



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Richard Gorrell
Aventis Environmental Science USA LP
95 Chestnut Ridge Road
Montvale, NJ 07645

NOV 20 2000

Dear Mr. Gorrell:

Subject: Final Print Label Review
DeltaGard GC
EPA Reg. No. 432-837
DeltaGard T & O
EPA Reg. No. 432-836
Delta GC
EPA Reg. No. 432-867
Delta G
EPA Reg. No. 432-868
Your Submission Dated August 14, 2000

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments given below. Changes indicated below are directed at all labels referenced above.

Regarding the labels:

1. In the letter dated February 22, 2000, you were directed to amend the listing for ticks. Specifically, you were directed to reword information related to potential lyme disease vectors under DIRECTIONS FOR USE, table which lists pests, dosage of product and application procedure to: "... (including those which may vector lyme disease)".
2. EPA has issued a PR Notice revising first aid statements (PR Notice 2000-3). The following are the revised statements that will be required for products placed in category III and above. You may wish to incorporate these statements on your labeling at this time:

"IF SWALLOWED: 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 a poison control center or doctor. IF ON

SKIN OR CLOTHING: 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 IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center 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 mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice."

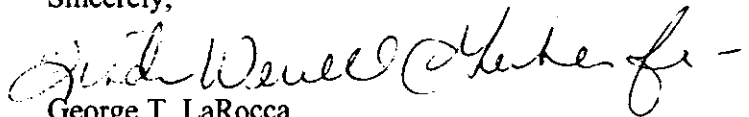
Also, add the following statement near the first aid statements: "Have the product container or label with you when calling a poison control center or doctor or going for treatment."

EPA recommends that these statements be boxed and bulleted to present the information in a clear, easy-to-read fashion.

- 3. Submit three copies for each above referenced product of the complete labeling revised in accordance with the above comments.

Stamped labeling is enclosed for your records. If you have any questions regarding this letter, please contact Linda Werrell Gerber of my team at (703) 308-8033.

Sincerely,



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

Enclosure

Best copy available



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.

DELTA® GC

- * INSECTICIDE ON FERTILIZER
- * FOR INSECT CONTROL ON GOLF COURSES, SOD FARMS, LANDSCAPE ORNAMENTAL PLANTINGS AND PERIMETERS AROUND COMMERCIAL, INDUSTRIAL, RECREATIONAL, AND RESIDENTIAL AREAS.
- * CONTAINS DeltaGard™

ACTIVE INGREDIENT:

Deltamethrin:	0.1%
OTHER INGREDIENTS:	99.9%
	100.0%

Fertilizer Analysis	
Total Nitrogen (N)	23
Phosphorus (P)	23
Potash (K)	23
<i>{Fertilizer analysis will vary. Numbers will be added to final container labeling.}</i>	

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

EPA Reg. No. 432-867

EPA Est. No.

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 1-800-334-7577.

FOR PRODUCT INFORMATION, CALL TOLL-FREE: 1-800-331-2867

See Side Panel For Additional Precautions

NET CONTENTS:

ACCEPTED
with COMMENTS
In EPA Letter Dated:

NOV 20 2000

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

432-867



AVENTIS ENVIRONMENTAL SCIENCE USA LP

95 Chestnut Ridge Road Montvale, NJ 07645

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

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.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. 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
RESTRICTED USE PESTICIDE**

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

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 state

ments 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: Delta 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. Delta GC Insecticide Granule is 0.1% deltamethrin formulated on a fertilizer carrier. Treat as directed. This product is extremely toxic to fish and aquatic invertebrates. 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.

Apply this product as prescribed on this label but not more than once per week during the growing season.

To avoid marking or discoloration of concrete surfaces (patios, sidewalks, pavers, or similar material), it is recommended that granules applied to these surfaces be removed.

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 PLANTINGS AND PERIMETER TREATMENTS:

Apply Delta 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:

Pests	Dosage of Product	Application Procedure
Annual bluegrass weevil (<i>Hyperodes adults</i>), Ants, Armyworms, Bermudagrass mites, Billbugs (adult), Black turfgrass ataenius, Boxelder bugs, Centipedes, Chiggers, Chinchbugs, Clover mites, Crickets, Cutworms, Darkling Ground beetles, Digger wasps, Essex skipper, Field crickets, Fiery skipper, Fire ants, Flea beetles, Grass hoppers, Japanese beetles (adult), Lawn moths, Leafhoppers, Mealybugs (adult), Sodwebworms, Sowbugs, Spiders, Spittlebugs, Springtails, Ticks (including Lyme disease vectors) and Vegetable weevils	2 to 3 pounds/ 1,000 sq. ft. OR 0.08 to 0.13 lbs ai/A OR 87 to 131 pounds/A	Treat when insects first appear. Apply this product uniformly to the pest infested area. Use the higher application rate for subsurface pests and/or for extended residual control. For optimum results, irrigate with an adequate quantity of water to thoroughly moisten grass and thatch, and dissolve the insecticide granules.
Mole crickets	2 to 3 pounds per 1,000 sq. ft.	In order to improve efficacy [For optimum results], irrigate as soon as possible with 1/4 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	
		Once	Twice
Hand-Pushed		87 lbs per acre	1301 lbs per acre
LESCO Rotary	3		
Scotts R-BA-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 the 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 of Delta GC Insecticide Granule. 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 Delta GC Insecticide Granules 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, Clover Mites, Crickets, Field Crickets, Fire Ants, 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 1,000 sq. ft.

For termites, the purpose of such applications of Delta GC Insecticide Granule is to kill worker or winged reproductive forms which may be present at the time of treatment. 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 ANT MOUND TREATMENT: Apply up to two tablespoons over each 8" to 10" 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 AND ORNAMENTAL PLANT BEDS: To control *Ants, Fire Ants, Centipedes, Crickets, Cutworms, Sowbugs, Pillbugs, Grasshoppers, Armyworms, Spiders, Springtails and Ticks* apply granules evenly over soil within the beds, and under shrubbery. Use the same dosage recommended for the 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 bag (by shaking and tapping sides and bottom) into application equipment. Dispose of bag in a sanitary landfill or by incineration if allowed by state and local authorities. If burned, stay out of smoke.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

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, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Aventis Environmental Science USA LP. All such risks shall be assumed by the user or buyer.

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