

432-1308

11/30/2009

1/8

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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Dr. Norma C. Pangilinan
Registrations Manager
Bayer Environmental Science SA
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Dear Dr. Pangilinan:

Subject: Dylox® 6.2 Granular Insecticide
EPA Registration Number 432-1308
Submissions dated August 27, 2009, and November 11, 2009

The proposed amended label submitted on August 27, 2009, in response our letter dated August 5, 2009, is not accepted as that label was replaced by the label submitted on November 11, 2009

The proposed amended label submitted on November 11, 2009, is accepted under the provisions of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, with the further stipulation that the changes listed below must be made to that label.

1. On page 2, under the heading "**DIRECTIONS FOR USE:**", delete the word "**NOTE:**" so that the sentence "**Do not use on turf being ... purposes**" is part of the "**IMPORTANT:**" paragraph.
2. Change last sentence of the "**ENTRY RESTRICTIONS**" paragraph to read as shown below.

For home lawns, notify the property owner that he or she must water-in the product promptly or within the same day.
3. Capitalize the heading "**Restrictions**" so that it appears as "**RESTRICTIONS**" (in the box below the "**ENTRY RESTRICTIONS**" paragraph (on page 2).
4. Change the last 3 items listed under "**RESTRICTIONS**" to read exactly as shown below.
 - The applicator must water-in the product after application or notify the property owner that he or she must water-in after application, on the same day.

- Limit the number of applications to turf to 3 per calendar year with minimum retreatment intervals of 7 days.
 - Limit the total of all applications to 24.5 lbs of active ingredient (395 lbs of product) per acre per year for controlling mole crickets and grubs and to 16.2 lbs of active ingredient (261 lbs of product) per acre per year for controlling surface-feeding insects.
5. Edit the second of the 3 bulleted items listed under “**Additional Restrictions for Turf on Golf Courses**” to read as shown below.
 - Broadcast use is limited to tees and greens. Use on fairways is limited to spot treatments.
 6. On page 3, in the “Where to Apply” line of the “**PRODUCT SPECIFICATIONS:**” table, change “See Note above” to “See **IMPORTANT:** above.”
 7. Change the fourth bulleted item opposite “How to Apply” in the “**SURFACE FEEDING INSECTS**” table to read as shown below.
 - To release the active ingredient from the granule, the applicator must water-in after application or notify the property owner that he or she must water-in, on the same day as application, with sufficient water to thoroughly wet the remaining thatch. If sufficient rainfall to thoroughly wet the thatch occurs after application but before watering-in, additional watering-in is not required.
 8. In the second bulleted item opposite “When to Apply” in the “**SURFACE FEEDING INSECTS**” table, change “30 to 40 day intervals” to “30- to 40-day intervals”. This change is needed to make it clear that the intervals are to be 30-40 days long, rather than 30 to 40 one-day intervals.
 9. In the second bulleted item opposite “How to Apply” in the “**ROOT FEEDING INSECTS**” table (on page 4), replace “For best results, ensure” with “Ensure”.
 10. Change the fifth bulleted item opposite “How to Apply” in the “**ROOT FEEDING INSECTS**” table to read as shown below.
 - The applicator must water-in after application or notify the property owner that he or she must water-in, on the same day as application, with sufficient water to thoroughly wet the remaining thatch and move the product to the root zone. If sufficient rainfall to thoroughly wet the thatch occurs after application but before watering-in, additional watering-in is not required.

A stamped copy of the label is enclosed for your records.

Submit two copies of final printed labeling before releasing this product for shipment under the labeling accepted via this letter.

The data requirements identified in Ms. Kylie Rothwell's letter of March 11, 2009, remain applicable.

If these conditions are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6(e).

If you have any questions regarding this letter, you may reach me by phone at 703-305-6406, by FAX at 703-308-0029, or via e-mail at jacobs.bill@epa.gov.

Sincerely yours,



William W. Jacobs
Insecticide-Rodenticide Branch
Registration Division (7505P)

4/8

Dylox[®] 6.2 Granular Insecticide

For Control of White Grubs, Mole Crickets, Sod Webworms, Cutworms and Other listed Pests of Turfgrass .
Controls damaging insects below the soil surface.

Provides control of Japanese beetle grubs.

ACTIVE INGREDIENT:

Trichlorfon, Dimethyl (2,2,2-trichloro-1-hydroxy-ethyl)phosphonate 6.2%

INERT INGREDIENTS: 93.8%

100.0%

STORE IN A DRY PLACE

Treats 10,000 sq ft for White Grubs and Mole Crickets

Treats 15,000 sq ft for Sod Webworms

EPA Reg. No. 432-1308

EPA Est. No. ____

NET CONTENTS: 30 lbs

**STOP - Read the label before use.
Keep Out of Reach of Children.**

CAUTION

PARA EL USUARIO: Si usted no lee o entiende inglés, no use este producto hasta que le hayan explicado completamente las instrucciones que figuran en la etiqueta.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577

For PRODUCT USE Information Call 1-800-331-2867

FIRST AID

Contains an organophosphate that inhibits cholinesterase.

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 by a poison control center or doctor.
- Do not give anything to an unconscious person.

IF IN EYES:

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

Have the product container or label with you when calling a poison control center or doctor or going for treatment. The Bayer Environmental Science Emergency Response Telephone No. is 1-800-334-7577.

Note To Physician: Prolonged exposure will cause cholinesterase depression. Atropine Sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Causes moderate eye irritation. Do not take internally. Do not breathe dust. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some people.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, Loaders, Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

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

ACCEPTED

With COMMENTS.

In EPA Letter Dated:

NOV 30 2009

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

432-1308

User Safety Recommendations

Users should:

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

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply when turf grass areas are water-logged or the soil is saturated with water (i.e. will not irrigate). Avoid run-off or puddling of irrigation water following application. Use only as directed on this label. Do not use on crops used for food or forage.

DIRECTIONS FOR USE

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

IMPORTANT: Read these entire Directions for Use before using DYLOX 6.2 Granular Insecticide.

NOTE: Do not use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

ENTRY RESTRICTIONS

Do not enter or allow others to enter the treated area (except those persons involved in the incorporation) until the incorporation is complete. Incorporation is to be accomplished by watering-in. Do not enter or allow others to enter the treated area until the surface is dry after the watering-in. For home lawns, notify the property owner that he/she must water-in.

Restrictions

- 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.
- Aerial application is prohibited.
- Use this product only on the turf sites permitted by this label.
- Do not apply this product using hand-held or chest-mounted spreaders.
- The applicator must water in after application, or notify the property owner that he/she must water in.
- Limit the number of applications to turf to 3 per calendar year with minimum retreatment intervals of 7-day.
- Limit the application to 24.5 lbs of a.i./A per year for controlling grubs and mole crickets and 16.2 lbs of a.i./A per year for controlling surface feeding insects.

Additional Restrictions For Turf on Golf Courses

- Do not apply within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes, natural ponds, or estuaries.
- Broadcast use is limited to tees and greens, use on fairways is limited to spot treatments.
- Post-application watering-in is mandatory.

6/8

PRODUCT SPECIFICATIONS	
Dylox 6.2	<ul style="list-style-type: none"> Granular Insecticide containing 6.2% trichlorfon
Controls	<ul style="list-style-type: none"> White Grub Larvae (such as larvae of Asiatic garden beetle, black turfgrass atenioides, European chafer, green June beetle, Japanese beetle, <i>Aphodius</i> spp., May or June beetles (<i>Phyllophaga</i> spp.), northern and southern masked chafers (<i>Cyclocephala</i> spp.), oriental beetle and sugarcane grubs (<i>Tomarus</i> spp.)) Mole crickets Annual bluegrass weevil Billbug larvae Sod webworms and cranberry girdler Cutworms and armyworms Chinch bugs
Where to Apply	<ul style="list-style-type: none"> All types of turf where pests have been seen or found excluding turf where application is not allowed. See Note above.
Coverage	<ul style="list-style-type: none"> One bag (30 lbs) will treat 10,000 sq. ft. for white grubs, annual bluegrass weevil, chinch bugs, cranberry girdler and mole crickets. One bag (30 lbs) will treat 15,000 sq. ft. for sod webworms, armyworms and cutworms.
How to Apply	<ul style="list-style-type: none"> Do not apply with hand-held or chest-mounted spreader. Apply granules using a broadcast or drop type spreader.
Questions	For questions or comments, call toll free 1 (800) 331-2867.

SURFACE FEEDING INSECTS	
Sod webworm, cranberry girdler, cutworm, and armyworm	
Use Rate	<ul style="list-style-type: none"> 2 pounds per 1,000 sq. ft. of turf. Refer to chart for spreader settings (Make sure your spreader is calibrated for this product before application).
How to Apply	<ul style="list-style-type: none"> Turf should be free of troublesome thatch, which encourages insects. Rake or de-thatch the area and remove the debris to expose insect hiding places. Water the turf and cut to proper height. Apply granules with a broadcast or drop type spreader. To release the active ingredient from the granule, the applicator must water-in after application or notify the property owner that he/she must water-in with sufficient water to thoroughly wet the thatch, if rainfall does not occur within 24 hours.
When to Apply	<ul style="list-style-type: none"> Treat when the insects are present. To control multiple generations of sod webworm larvae, additional treatments at 30 to 40 day intervals during the summer months may be required. Do not make more than 3 applications per calendar year.

Surface Feeding Insects - 2 lb/1,000 sq ft	
Surface Feeding Insects - 2 pounds per 1,000 sq ft	
Spreader	Setting
Cyclone Pro	4
Cyclone-Roto	3
Lely Broadcast	2.5
Lesco Rotary	11
Prize CB85, CB T85	4.5
Scott's Drop	4
Scott's R7X	H
Spyker Pro	4
Greenview (Model 105)	6.5
Earthway (Model 2600)	8
Sears Broadcast	3.5
Sears Drop	6

(30 pounds will treat 15000 sq ft at this rate)

ROOT FEEDING INSECTS

annual bluegrass weevil (larvae)
 Billbugs (larvae)
 cranberry girdler
 mole crickets
 chinch bugs
 white grub larvae: larvae of Asiatic garden beetle, black turfgrass ataenius, European chafer, green June beetle, Japanese beetle, *Aphodius spp.*, May or June beetles (*Phyllophaga spp.*), northern & southern masked chafers (*Cyclocephala spp.*), Oriental beetle, and sugarcane grubs (*Tomarus spp.*)

Use Rate

- 3 pounds per 1,000 sq. ft. of turf.
- Refer to chart for spreader settings (Make sure your spreader is calibrated for this product before application).

How to Apply

- Turf should be free of troublesome thatch, which encourages insects.
- For best results, ensure that there is no more than ½ inch of thatch present at time of application. Under dry conditions, where thatch is present, prewatering is recommended prior to application for control of white grub and weevil larvae.
- Water the turf and cut to proper height.
- Apply granules with a broadcast or drop type spreader.
- The applicator must water-in after application or notify the property owner that he/she must water-in in order to move the product into the root zone with sufficient water to thoroughly wet the thatch and top layers of the soil, if rainfall does not occur within 24 hours.

When to Apply

- Apply when pests are seen or found.
- Consult your Agricultural Extension Service for the best time to treat in your area.
- A second treatment may be needed for mature large sized grubs.

Root Feeding Insects - 3 lb/1,000 sq ft)

Spreader	Setting
Cyclone Pro	4.75
Cyclone-Roto	3.5
Lely Broadcast	2.9
Lesco Rotary	14
Prize CB85, CB T85	5
Scott's Drop	4.5
Scott's R7X	J
Spyker Pro	4.7
Greenview (Model 105)	7.5
Earthway (Model 2600)	10
Sears Broadcast	4
Sears Drop	7

(30 pounds will treat 10000 sq ft at this rate)

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

- Store in its original container in a cool, dry, locked place out of reach of children.

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:

- Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Offer for recycling, if available or dispose of empty bag in a sanitary landfill.

8/8

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, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond Bayer CropScience LP's control it is impossible for Bayer CropScience LP 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: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE LP MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience LP is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, Bayer CropScience LP disclaims any liability whatsoever for special, incidental or consequential damages, resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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 BAYER CROPSCIENCE LP'S ELECTION, THE REPLACEMENT OF PRODUCT.

PRODUCED FOR



Bayer Environmental Science

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Dylox 6.2G (PENDING) 05/04/09, Resubmitted 08/26/09, Resubmitted 11/11/09