr. Zucker:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. You must update the First Aid statements in accordance with the guidance in PR Notice 2001-1.
2. You must delete the following sentences from the Agricultural Use Requirements box: "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." [These statements already appear in the correct location near the beginning of the Directions for Use.]
3. The Personal Protective Equipment (PPE) and early-entry PPE are not consistent. In accordance with PR Notice 93-7, if body wear required for applicators and other handlers consists of "long sleeved shirt and long pants", then the early-entry body wear should be "coveralls". The glove requirement for applicators and other handlers should be the same as the early-entry glove requirement. Please revise these sections to comply with PR Notice 93-7.

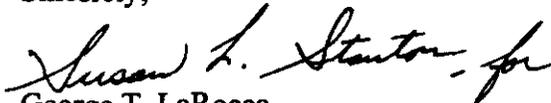
We note that this granular turf product recommends use rates of up to 0.4 lbs. active ingredient (a.i.) per acre. As part of FMC's risk mitigation proposal for bifenthrin, submitted September 16, 2002, FMC committed to reduce lawn application rates for granular products to a maximum of 0.2 lbs. a.i. per acre. We strongly advise you to reduce the maximum use rate for

2/6

this product and other granular lawn products as soon as possible. The Agency's decisions regarding pending new uses of bifenthrin (including the proposed use of bifenthrin in food handling establishments) will depend, in part, on FMC honoring its commitment to reduce these rates.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure

3/16

RESTRICTED USE PESTICIDE
Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators, or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

Net Contents

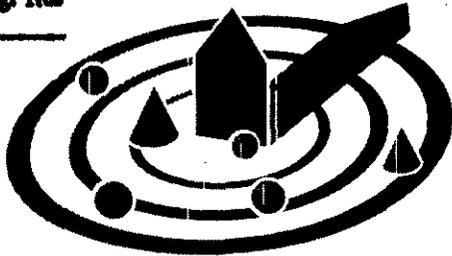
ACCEPTED
with COMMENTS
In EPA Letter Dated:

FEB 12 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 279-3167

Talstar®

GC Granular
INSECTICIDE



For use to control Ants (including Imported Fire Ants), Mole Crickets and other Insect pests on lawns in landscaped areas and perimeters around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, golf courses, sod farms and athletic fields.

[Insert photo of golf course]

EPA Reg. No. 279-3167

EPA Est. 279-

Active Ingredient:	By Wt.
Bifenthrin*	0.2%
Inert Ingredients	99.8%
	<hr/> 100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum.
U.S. Patent No. 4,238,505

KEEP OUT OF REACH OF CHILDREN
CAUTION

See other panels for additional precautionary information.

DO NOT USE THIS PRODUCT ON GOLF COURSES AND SOD FARMS IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK.



FMC Corporation
Agricultural Products Group
Philadelphia PA 19103

2/03 Non-Ag box revision H11

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation occurs and persists.

Note to Physician:

This product is a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

For Emergency Assistance Call: (800) 331-3148.

For Information Regarding the Use of this Product Call 1-800-321-1FMC (1362).

PRECAUTIONARY STATEMENTS

Hazards to Humans (and Domestic Animals)

Caution

Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing.

The following Personal Protective Equipment requirements apply to sod farm use only

Personal Protective Equipment:

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Waterproof gloves
- Shoes and socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is extremely toxic to fish 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. Do not apply when weather conditions favor drift from treated areas. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

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.

Do not apply by air.

Do not broadcast apply more than 0.4 lbs. A.I. (200 lbs. Talstar GC Granular) per Acre per year.

4/6

Do not apply within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries, and commercial fish farm ponds.

Not for use on nurseries, commercial greenhouses or grass grown for seed.

GRASS AND PERIMETER APPLICATIONS

(Including Golf Courses and Sod Farms)

Grass Application: Broadcast Talstar® GC Granular Insecticide with suitable application equipment to ensure uniform coverage over the treatment area.

APPLICATION RATES

The application rates listed in the following table will provide excellent control of the respective pests under typical conditions. However, at the discretion of the applicator, Talstar GC may be applied at up to 0.4 lb A/A to control each of the pests listed in this Table.

Pest	Active ingredient lbs. per acre	Application Rate Talstar GC	
		per acre	per 1000 sq. ft.
Armyworms ¹ Cutworms ¹ Sod Webworm ¹	0.1 lbs. A/A	50 lbs. per acre	1.15 lbs. per 1000 sq. ft.
Annual Bluegrass Weevil (<i>Hyperodes</i>) (Adult) ² Billbugs (Adult) ³ Black Turfgrass Ataenius (Adult) ⁴ Leafhoppers Mealybugs	0.1 - 0.2 lbs. A/A	50 - 100 lbs. per acre	1.15 - 2.3 lbs. per 1000 sq. ft.
Ants Centipedes Chinch Bugs ⁵ Fleas (Adults) Fleas (Larvae) ⁶ Imported Fire Ants (Adult) ⁷ Imported Fire Ants (Mounds) ⁷ Millipedes Mole Cricket (Adult) ⁸ Mole Cricket (Nymph) ⁹ Ticks ¹⁰	0.2 - 0.4 lbs. A/A	100 - 200 lbs. per acre	2.3 - 4.6 lbs. per 1000 sq. ft.
Pillbugs Sowbugs	0.4 lbs. A/A	200 lbs. per acre	4.6 lbs. per 1000 sq. ft.

In New York State, this product may NOT be applied to any grass or turf area within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).

In New York State, do make a single repeat application of Talstar GC Granular if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

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.

Do not enter or allow worker entry to treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is:

Coveralls over long-sleeved shirt and long pants.

Chemical-resistant gloves, such as barrier laminate or butyl rubber.

Shoes plus socks.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standards for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries and greenhouses.

If watering-in of the granules is necessary, do not allow people or pets on treated areas until the grass or soil is dry.

Do not touch treated surface until dry.

STORAGE AND DISPOSAL

Prohibitions

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

Pesticide Storage

Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use close tightly.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call FMC: (800) 331-3148.

To confine spill: Cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

Pesticide Disposal

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

Container Disposal

Paper and plastic bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

5/6

Comments

¹**Armyworms, Cutworms, and Sod Webworms:** To ensure optimum control, irrigate the treated area with up to 0.1 inches of water immediately after application to activate (release from the granule) the insecticide.

²**Annual Bluegrass Weevil (*Hyperodes*) adults:** Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when *Forsythia* is in full bloom and concludes when flowering dogwood is in full bloom. Consult your State Cooperative Extension Service for more specific information regarding application timing.

³**Billbugs:** Applications should be made when adult billbugs are first observed during April and May. Degree day models have been developed to optimize application timing. Consult your State Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of over-wintered chinch bugs.

⁴**Black Turfgrass Ataenius:** Applications should be made during May and July to control the first and second generation of black turfgrass ataenius adults, respectively. The May application should be timed to coincide with the full bloom stage of *Vanhoutte spiraea* (*Spiraea vanhouttei*) and horse chestnut (*Aesculus hippocastanum*). The July application should be timed to coincide with the blooming of Rose of Sharon (*Hibiscus syriacus*).

⁵**Chinch Bugs:** Chinch bugs infest the base of grass plants and are often found in the thatch layer. Irrigate the treated area with up to 0.25 inches of water immediately after application to activate (release from the granule) the insecticide. Chinch bugs can be one of the most difficult pests to control in grasses and the higher applications rates may be required to control populations that contain both nymphs and adults during the summer.

⁶**Flea larvae:** Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Irrigate the treated area with up to 0.5 inches of water immediately after application to activate (release from the granule) the insecticide.

⁷**Imported Fire ants:** Control will be optimized by combining broadcast applications that will control foraging workers and newly mated fly-in queens with mound drenches that will eliminate existing colonies. If the soil is not moist, then it is important to irrigate before application. Broadcast treatments should apply up to 0.4 lb A/A. Mounds should be treated by diluting 1 teaspoon of Talstar GC Flowable (EPA Reg. No. 279-3156) formulation per gallon of water and applying 1 to 2 gallons of finished spray per mound. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65 - 80° F) or in early morning or late evening hours. Note: a spray rig that is calibrated to apply 0.1 lb A/A (20 ozs.) of Talstar Flowable in 2.5 gallons per 1,000 square feet contains the approximate dilution (1 teaspoon per gallon) that is required for fire ant mound drenches in the spray tank. Application of 0.25 lbs. a.i./acre of Talstar GC will provide six months residual activity for control of foraging Imported Fire Ants and newly mated Fly-In Queens.

⁸**Mole Cricket adults:** Achieving acceptable control of adult mole crickets is difficult because preferred grass areas are subject to continuous invasion during the early spring by this extremely active stage. Applications should be made as late in the day as possible and should be watered in with up to 0.5 inches of water immediately after treatment. If the soil is not moist, then it is important to irrigate before application to bring the mole crickets closer to the soil surface where contact with the insecticide will be maximized. Grass areas that receive pressure from adult mole crickets should be treated at peak egg hatch to ensure optimum control of subsequent nymph populations (see below).

⁹**Mole Cricket nymphs:** Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately prior to peak egg hatch. Optimal control is achieved at this time because young nymphs are more susceptible to insecticides and they are located near the soil surface where the insecticide is most concentrated. Control of larger, more damaging, nymphs later in the year may require both higher application rates and more frequent applications to maintain acceptable control. Applications should be made as late in the day as possible and should be watered in with up to 0.5 inches of water immediately after treatment. If the soil is not moist, then it is important to irrigate before application to bring the mole crickets closer to the soil surface where contact with the insecticide will be maximized.

¹⁰**Ticks:** Do not make spot applications. Treat the entire area where exposure to ticks may occur. Use higher application rates when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreat as necessary to maintain adequate control. Do not allow public use of treated areas during application.

Deer ticks (*Ixodes sp.*) have a complicated life cycle that ranges over a two year period and involves four life stages. Applications should be made in mid to late-spring to control larvae and nymphs that reside in the soil and leaf litter.

American dog ticks may be a considerable nuisance in suburban settings, particularly where homes are built on land that was previously field or forest. These ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control American dog tick larvae, nymphs and adults.

Perimeter Application: Apply to ground area 5 to 10 feet wide around and adjacent to the structure.

Applic. Rate: Pounds Per 1,000 sq. ft.	Band Width	Pounds of Talstar GC Granular for Perimeter Applications Linear Distance (Feet) Around Structure								
		100	150	200	250	300	400	500	1,000	
2.3	5 feet	1.3	1.9	2.5	3.0	3.6	4.8	5.9	11.7	
2.3	10 feet	3.0	4.2	5.3	6.5	7.6	9.9	12.2	23.7	
3.0	5 feet	1.7	2.5	3.3	3.9	4.7	6.3	7.7	15.2	
3.0	10 feet	3.9	5.4	6.9	8.5	9.9	12.9	15.9	30.9	
3.5	5 feet	2.0	2.9	3.8	4.5	5.4	7.2	8.9	17.5	
3.5	10 feet	4.5	6.3	8.0	9.8	11.4	14.9	18.3	35.5	
4.6	5 feet	2.6	3.8	5.0	6.0	7.2	9.6	11.8	23.4	
4.6	10 feet	6.0	8.4	10.6	13.0	15.2	19.8	24.4	47.4	

Note: The amounts of Talstar GC Granular listed in the above table are based on the total area being treated. This area is determined by multiplying the linear distance by the band width and then adding to that value the area of a circle whose radius is equal to the band width (to account for the area treated at the four corners of a rectangular structure).

INDUSTRIAL NON-AGRICULTURAL APPLICATIONS
(Including Industrial Sites, Parks, Ball Fields and Cemeteries)

Broadcast Spot Applications: For the control of actively foraging ants (including Imported Fire Ants) broadcast uniformly 2.3 to 4.6 lbs. Talstar GC per 1000 sq. ft. (0.2 to 0.4 lbs. A/Acre). See comments section under Grass Applications for additional rate recommendations.

Pad Mounted Electrical Sites: To reduce or prevent ant mound building activity on electrical pads, uniformly distribute 1.0 to 1.5 Tablespoons (0.06 to 0.09 lbs.) of Talstar GC per 4 sq. ft. of mounting pad. Where existing transformers are completely or partially filled with soil excavated by resident Ants, remove any excess fill and level the remaining soil prior to application. **Food utensils such as tablespoons must not be used for food purposes after use in measuring pesticides.**

Note: Electrical transformers appear to be more attractive to ants during the cooler months. For best results treat in the Fall or early Spring.

Talstar® GC Granular Insecticide
Recommended Spreader Settings for Broadcast Applications

Equipment	Ground Speed (MPH)	Spreader Setting			
		100 Pounds per Acre Once Over	100 Pounds per Acre Twice Over	200 Pounds per Acre Once Over	200 Pounds per Acre Twice Over
Hand-Pushed					
LESCO Rotary	3	B + 1/4	A + 1/2	C + 1/2	B + 1/4
Scotts R-8A-1 Rotary	3	G	E	Not Rec.	G
Gandy Models (42, 36, 30, 24")	3	12	10.5	16	12
Spyker (all Models)	3	2.6	2	3.1	2.6
Equipment Drawn (PTO=540 RPM)					
Gandy Models (42, 36, 30, 24")	4.5	14	11.5	19	14
Gandy 6500 Series	4.5	15	11	20	15
Gandy 10T Series	5.0	16.5	12	24	16.5
Herd GT-77	4.0	--	--	8-H	--
Herd GT-77	8.0	8-H	--	--	8-H
Lely 2.3202.000.1	4.5	2	1	3.5	2
Lely Model L-400	4.5	Not Rec.	Not Rec.	2	Not Rec.
Vicon PS402	4.5	10	7	16	10
Vicon PS1002T	4.5	13	9	21	13

6/6

Note: These recommended settings should be used as starting points when calibrating a spreader to achieve the desired application rate of Talstar GC Granular. After calibration, the technician should regularly observe the amount of Talstar GC Granular that is applied to a known area and make further setting adjustments, as necessary, to maintain the appropriate application rate. Spreaders should be calibrated periodically to ensure that equipment wear or other factors have not altered the flow rate of Talstar GC Granular. Calibration instructions are included in the Owner's Manual that was provided by the equipment manufacturer at the time of purchase.

RECOMMENDED SPREADER SETTINGS (Optional Text)

Note: Following will be a list of application spreaders and appropriate settings. This list will vary depending on the alternate carrier used. (This note will not appear on final printed label).

Note: These spreader settings were established using standard equipment available from the spreader manufacturer at swath widths and speeds typically used within the industry. It is recommended that all spreader equipment be calibrated at the time of application to achieve the desired application rate.

Resistance: Some insects are known to develop resistance to products used repeatedly for control. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. Consult your local or state pest management authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and suspect that resistance is a reasonable cause, immediately consult your local company representative or pest management advisor for the best alternative method of control for your area.

Dealers Should Sell in Original Packages Only.

Terms of Sale or Use: On purchase of this product buyer and user agree to the following conditions:

Warranty: FMC makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Directions and Recommendations: Follow directions carefully. Timing, method of application and weather conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller and are assumed by the buyer at his own risk.

Use of Product: FMC's recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Damages: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

Talstar and **FMC**—FMC Trademarks

(1683-6/29/99)

Revisions:

- 1. Addition of two statements to non-Ag box per 1/28/03 Agency letter.