

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

March 29, 2001

Mr. George Meindl FMC Corporation Agricultural Products Group 1735 Market Street Philadelphia, PA 19103

Subject:

Submission of Efficacy Data

Talstar® 0.086 Lawn Granular Insecticide with Fertilizer / EPA Reg. No. 279-3203

Talstar® 0.1 Lawn Granular Insecticide / EPA Reg. No. 279-3173

Your Submission Dated March 2, 2001

Dear Mr. Meindl:

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 listed 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.

- The efficacy data you submitted have been found acceptable, however, some of the pests require higher application rates than those listed on your label. Centipedes and millipedes require a rate of 4.8 lbs of product per 1000 square feet (0.2 lb ai/acre) and scorpions, sowbugs and pillbugs require a rate of 9.6 lbs of product per 1.000 square feet (0.4 lb ai/acre). Please delete these pests from your label. Please note that the necessity of higher application rates for centipedes. millipedes, sowbugs and pill bugs was inadvertently omitted in our correspondence of March 9, 2001. At that time we had only referenced scorpions (of the pests listed above) as needing the higher rate of application. We regret the error. Please update both labels accordingly. We have attached the entire efficacy review for EPA Reg. No. 279-3203 for your information.
- 2) Please fix your First Aid statement. It appears that you have exchanged the "If Swallowed" and "If In Eyes" information.

Per 40 CFR 156.10 (a)(5), please remove the statement "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" from your label.

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

Macy Genre T. LaRocca

Product Manager (13) Insecticide Branch

Registration Division (7505C)

IFRONT PANEL]

0.86 3_2_01 Label Amendment

this companies

the Federal Instaticide.

and Redentionle Act

for the posticide

Talstar®

0.086 Lawn Granular Insecticide with Fertilizer XX-XX-XX¹

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

Optional Branding

- Lawn Pro® "Available only at authorized Scotts® Lawn Pro® retaile:5"
- Scotts® Lawn Pro® Annual Program
- [seal] Annual SCOTTS BEST Program
- Step 3[™] of 4 Easy Steps to a Better Lawn
- Lawn Pro®
- (Scotts®)

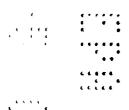
Optional Product Descriptor

- 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
- 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]



¹ Note to EPA Reviewer – The fertilizer value will be filled in to match the Confidential Statement of Ferritua values.

[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

tCAS# 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

[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

XX,XXX Square Feet

(Branding)

Talstar 0.086 Lawn

(XXXX - stock number)

Granular Insecticide with

Fertilizer

[RIGHT GUSSET]

[UPC Code]

Feeds and Treats XX,XXX Square Feet (Branding)

Talstar 0.086 Lawn

(XXXX – stock number)

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™

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

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

*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 3.)

Summer (June-August)

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

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 STEPTM listed. Apply the remaining STEPsTM 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]

STEPTM 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, STEPTM 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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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!

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Save Money

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[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 $2 \ensuremath{\mathfrak{B}}$ 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, steam, wetland, or drainage ditch).
- Do make a single repeat application of this product if there are signs of renewed insect activity but not scor.cr than two weeks after first application.

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

Leafhoppers

Billbugs

Mealybugs

Centipedes

Millipedes

Chiggers

Scorpions

Chinch Bugs

Sod Webworms (lawn moth)

Crickets

Sow Bugs

Cutworms

Spiders

Earwigs

Ticks (including ticks that may transmit Lyme Disease)

European Crane Fly

Fleas

Grasshoppers

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

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	(in ft.)	Width of Coverage
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	χ		Х	

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

<u>If in eyes</u>: 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.

<u>If on skin</u>: 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% am	moniacal nitrogen	
XX.XX% ure	a nitrogen	
XX.XX% oth	er water soluble nitrogen	*
XX.XX% was	ter insoluble nitrogen	
Available Phosphate (P2O5)	XX%

XX% combin		
Derived from: monoa	mmonium phosphate, ure	ea, methylene ureas, and potassium sulfate.
	, ,	•

^{*}Contains X.X% slowly available methylenediurea and dimethylenetriurea nitrogen.

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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

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.

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[UPC Code]

[BOTTOM BACK]

Feed and Treats XX,XXX Square Feet

[Above copy will be inverted]