



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

OCT 6 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Charles W. Boyd
Bayer Advanced
Registrations Manager
95 Chestnut Ridge Road
Montavale, NJ 07645

Subject: Label Amendment:First Aid
Dylox Grub Control (Trichlorfon).
EPA Reg. No. 432-1394 (formerly 3125-507)
Submission dated June 8, 2004

Dear Mr. Boyd:

- 1) Add under the Directions for Use "Do not apply with hand-held or chest-mounted spreader". It is listed under the Precautionary Statements.
- 2) Add under the Directions for Use and the Environmental Hazards "Watering-in is required (is mandatory) for all uses". It is required and not just "for best results" as it appears on the label.
- 3) delete "Nothing works faster on grubs" and "Nothing kills grubs faster" from your claims.

A stamped copy "accepted with comments" of the label is enclosed for your records.

Please submit two (2) copies of the final printed before shipment. If you have any questions please call me at (703) 308-8328.

Sincerely,

A handwritten signature in black ink, which appears to read "Akiva Abramovitch", is written over the typed name.

Akiva Abramovitch, Ph. D.
Chemist
Insecticide-Rodenticide Branch
Registration Division (7505C)

[FRONT PANEL]

2/7

Dylox[®] Grub Control Insecticide

READY-TO-USE

DYLOX is a fast-acting insecticide which kills:

- white grubs,
 - mole crickets,
 - sod webworms, and
 - cutworms.
-

For Use On: Lawns

- Kills Grubs within 24 hours
 - Delivers Overnight Results
 - Nothing Kills Grubs Faster
 - Stops Grubs From Further Damaging Lawn
 - For Use After First Signs of Grubs
 - Degrades Quickly – Does Not Linger
 - Also Controls Sod Webworms, Mole Crickets, Cutworms
 - Contains Dylox
 - Nothing works faster on grubs - overnight results
 - Degrades quickly - will not linger
 - Also kills sod webworms, mole crickets & cutworms
-

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
OCT 6 2004**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
432-1394

ACTIVE INGREDIENT:

Trichlorfon 6.2%



OTHER INGREDIENT:* 93.8%

Net Weight: ____ Pounds

**KEEP OUT OF REACH OF CHILDREN
FOR OUTDOOR RESIDENTIAL USE
CAUTION**

See back panel for ingredients and precautionary statements

READ THE LABEL FIRST!

| | |
|---|---|
| Quick Facts | |
| <ul style="list-style-type: none"> • Easy-To-Use Granules • Kills Grubs within 24 hours • Stops Grubs From Further Damaging Lawn • For Use After First Signs of Grubs • Degrades Quickly & Does Not Linger | |
| KILLS | White Grubs (ART WHITE GRUB) (larvae of chafers and Japanese beetles) Mole Crickets (ART MOLE CRICKET) Sod Webworms and Cutworms |
| COVERAGE | This bag covers 5,000 sq ft (15 lb bag) (white grubs, mole crickets) 7500 sq ft (Sod webworms, cutworms) [15 lb bag] This bag covers 10,000 sq ft (30 lb bag) (white grubs, mole crickets) 15,000 sq ft (Sod webworms, cutworms) [30 lb bag] |
| WHERE TO USE | Lawns |
| WHEN TO USE | When grubs are present |
| HOW MUCH TO USE | See spreader settings |
|   | Questions or comments, call toll-free (877) 229-3725 www.AdvancedLawn.com |

ACTIVE INGREDIENT:

Trichlorfon 6.2%

OTHER INGREDIENT:* 93.8%
 100%

* Other ingredient is Corn cob granules

Trichlorfon is the chemical name for Dylox®

EPA Reg. No. 432-1394

EPA Est. No. XXXX-AA-XX

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION

- Harmful if swallowed
- Do not breathe dust
- Avoid contact with eyes, skin or clothing
- Do not apply with hand-held or chest-mounted spreader
- May cause allergic skin reactions in some people
- Wash thoroughly after handling and before eating or smoking

First Aid + Organophosphate Insecticide

| | |
|---------------------|---|
| If swallowed | <ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If in eyes | <ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice. |
| If inhaled | <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration preferable mouth to mouth, if possible. • Contact poison control center or doctor for further treatment advice. |

NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. You may call (877) 229-3763 for medical emergency information. Active Ingredient: Trichlorfon [CAS # 52-68-6]

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

Environmental Hazards

- This pesticide is toxic to fish, bird and wildlife. Do not apply directly to water.
- Do not contaminate water when cleaning equipment or disposing of equipment wash water.
- Apply this product only as specified on this label.

DIRECTIONS FOR USE

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

For best results, read and follow all label directions.

BEFORE YOU USE

Read and follow these directions when using:

- Do not apply near fish pools, ponds, streams or lakes.
- Do not apply to waterlogged soil.
- Water grass as soon as possible after application to move product to root zone where insects feed.
- Do not allow children or pets on treated lawn until grass has been watered and allowed to dry.




Children and pets may re-enter only after the treated area has been watered and allowed to dry.

Continued on next page

DIRECTIONS FOR USE (continued)**HOW TO USE**

| TO CONTROL | WHEN TO APPLY |
|----------------------------------|---|
| GRUBS | Apply when grubs are present |
| MOLE CRICKETS | Apply when mole crickets are present |
| CUTWORMS SOD WEBWORMS | Mid-May through Mid-June |
| LAWNS | <p>How Much: See Spreader Settings</p> <p>Adjust spreader to the proper setting (see Spreader Settings). (ART)</p> <p>To be sure you cover the entire area uniformly, first treat the border of the lawn then fill in the center. Make parallel passes, walking at a steady pace to ensure even distribution of the granules. (ART)</p> <p>Water thoroughly after applying. (ART)</p> |
| FOR BEST RESULTS | <ul style="list-style-type: none"> • The best time to kill grubs is July through September, when they are young and actively feeding near the soil surface. • Water thoroughly within 24 hours after applying. • Do not mow until the granules are watered into the soil. • Avoid applying DYLOX Grub Control Insecticide to waterlogged areas, as this may decrease the product's effectiveness. • You may spread DYLOX Grub Control Insecticide over soil or mulch. If present, remove weed barrier before applying. |
| SIGNS OF DAMAGE TO LAWNS | |
| GRUBS | White grubs cause extensive damage to lawns by feeding on grass roots. Grass turns yellow, then brown and dies. Grubs chew off roots so that the grass is easily pulled up in pieces with your hands. You can roll it back like a carpet to reveal the grubs. If patches of dead grass appeared in your lawn late last summer, check for grubs. |
| MOLE CRICKETS | Mole crickets often cause extensive damage by tunnelling through lawns. Some species also feed on roots. Tunnelling uproots the grass so it easily dries out. Lawns turn yellow, become thin, weedy and can eventually die. |
| SOD WEBWORMS AND CUTWORMS | Sod webworms and cutworms damage lawn by cutting blades of grass near the ground. Small brown patches will appear. Cutworms can also be seen in the lawn. Webworms nest down in the thatch layer, coming up to feed at night. |
| HOW IT WORKS | DYLOX Grub Control Insecticide is intended to be used when insects and grubs are present. After granules are watered in, insects are killed on contact. The active ingredient then degrades quickly. |

| Spreader Settings | | |
|---|-------------------------------------|-------------------------------------|
| If your spreader is not listed, please call our Consumer Service Hotline toll-free (877) 229-3725 for help. | | |
| Rate for Grubs and Mole Crickets: 3 lbs per 1,000 sq ft | | |
| Rate for Sod Webworms and Cutworms: 2 lbs per 1,000 sq ft | | |
| SPREADER | SETTING* | |
| | To Deliver | To Deliver |
| | 3 lbs per 1,000 sq ft | 2 lbs per 1000 sq ft |
| Vigoro Drop Vigoro Rotary Sta-Green Drop Sta-Green Rotary Bandini Ev-N-Spread Rotary Ortho Drop Ortho Rotary Precision Drop Precision Rotary Quaker Rotary Republic EZ Drop Republic EZ Grow Republic EZ Rotary Scotts Drop Scotts Accugreen Scotts Easygreen Scotts Evengreen Scotts Speedy Green True Temper Rotary ADD: NEW TWO-IN-ONE SPREADERS | Spreader settings to be determined. | Spreader settings to be determined. |
| * Settings are approximate. The condition of your spreader, the speed at which you walk and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer=s directions. Tip: 1000 sq ft = 20 ft x 50 ft Do not use a spreader that applies granules in narrow, concentrated, or uneven bands. Be sure the spreader works properly and spreads granules evenly. | | |

| IMPORTANT: Directions for Storage and Disposal | |
|---|--|
| Do not contaminate water, food, or feed by storage or disposal. | |
| STORAGE CONDITIONS: | Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet. |
| DISPOSAL  | <ul style="list-style-type: none"> • If Empty: Do not reuse this container. Place in trash or offer for recycling if available. • If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain. |
| Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines. | |

| NOTICE |
|---|
| Research and testing has determined that the "Directions for Use" are appropriate for the proper use of DYLOX Grub Control Insecticide under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions. |

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

**Bayer Corporation
Garden & Professional Care
Box 4913
Kansas City, MO 64120-0013
(800) 842-8020**