

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM 03

432-837

9/30/98

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SEP 30 1998

Ms. Sharon M. Johnston
AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Dear Ms. Johnston:

Subject: Alternate CSF and Addition of Label Text Required by New York
DeltaGard GC Insecticide Granule
EPA Registration No. 432-837
Your Submissions Dated April 16 and May 12, 1998

Your request to add a fertilizer base to the subject product as an alternate formulation is unacceptable since such change in formulation and directions for use is considered a significant amendment requiring a separate application for registration.

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Delete all references to fertilizer, feeding lawns, and the alternate additional text providing fertilizer analysis from the label.
2. As required by PR Notice 93-7, place the "User Safety Recommendations" labeling statements in a box with lines or other graphic indicators to separate them from the surrounding text. This box should be placed after the paragraph pertaining to cleaning and maintenance of PPE and immediately before the "Environmental Hazards" section.
3. Revise the first sentence under Environmental Hazards to read: "This product is extremely toxic to fish and aquatic invertebrates." Also make this revision to the fourth sentence under GENERAL INFORMATION.

CONCURRENCES

SYMBOL	7505c 4.	In the rate table on page 2, revise the third paragraph under "Application				
SURNAME	LEAHY					
DATE	9/30/98					

Procedure" to read: "Use *the higher application rate* for subsurface pests . . ." to make clear that rates above 3 lbs product per 1000 ft. sq. are not permitted on these sites.

5. In the table listing spreader settings on page 3, it would be useful to the user to have rates also expressed in lbs per 1000 sq. ft.

6. Before printing the final labeling, insert the appropriate spreader settings into the table on page 3 to deliver the correct product dosage.

7. In the second paragraph under PERIMETER TREATMENT, delete from the first sentence the phrase, ". . . and to impart a temporary resistance at these places of attack which may aid in the prevention of immediate reinfestation." This statement implies that the use of this product prevents termite infestations. It has been determined that efficacy data to support this statement would be needed if you wish to retain this statement.

8. After the last sentence in the STORAGE AND DISPOSAL box, insert the following sentence: "If burned, stay out of smoke."

9. Insert the phrase "Restricted Use Pesticide" under the heading DIRECTIONS FOR USE also (see 40 CFR 156.10(i)(2)(ii)).

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact John Leahy of my team at (703) 305-6703.

Sincerely yours,

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

Enclosure

RESTRICTED USE PESTICIDE
Due To Acute Fish and Aquatic Organism Toxicity

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.

IN CASE OF MEDICAL EMERGENCIES OR HEALTH AND SAFETY INQUIRIES, OR IN CASE OF FIRE, LEAKING, OR DAMAGED CONTAINERS, INFORMATION MAY BE OBTAINED BY CALLING 1-800-XXX-XXXX.

FOR PRODUCT INFORMATION, CALL TOLL-FREE: 1-800-XXX-XXXX.

DELTAGARD™ GC
INSECTICIDE GRANULE

- [• Insecticide on Fertilizer]
- [• For Insect Control on Golf Courses, Sod Farms, Landscape Ornamental Plantings and Perimeters around Commercial, Industrial, Residential and Recreational Areas]
- [• Contains DeltaGard™]

ACTIVE INGREDIENT:
 Deltamethrin 0.1%

OTHER INGREDIENTS: 99.9%
 100.0%

DeltaGard is a trademark of AgrEvo Environmental Health, Inc.

ALTERNATE ADDITIONAL TEXT

[Fertilizer Analysis:
 Total Nitrogen (N) (%)
 Phosphorous (P) (%)
 Potash (K) (%)]

{Fertilizer analysis will vary. Numbers will be added to final container labeling.}

EPA Reg. No. 432-837

EPA Est. No.

PRECAUCION AL USARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente. **(TO THE USER:** If you cannot read English, do not use this product until the label has been fully explained to you.)

KEEP OUT OF REACH OF CHILDREN
CAUTION
FIRST AID

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

If In Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

PRECAUTIONARY STATEMENTS
Hazards To Humans & Domestic Animals
Caution

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

Food utensils such as spoons and measuring cups must not be used for food purposes after use in measuring pesticides. Do not allow children or pets on treated areas until granules have been watered into the soil and the grass or soil is dry.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Water-proof gloves
- Shoes plus socks

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.

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.

Environmental Hazards

This product is extremely toxic to fish. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when disposing of equipment washwater.

DIRECTIONS FOR USE

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

See Side Panel for Additional Precautions

SEP 30 1996

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

432-837

if a person is sensitive to bromates

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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) and restricted-entry interval. 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 into 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
- Waterproof gloves
- 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 Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Wear protective clothing when using or handling this product to help avoid exposure to eyes and skin. Eye protection, gloves, a long-sleeved shirt and long-legged pants or coveralls are recommended.

Do not allow adults, children or pets on treated areas until granules have been watered into the soil and the grass or soil is dry.

GENERAL INFORMATION: DeltaGard GC Insecticide Granule is a broad spectrum residual pyrethroid insecticide for the control of major surface-feeding insect pests on golf courses, sod farms, ornamental landscape plantings and perimeters around commercial, recreational, and residential areas. DeltaGard GC Insecticide Granule is 0.1%

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deltamethrin formulated on a [water-soluble] [fertilizer] carrier. Treat as directed. This product is extremely toxic to fish. Use with care when applying in areas adjacent to any body of water. Do not apply on saturated soil. Do not allow runoff to occur. Do not contaminate ornamental fish ponds.

In New York State, product may not be applied to turf within 100 feet of a coastal marsh or stream that drains directly into a coastal marsh. For control of turf insects in New York State, a second application may be made after two weeks if target insect activity persists.

RECOMMENDATIONS FOR TURFGRASSES, LANDSCAPE ORNAMENTAL PLANTING AND PERIMETER TREATMENTS:

Apply DeltaGard GC Insecticide Granule with suitable and calibrated application equipment to give complete and uniform coverage of pest infested areas. Applications should be made using the rates shown below.

Pest	Dosage of Product	Application Procedure
Annual bluegrass weevil (hyperodes adults), ants, armyworms, bermudagrass mites, billbugs (adult), black turfgrass ataenius, boxelder bugs, centipedes, chiggers, chinch bugs, clover mites, cockroaches, crickets, cutworms, darkling ground beetles, digger wasps, essex skipper, field crickets, fiery skipper, fire ants, flea beetles, fleas, grasshoppers, Japanese beetles (adult), lawn moths, leafhoppers, mealy bugs (adult), scorpions, sod webworms, sowbugs, spiders, spittlebugs, springtails, ticks (including Lyme disease vectors), vegetable weevils	2 to 3 pounds per 1000 sq. ft.	Treat when insects first appear.
	OR	Apply this product uniformly to the pest infested area.
	0.08 to 0.13 lbs ai/A	Use higher application rates for subsurface pests and/or for extended residual control.
	OR	For optimum results, irrigate with an adequate quantity of water to thoroughly moisten grass and thatch and dissolve the insecticide granules.
	87 to 131 lbs/A	
Mole crickets	2 to 3 pounds per 1000 sq. ft.	In order to improve efficacy [For optimum results], irrigate as soon as possible with 1/2 to 1/2 inch of water.

FINE TURF USE PRECAUTIONS: On fine turf, such as creeping bentgrass putting greens, tees and fairways, irrigate immediately after application with an adequate amount of water to completely dissolve the granule. DO NOT apply this product to creeping bentgrass when air temperatures are 80°F or greater.

APPLICATION EQUIPMENT:

ALTERNATE ADDITIONAL TEXT

Recommended Spreader Settings for Broadcast Applications

{Numbers to be added to final container labeling}

Equipment	Ground Speed (mph)	Spreader Setting	
		87 lbs/A Once	130.7 lbs/A Twice
Hand-Pushed			
LESCO Rotary	3		
Scotts R-8A-1 Rotary	3		
Gandy Model 42H2C	3		
Equipment Drawn (PTO - 540 RPM)			
Gandy (8 foot)	4.5		
Lely 2.3202.000.1	4.5		
Lely Model L-400	4.5		
Vicon PS402	4.5		
Vicon PS10021	4.5		

NOTE: These recommended settings should be used as starting points when calibrating a spreader to achieve the desired application rate of DeltaGard GC Insecticide Granule.

Spreaders should be calibrated periodically to ensure that equipment wear or other factors have not altered the flow rate of DeltaGard GC. Calibration instructions are included in the Owner's Manual that was provided by the equipment manufacturer at the time of purchase. After calibration, the technician should regularly observe the amount of DeltaGard GC Insecticide Granule that is applied to a known area and make further setting adjustments, as necessary, to maintain the appropriate application rate.

PERIMETER TREATMENT: To help prevent infestation of buildings by *Ants, Boxelder Bugs, Brown Dog Ticks, Centipedes, Cockroaches, Clover Mites, Crickets, Field Crickets, Fire Ants, Fleas, Scorpions, Sowbugs, Spiders, Springtails (Collembola), Termites* and *Ticks*, treat a band 5 to 10 feet wide around and adjacent to the building where pests are active and may find entrance. Treat at a rate of 1 to 1 1/2 pounds per 500 sq. ft. or 2 to 3 pounds per 1000 sq. ft.

For termites, the purpose of such applications of DeltaGard GC Insecticide Granule is to kill workers or winged reproductive forms which may be present at the time of treatment, and to impart a temporary resistance at these places of attack which may aid in the prevention of immediate reinfestation. Such applications are not a substitute for mechanical, alteration, soil treatment or foundation treatment but are merely a supplement.

SPOT TREATMENT: To control *Ants, including Acrobat, Argentine, Big Headed, Cornfield, Harvester, Leafcutter, Little Black, Pavement* and *Pyramid Ants*. If possible, locate and treat nest first. Product should be

applied to thoroughly cover the nest (1 to 2 teaspoons) and sprinkled with sufficient water to dissolve granules. In addition to treating ant nests or mounds, entry points of buildings and the soil surface along the perimeter of the building should be treated.

IMPORTED FIRE ANTS: Apply up to 1 tbsp. over each 10" to 12" diameter mound and up to 2 feet around each mound to prevent escape of the queen. Immediately after application, water the granules into the soil gently with a light sprinkling can to avoid disturbing the colony. Use at least 1 gallon of water per mound. Apply in cool weather during the spring and fall (65 - 80°F) or in early morning or late evening for best results. Treat new mounds as they appear. If possible, make applications after a recent rainfall.

FLOWER, SHRUB, ORNAMENTAL PLANT BEDS: To control *Ants, Fire Ants, Centipedes, Cockroaches, Crickets, Cutworms, Sowbugs, Pillbugs, Grasshoppers, Armyworms, Scorpions, Spiders, Springtails* and *Ticks*, apply granules evenly over soil within the beds and under shrubbery. Use the same dosage recommended for control of these pests in lawns. For optimum results, irrigate with an adequate quantity of water to thoroughly moisten treated area and dissolve the insecticide granule. Do not use on or around fruit and nut trees, vegetable plants or around any plants used for food.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Storage:** Store in original container in a secured, dry storage area. Prevent cross-contamination with other pesticides and fertilizers. If container is leaking or material is spilled, sweep up and remove to chemical waste area. **Pesticide Disposal:** Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Completely empty container (by shaking and tapping sides and bottom) into application equipment. Dispose of container in a sanitary landfill or by incineration if allowed by State and local authorities.

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

IMPORTANT: READ BEFORE USE

By using this product, user or buyer accepts the following conditions, warranty, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, because of extreme weather conditions and soil conditions, manner of use and other factors beyond AgrEvo Environmental Health's control, it is impossible

See comments for 9507

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Buyer assumes all responsibility for safety and use not in accordance with directions.

for AgrEvo Environmental Health to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED OF MERCHANTABILITY OR OF FITNESS FOR PARTICULAR PURPOSE OR OTHERWISE, WHICH EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of AgrEvo Environmental Health is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. AgrEvo Environmental Health disclaims any liability whatsoever for incidental or consequential damages, including, but not limited to, liabilities arising out of breach of contract, express or implied warranty (including warranties of merchantability and fitness for a particular purpose), tort, negligence, strict liability or otherwise.

LIMITATION OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT AGREVEO ENVIRONMENTAL HEALTH'S ELECTION, THE REPLACEMENT OF PRODUCT.

AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

NET CONTENTS:

[Denotes alternate text]

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SUPPLEMENTAL LABELING

DELTAGARD™ GC GRANULAR INSECTICIDE
EPA REG. NO. 432-837

Recommendations

For Use of DeltaGard GC Granular Insecticide On Creeping Bentgrass and Other Closely Mowed, High Maintenance Turf.

DeltaGard GC Granular Insecticide contains 0.1% Deltamethrin pyrethroid on an ammonium sulfate carrier. When applied at the recommended rate of 2 to 3 lb of product per 1000 ft² to control insects on turfgrass sites, this product will supply 0.4 to 0.6 lb soluble nitrogen per 1000 ft² from the ammonium sulfate carrier.

To reduce the potential of foliar burn to creeping bentgrass and other closely mowed, high maintenance turf, utilize the following precautions:

- After applying this product, irrigate immediately to reduce the potential of turf injury. This is particularly important if the application has been made to wet turfgrass foliage. Irrigation after application with adequate amounts of water completely dissolves the granules and reduces the potential of foliar burn. Allowing this product to dry on the foliage increases the potential for turf injury and is not advised.
- Application to creeping bentgrass when air temperatures are 80 °F or greater increases the potential for foliar burn and is not advised.
- Application of this product to turfgrasses under conditions in which ammonium sulfate alone would cause foliar burn (such as when the foliage is wet, when the temperatures are high, when the relative humidity is low, or when the product is not watered-in) is not advised.

