



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. George Meindl  
FMC Corporation  
APG Specialty Products  
1735 Market Street  
Philadelphia, PA 19103

NOV 29 2000

Dear Mr. Meindl:

Subject: Request to Amend Label - Reformatting Label  
Talstar 0.086% Lawn Granular Insecticide with Fertilizer  
EPA Reg. No. 279-3203  
Your Submission Dated September 25, 2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided the following changes are made to the label:

1. The efficacy data submitted under MRID 44891901-08 related to a liquid formulation. EPA Reg. No. 279-3203 is a granular product intended to be used at a 0.1 lb ai/acre rate. Data used to support a liquid formulation can not be cited to support a granular formulation.
2. You are not claiming 6 month residual control, so the data provided by MRID 44021901 is not applicable.
3. Data provided by MRID 44137401-02, although a granular formulation, only supports a 0.2 lb ai/acre rate.
4. Due to the above, ticks, fleas, scorpions and spiders are not supported by the data you cited. Either remove these pests from the label, submit efficacy data based on a granular formulation based on the appropriate label use rate, or cite other pertinent data to support these pests.
5. Delete the front panel claims, "Kills fleas and ticks before they get on your pets. Kills fleas and brown dog ticks before they get on your pets". Claims for indirect or secondary benefits without data are unacceptable.
6. On page 5, delete, "Unlike other fertilizer with insect control" and references to other mixed insect controls. False or misleading comparisons with other pesticides are not acceptable.

If you have any questions regarding this letter, please contact Linda Werrell Gerber of my team at (703) 308-8033.

Sincerely,  
*Linda Werrell Gerber*  
George T. LaRocca  
Product Manager 13  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

2713

MASTER LABEL - TALSTAR® 0.086 LAWN GRANULAR INSECTICIDE WITH FERTILIZER

FRONT PANEL

**Talstar®**

**0.086 Lawn Granular Insecticide with Fertilizer XX-XX-XX<sup>1</sup>**

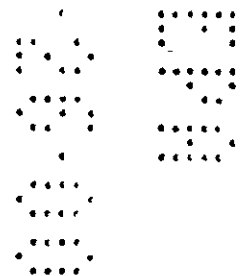
[photo: beautiful lawn] or [photo: insects and photo: grass]

Optional Branding

- Lawn Pro® "Available only at authorized Scotts® Lawn Pro® retailers"
- Scotts® Lawn Pro® Annual Program
- [seal] Annual SCOTT'S BEST Program
- Step 3™ of 4 Easy Steps to a Better Lawn
- Lawn Pro®
- (Scotts®)

Optional Product Descriptor

- Summer Lawn Fertilizer and Insect Control
- Summerizer® Fertilizer and Insect Control
- Insect Protection and Summer Fertilizer
- Insect Protection and Fertilization
- Insect Control with Fertilizer



Optional Front Panel Claims:

- Builds thick, green turf from the roots up without burning your lawn
- Kills insects that cause your lawn to thin and turn brown
- Kills fleas and ticks before they get on your pets
- Kills fleas and brown dog ticks before they get on your pets
- Corrects most lawn insect problems (for grub control, use Scotts® GrubEx®)
- All-in-One Particles™ provide even insect control and feeding!
- For best results, apply a Scotts Annual Lawn Care Program™ (see back for details)
- For best results, apply a Scotts Annual Program (see back for details)
- Controls many lawn insect problems
- Apply in Summer: June - August
- Scotts® Best Annual Program for a Picture Perfect Lawn
- Corrects many lawn insect problems
- Thicker, greener turf - satisfaction guaranteed
- Specially formulated with Scotts® Poly S® timed-release fertilizer, used by Landscape Professionals
- Controls chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme Disease), and other lawn pests listed on the back
- Contains both readily available nitrogen for quick green-up and controlled release nitrogen for uniform growth and extended feeding

[insert photo/illustration: chinch bug, sod webworm, lawn moth]

APPROVED  
 with COMMENTS  
 In EPA Letter Dated:  
 NOV 29 2000  
 under the Federal Insecticide,  
 Fungicide, and Rodenticide Act,  
 registered for the pesticide  
 registered under EPA Reg. No.  
 279-3203

<sup>1</sup> Note to EPA Reviewer - The fertilizer value will be filled in to match the Confidential Statement of Formula values.

3 7 13

**MASTER LABEL - TALSTAR® 0.086 LAWN GRANULAR INSECTICIDE WITH FERTILIZER**

[Front Panel Cont.]

13.33lb (XX.X kg) Treats and Feeds 5,000 square feet

**Optional Coverage Statements:**

39.99 lb (XX.X kg) Treats and Feeds 15,000 square feet

40.39 lb (XX.X kg) Treats and Feeds 15,150 square feet

EPA Reg. No. 279-3203

EPA Est. 279-XXX

Active Ingredient:	By Wt.
Bifenthrin.....	0.086%
Other Ingredients:.....	<u>99.914%</u>
	100.000%

†CAS# 82657-04-03

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

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
See back panel for additional precautionary statements.

XX-XX-XX (insert analysis here)

FMC Corporation  
Agricultural Products Group  
Philadelphia, PA 19103

MASTER LABEL - TALSTAR® 0.086 LAWN GRANULAR INSECTICIDE WITH FERTILIZER

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**[BOTTOM FRONT]**

Treats and Feeds XXXX Square Feet

[Above will be inverted on back of bag]

(Branding) Talstar 0.086 Lawn Granular Insecticide (XXXX – stock number)  
with Fertilizer

**[LEFT GUSSET]**

(UPC Code) Feeds and Treats (Branding) Talstar 0.086 Lawn (XXXX – stock number)  
XX,XXX Square Feet Granular Insecticide with  
Fertilizer

**[RIGHT GUSSET]**

(UPC Code) Feeds and Treats (Branding) Talstar 0.086 Lawn (XXXX – stock number)  
XX,XXX Square Feet Granular Insecticide with  
Fertilizer

[BACK PANEL]

[DIAGONAL LINE - SCISSORS ART]

-----CUT HERE TO OPEN-----

Optional Back Panel Claims

For best results, apply Scotts Annual Lawn Care Program™.

- Start the program at any time.
- Allow 2 months between applications.

The phrase "Scotts Annual Lawn Care Program" and the Scotts Fertilization Wheel Graphic are both trademarks of The Scotts Company and its related companies.

Winterizer™

Fertilizes to extend green period and promotes earlier green-up next Spring

LATE FALL (Oct. - Nov.)

Turf Builder® with Halts®

Fertilizes and prevents crabgrass

EARLY SPRING (Feb. - April)

Scotts®  
Annual Lawn  
Care Program™

Turf Builder®

Fertilizes for fall root growth

EARLY FALL (Aug. - Sept.)

Turf Builder® with Plus 2®

Fertilizes and controls broadleaf weeds

LATE SPRING (April - June)

Turf Builder® with Insect Control

Fertilizes and protects against insects

SUMMER (June - Aug.)

The Scotts Advantage™: All-in-One\* Particles™

Unlike other fertilizer with insect control products, All-in-One\* Particles™ contain plant nutrients and Scotts® exclusive insect control ingredient. Scotts® provides consistent feeding and insect control to every square inch of turf for a thick, green lawn. Guaranteed!

[Art]  
Talstar 0.086 Lawn  
Granular Insecticide  
With Fertilizer

[Art]  
Other Mixed  
Insect Controls

All-in-One\* Particles™ contain nutrients and Scotts® exclusive insect control ingredient for a thick, green lawn – guaranteed!

Nutrients and the insect control ingredient are often in separate particles which, if different sizes and shapes, can separate during application resulting in inconsistent insect control and feeding.

\*All-in-One = nitrogen, phosphorous, potassium and the insect control ingredient contained in every particle.

**OR**

(Scotts®) Value-Priced Annual Program\*

To improve your lawn, apply the Scotts Lawn Pro Value-Priced Annual Program. Start anytime! Just check the month and apply products at two-month intervals.

\*For an even better lawn, consider Scotts Best Annual Program, which provides more feeding and weed control. Your Lawn Pro retailer can help you with this selection.

[Illus. – Lawn Pro Crabgrass Preventer plus Lawn Fertilizer, Lawn Pro Weed and Feed, Lawn Pro Insect Control plus Lawn Fertilizer, Lawn Pro Lawn Fertilizer, Lawn Pro Super Winterizer]

Early Spring  
(February-April)

Prevents crabgrass and other weeds while feeding your lawn. (In the Pacific Northwest, substitute Turf Builder® with Moss Control. For St. Augustinegrass, substitute Super Bonus® S. For dormant Bermudagrass, substitute Halts®.)

Late Spring  
(April-June)

Kills dandelions and other broadleaf weeds while feeding your lawn. (For St. Augustinegrass, substitute Super Turf Builder®.)

Summer  
(June-August)

Kills lawn-damaging insects, fleas and ticks while feeding your lawn. For grub control, apply Scotts® GrubEx® anytime from late-April to mid-August.

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**Early Fall  
(August-September)**

The best time to feed for a thicker, greener lawn.

**Late Fall  
(September-November)**

Apply 4 to 6 weeks after the Early Fall application. This last feeding in fall will help prepare your lawn for winter.

**OR**

**(Scotts®) Lawn Pro® Annual Program  
Now it's easy for you to have a better lawn!**

**Start Anytime**

You can begin the Annual Program anytime of the year. Just check the month and select the appropriate STEP™ listed. Apply the remaining STEPs™ at two-month intervals.

**Simple and Easy**

No more guesswork! You simply apply the right product – one STEP at a time.

**Guaranteed Results**

Each STEP™ is designed for the specific season to help give you a greener lawn.

**Save Money**

Why even consider a lawn care service? Scotts Lawn Pro Annual Program will give you a beautiful lawn for about one-third the cost.

[ILLUS. The 4 STEP products listed below]

**STEP™ 1  
Early Spring  
February-April**

Crabgrass Preventer plus Fertilizer – prevents crabgrass, foxtail, spurge, oxalis, chickweed and other annual grassy weeds while providing deep, thick greening for up to 2 months. In the Pacific Northwest, STEP™ 1 is Turf Builder® with Moss Control. For St. Augustinegrass, STEP™ 1 is Super Bonus® S.

**STEP™ 2  
Late Spring  
April-June**

Weed Control plus Fertilizer – controls dandelion, clover, chickweed and other broadleaf weeds while greening your lawn for up to 2 months. For St. Augustinegrass, STEP™ 2 is Super Turf Builder®.

**STEP™ 3  
Summer  
June-August**

Insect Control with Fertilizer – controls chinch bugs, sod webworms (lawn moths) and other lawn insects while greening your lawn through the summer. For grub control, apply Scotts® GrubEx® anytime from late-April to mid-August.

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MASTER LABEL - TALSTAR® 0.086 LAWN GRANULAR INSECTICIDE WITH FERTILIZER

STEP™ 4  
Fall  
August-November

Lawn Fertilizer – specially formulated for the fall – the best time to develop a stronger root system for a more vigorous, thicker lawn.

Super Winterizer™  
Late Fall  
September-November

Apply 4 to 6 weeks after the Early Fall application. This last feeding in fall will help prepare your lawn for winter and will help your lawn green-up quicker next Spring.

OR

(Scotts®) Lawn Pro® Annual Program  
Now it's easy for you to have a better lawn!

Start Anytime

You can begin the Annual Program anytime of the year. Just check the month and select the appropriate STEP™ listed. Apply the remaining STEPs™ at two-month intervals.

Simple and Easy

No more guesswork! You simply apply the right product – one STEP at a time.

Guaranteed Results

Each STEP™ is designed for the specific season to help give you a greener lawn.

Save Money

Why even consider a lawn care service? Scotts Lawn Pro Annual Program will give you a beautiful lawn for about one-third the cost.

[ILLUS. The "Super" products listed below]

Super Turf Builder® with Halts® Crabgrass Preventer  
Early Spring  
February-April

Crabgrass Preventer plus Fertilizer – prevents crabgrass, foxtail, spurge, oxalis, chickweed and other annual grassy weeds while providing deep, thick greening for up to 2 months. In the Pacific Northwest, STEP™ 1 is Turf Builder® with Moss Control. For St. Augustinegrass, STEP™ 1 is Super Bonus® S.

Super Turf Builder® with Plus 2® Weed Control  
Late Spring  
April-June

Weed Control plus Fertilizer – controls dandelion, clover, chickweed and other broadleaf weeds while greening your lawn for up to 2 months. For St. Augustinegrass, STEP™ 2 is Super Turf Builder®.



**Super Turf Builder® with Insect Control  
Summer  
June-August**

Insect Control with Fertilizer – controls chinch bugs, sod webworms (lawn moths) and other lawn insects while greening your lawn through the summer. For grub control, apply Scotts® GrubEx® anytime from late-April to mid-August.

**Super Turf Builder®  
Fall  
August-November**

Lawn Fertilizer – specially formulated for the fall – the best time to develop a stronger root system for a more vigorous, thicker lawn.

**Super Winterizer™  
Late Fall  
September-November**

Apply 4 to 6 weeks after the Early Fall application. This last feeding in fall will help prepare your lawn for winter and will help your lawn green-up quicker next Spring.

**AND/OR**

Talstar 0.086 Lawn Granular Insecticide with Fertilizer is a high-performance product specially designed to be used in very low concentrations and is:

- Virtually Odor-free
- Fast Acting
- Easy-to-Use
- Broad Spectrum
- Kills Insects, Spiders and Ticks

**KEY PRODUCT FACTS**

**How and When to Apply**

**Directions for Use**

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

- Apply product to the entire lawn when insect activity or damage is first observed.
- Spread uniformly over your lawn using the suggested spreader settings. For best results, use a Scotts spreader.
- Apply product to a dry lawn.
- Water-in product after application.
- Do not use any other weed, disease, or insect control products for at least one week after application.
- For best results, apply a Scotts® Annual Lawn Care Program™ and allow two months between applications.
- For grub control, apply Scotts® GrubEx® between late April and mid-August.
- In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).
- Do not make a single repeat application of this product if there are signs of renewed insect activity but not sooner than two weeks after first application.

**MASTER LABEL - TALSTAR® 0.086 LAWN GRANULAR INSECTICIDE WITH FERTILIZER**

**What to Expect**

Talstar 0.086 Lawn Granular Insecticide with Fertilizer kills these lawn pests:

- Ants (carpenter, red harvester, pavement, odorous pyramid, argentine, and pharaoh (sugar)
- Armyworms
- Billbugs
- Centipedes
- Chiggers
- Chinch Bugs
- Crickets
- Cutworms
- Earwigs
- European Crane Fly
- Fleas
- Grasshoppers
- Leafhoppers
- Mealybugs
- Millipedes
- Scorpions
- Sod Webworms (lawn moth)
- Sow Bugs
- Spiders
- Ticks (including ticks that may transmit Lyme Disease)

**Spreading Tips**

Apply header strips. Then apply product in longest direction of lawn. For best results, use a Scotts® spreader.

**Spreader Settings**

	Covers XX,XXX sq. ft.	Directions
Scotts® Drop Spreaders	XXX	Mow lawn first; apply 2 header strips; apply longest direction of lawn, overlapping wheel marks.
Scotts® EasyGreen® Rotary	XXX	Make each pass about 30 inches from previous pass to overlap spread width.
Scotts® SpeedyGreen® Rotary	XXX	Make each pass about 5 feet from previous pass to overlap spread width.

**Additional Spreader Settings**

- EZ Drop, Republic (#530).....XX
- EZ Broadcast, Republic (#540).....XX

(Non-Scotts spreader settings are approximate. You may need to adjust for proper coverage.)  
[Illustrations: spreading patterns]

Optional Spreader information

To provide proper distribution, calibrate spreader before application. For best results, always use a Scotts® rotary spreader.

	Regular Rate Covers 15,150 Sq. Feet	Width of Coverage (in ft.)
Scotts ProRotary	X	X
Scotts AccuPro 2000 Rotary (cone 4)	X	X
SR 2000 Rotary (cone 4)	X	X
Scotts SpeedyGreen® Rotary	X	X
Scotts Broadcast Tractor	X	X

**First Aid and Environmental Information**

KEEP OUT OF REACH OF CHILDREN

**CAUTION**

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes and clothing. Wash thoroughly with soap and water after handling.

**Storage and Disposal**

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

STORAGE: Keep out of reach of children and animals. Store in original container only. Store in a cool, dry well-vented place and avoid excess heat. For bags after partial use, reseal opened bag by folding top down and securing.

CONTAINER DISPOSAL: Do not reuse empty bag. Discard bag in trash.

**FIRST AID**

**If in eyes:** Call A poison control center 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 on skin:** 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.

**If swallowed:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling poison control center or doctor, or going for treatment.

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

**Environmental Hazards:**

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

**Guaranteed Analysis**

Product Name	XX-XX-XX	F XXX
Total nitrogen (N).....	XX%	
XX.XX% ammoniacal nitrogen		
XX.XX% urea nitrogen		
XX.XX% other water soluble nitrogen *		
XX.XX% water insoluble nitrogen		
Available Phosphate (P <sub>2</sub> O <sub>6</sub> ).....	XX%	
Soluble Potash (K <sub>2</sub> O).....	XX%	
Sulfur (S).....	XX%	
XX% combined sulfur (S)		

Derived from: monoammonium phosphate, urea, methylene ureas, and potassium sulfate.

\*Contains X.X% slowly available methylenediurea and dimethylenetriurea nitrogen.

Your Do-It-Yourself Lawn Care Headquarters

Scotts Lawn Pro retailers can provide you with the do-it-yourself expertise and products to have a beautiful Scotts lawn simply and easily....for less money than hiring a lawn care service. That's why we call them Lawn Pros!

For additional questions, comments and information, contact the Scotts Lawn Pro retailer where you bought this product or you can contact Scotts directly!

[Phone Art]

**Questions/Information**

**Consumer Helpline:**  
**1-800-543-TURF (8873)**

[Computer Art]

**Visit our website:**  
[www.scottslawn.com](http://www.scottslawn.com)

The Scotts Company  
14111 Scottslawn Road  
Marysville, OH 43041

Scotts No-Quibble Guarantee®: (XXXX – stock number)  
If for any reason you are not satisfied with results after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

U.S. Pat. Nos. X,XXX,XXX and X,XXX,XXX  
Product of U.S.A.

©2001, The Scotts Company  
World rights reserved.

[UPC Code]

[BOTTOM BACK]

Feed and Treats XX,XXX Square Feet

[Above copy will be inverted]