



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 10, 2015

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

Subject: Label and CSF Amendment – Amendment to add marketing and fertilizer claims,
and to revise the CSFs to state the % Nitrogen in the formulation
Product Name: Merit 0.15 Plus Turf Fertilizer
EPA Registration Number: 432-1353
Application Dates: September 23, 2014; January 28, 2015
Decision Numbers: 496194; 499772

Dear Ms. Pangilinan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 02/02/15
- Alternate CSF1 dated 02/03/15

Any CSFs other than those listed above are superseded/no longer valid.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Gene Benbow by phone at 703-347-0235 or via email at Benbow.Gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Venus Eagle", with a stylized flourish at the end.

Venus Eagle, PM 01
Invertebrate & Vertebrate Branch 3
Registration Division
Office of Pesticide Programs

Enclosure

Merit[®] 0.15 Plus Turf Fertilizer

For fertilization and insect control in turfgrass and landscape ornamentals

Fertilizer with MERIT Insecticide

[Coleoptera: Scarabaeidae Image]

Editorial Note – [Bracketed text] is optional language

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 0.15%

OTHER INGREDIENTS:..... 99.85%

TOTAL:..... 100.0%

[Fertilizer Analysis: X-X-X]

EPA Reg. No. 432-1353

EPA Est. No. ____

Merit[®] is a registered trademark of Bayer.

**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

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.
- Do not give anything by mouth to an unconscious person.

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 eye.
- 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. You may also contact 1-800-334-7577 for emergency medical treatment.

NOTE TO PHYSICIAN: No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

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

ENVIRONMENTAL HAZARDS

ACCEPTED

03/10/2015

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

432-1353

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

DIRECTIONS FOR USE

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

APPLICATION TO TURFGRASS

The use of this product will provide plant nutrients as well as providing control of selected insect pests. Merit® 0.15 Plus Turf Fertilizer can be used for the control of soil inhabiting pests of turfgrass; for example northern & southern masked chafers, *Cyclocephala borealis*, *C. immaculata*, and/or *C. lurida*; Asiatic garden beetle, *Maladera castanea*; European chafer, *Rhizotrogus majalis*; Green June beetle, *Cotinus nitida*; May or June beetles, *Phyllophaga* spp.; Japanese beetle, *Popillia japonica*; Oriental beetle, *Anomala orientalis*; sugarcane beetle, *Euethola humilis rugiceps*; billbugs, *Sphenophorus* spp.; annual bluegrass weevil, *Listronotus maculicollis*; Black turfgrass ataenius, *Ataenius spretulus*; *Aphodius* spp.; crane flies, *Tipula* spp., and mole crickets, *Scapteriscus* spp.. Use Merit 0.15 Plus Turf Fertilizer as directed on turfgrass including home lawns, school grounds, nursing homes and hospital grounds, city, county, state, municipal and federal grounds, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, churches, cemeteries, parks, playgrounds, and athletic fields. Do not use Merit 0.15 Plus Turf Fertilizer on commercial sod farms.

APPLICATION RATES		
CROP	PEST	DOSAGE MERIT + TURF FERTILIZER
Turf Grasses	Billbugs Larvae of: <i>Aphodius</i> spp. Black turfgrass ataenius European chafer Japanese beetle Sugarcane beetle	167 to 267 lb per acre or 3.8 to 6 lb per 1,000 sq ft
	Annual bluegrass weevil Billbugs Crane flies Larvae of white grubs, for example: <i>Aphodius</i> sp. Asiatic garden beetle Black turfgrass ataenius European chafer	Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer Sugarcane beetle
	200 to 267 lb per acre or 4.6 to 6 lb per 1,000 sq ft	
	For optimum control, make application prior to egg hatch of the target pest. Be sure to read "APPLICATION EQUIPMENT" Section of this label.	
	Mole crickets Chinch bugs (suppression)	267 lb per acre or 6 lb per 1,000 sq ft
	For suppression of chinch bugs, make application prior to the hatching of the first instar nymphs For optimum control of mole crickets; make application prior to or during the period of peak egg hatch. If application is not made prior to egg hatch and adults or large nymphs are present and actively tunneling, apply Merit 0.15 Plus Turf Fertilizer in combination with a remedial insecticide to minimize damage to turf.	
Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application.		
USE RESTRICTIONS		
- Do not apply more than 267 lb (0.4 lb of active ingredient) per acre per year. - Do not apply to soils which are waterlogged or saturated, which will not allow penetration into the root zone of the plant. - For optimum control, irrigate if rainfall does not occur within 24 hours after application to move the active ingredient through the thatch. - On golf courses, irrigate treated areas following application. - For optimum control, mow turf or lawn area only after irrigation or rainfall has occurred so that uniformity of application will not be affected. - Avoid runoff or puddling of irrigation water following application.		

The active ingredient in Merit 0.15 Plus Turf Fertilizer has sufficient residual activity so that applications can be made preceding the egg laying activity of the target pests. High levels of control can be achieved when applications are made proceeding or during the egg laying period. The need for an application can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Optimum control will be achieved when applications are made prior to egg hatch of the target pest, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The treated turf must be in such a condition that the rainfall or irrigation will penetrate vertically into the soil profile.

APPLICATION TO ORNAMENTALS

Merit 0.15 Plus Turf Fertilizer can be used as a broadcast application on ornamentals in commercial and residential landscapes, as well as on landscaped areas of golf courses and other recreational areas. This is a systemic product, with the active ingredient being absorbed by the roots and translocated upward within the plant. Optimum control will be achieved when applications are followed by sufficient mechanical incorporation, irrigation, or rainfall to place the active ingredient into the soil. Make application prior to anticipated pest infestation to achieve optimum levels of control.

Applications of Merit 0.15 Plus Turf Fertilizer cannot exceed a total of 267 lb (0.4 lb of active ingredient) per acre per year.

RESTRICTION: Not for use in commercial greenhouses, or nurseries, or on sod farms.

APPLICATION RATES FOR USE ON ORNAMENTALS		
SITE	PEST	DOSAGE MERIT + TURF FERTILIZER
Landscape Plantings Including: Trees, Shrubs, Evergreens, Flowers, Foliage, Plants, Ground Covers	White grub larvae For example: Japanese beetle larvae, chafers, <i>Phyllophaga</i> spp. Asiatic garden beetle, Oriental beetle	4.67 to 6 lb per 1,000 sq ft
Apply as a broadcast treatment. Prior to application, remove black plastic or other weed barrier material that will not permit water permeability.		
USE RESTRICTIONS - Do not apply this product, by any application method, to linden, basswood, or other Tilia species. - Do not apply more than 267 lb (0.4 lb of active ingredient) per acre per year. - For optimum control, irrigate if rainfall does not occur, or incorporate mechanically, within 24 hours after application to move the active ingredient into the soil. - Avoid runoff or puddling of irrigation water following application. - Avoid application of Merit 0.15 Plus Turf Fertilizer to areas which are water-logged or saturated, which will not allow penetration into the root zone of the plant. - Do not apply to vegetable gardens. Refer to label sections on application equipment and spreader settings.		

APPLICATION EQUIPMENT

Apply Merit 0.15 Plus Turf Fertilizer uniformly over the area being treated with typical granular application equipment. Both drop-type and rotary-type spreaders may be used to apply Merit 0.15 Plus Turf Fertilizer. Do not use spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately.

SPREADER SETTINGS FOR MERIT 0.15 PLUS TURF FERTILIZER

The following chart can be used as a guide in establishing an accurate rate of Merit 0.15 Plus Turf Fertilizer. The suggested settings provide an application rate of 4.6 lb per 1,000 sq ft, or 200 lb per acre. Application rates will vary dependent upon speed, equipment wear and condition of spreader. Carefully calibrate all equipment used prior to use of this product.

[SPREADER SETTING TABLE TO BE INSERTED HERE]

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides above. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact the Bayer Environmental Science Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Bayer Environmental Science Emergency Response Telephone No. is 800-334-7577, or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty bag into application equipment. Dispose of empty bag in a sanitary landfill or by incineration or if allowed by the state and local authorities, by burning. 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, 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, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other 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 Bayer CropScience LP. 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 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.

Net Contents:

PRODUCED FOR



Bayer Environmental Science

A Division of Bayer CropScience LP
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Merit® 0.15 Plus Turf Fertilizer (PENDING) 08/27/2014, 10/20/2014, 10/21/2014, 10/28/2014, 03/02/2015, 03/05/2015

[For placement under Fertilizer Guarantee Section]

[Guaranteed] Fertilizer Analysis [company name]: X-X-X

Fertilizer Guaranteed by [Company Name]

Information regarding the contents and levels of metals in this product are available on the Internet at
<http://www.regulatory-info-ba.com> {or specific company website}

Net Weight: lb (kg)

[Florida License Number; FXXXX]