



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAR 2 0 2007

Norma Pangilinan, Ph.D.
Registration Manager
Bayer Environmental Science
2 T.W. Alexander Drive
Research Triangle Park, N.C. 27709

Re: Revised Patent Statement

EPA Reg No.: 432-1415

Date of Submission: February 7, 2007

Dear Dr. Pangilinan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 7, 2007, for the product Allectus SC Insecticide. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" received but not reviewed and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P)

Office of Pesticide Programs

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I acknowledge that any knowlingily false or misleading statement may be punishable by fine or imprisonment or "

3. Title

5. Date

Manager, Registrations

February 7, 2007

both under applicable law.

2, Signature

4. Typed Name Norma C. Pangilinan (Stamped)

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3. Title

5. Date

Manager, Registrations

February 7, 2007

2. Signeture

4. Typed Name

Norma C. Pangilinan

ALLECTUS SC Insecticide

For general insect control in turfgrass and landscape ornamentals of residential lawns, commercial, industrial, institutional, and recreational areas including athletic field and parks. Not for use on golf courses or sod farms,

ACTIVE INGREDIENT:	
Imidacloprid*, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	5.0%
Bifenthrin**	4.0%
OTHER INGREDIENTS:	<u>91. 0%</u>
	100.0%

EPA Reg. No. 432-1415

EPA Est. No.

Bifenthrin: U.S. Patent No. 4,238,505

Contains 0.45 pounds of imidacloprid and 0.36 pounds of bifenthr n per gallon.

STOP - READ THE LABEL BEFORE USE. KEEP OUT OF REACH OF CHILDREN. CAUTION

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.		
	y call toll free the Bayer Environmental Science Emergency Response Telephone No. 1-800-334-7577. Have a label with you when calling a poison control center or doctor, or going for treatment.		
Note To Physician:	No specific antidote is available. Treat the patient symptomatically		

This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and 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 washwater or rinsate. Runoff may be hazardous to aquatic organisms in water adjacent to treated areas

This product contains a chemical with 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.

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

Do not formulate this product into other end-use products.

Do not allow children or pets on treated surfaces until the spray has dried.

This product may be covered by the following patent: U.S. Patent Nos. 5,783,203.

^{**}Cis isomers 97% minimum, trans isomers 3% maximum.

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 container is leaking, invert to prevent leakage. If container is leaking or 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 below. Absorb spilled material with absorbing type compounds 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 1-800-334-7577 or contact Chemtrec at 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 Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL INFORMATION

APPLICATION TO TURFGRASS

ALLECTUS SC can be used for the control of soil inhabiting pests of turfgrass, such as northern and southern masked chafers, Cyclocephala borealis, C. immaculata, and/or C. lurida; Asiatic garden beetle, Maladera castanea; black vine weevil, Otiorhyncus sulcatus, European chafer, Rhizotrogus majalis; green June beetle, Cotinis nitida; May or June beetles, Phyllophaga spp.; Japanese beetle, Popillia japonica; oriental beetle, Anomala orientalis; Euetheola humulis rugiceps; billbugs, Sphenophorus spp.; annual bluegrass weevil, Listronotus maculicollis, black turfgrass ataenius, Ataenius spretulus; Aphodius spp; crane flies, Tipula spp.; frit fly, Oscinella frit; chinch bugs, Blissus spp.; fire ants, Solenopsis spp.; cutworms, Agrotis ipsilon, Peridroma saucia, Nephalodes menians; armyworms, Spodoptera spp., Pseudaletia spp.; sod webworm, Crambus spp.; and mole crickets, Scapteriscus spp. ALLECTUS SC can be used as directed on turfgrass in sites such as home lawns, business and office complexes, shopping complexes, multi-family residential complexes, airports, cemeteries, parks, playgrounds, and athletic fields.

The active ingredients in ALLECTUS SC have sufficient residual activity so that applications for control of subsurface feeders can be made preceding the egg laying activity. The need for an application for control of subsurface feeders can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Optimum control of subsurface feeders 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.

The active ingredients in ALLECTUS SC have sufficient knockdown and residual activity to provide curative and residual control of surface feeding pests. Applications for control of surface feeding pests can be made when infestations are anticipated based on historical monitoring of the site, previous records or experience, current season adult trapping or presence of insects at economic thresholds as determined by scouting and/or recommendations of local State extension personnel or other qualified specialists.

Applications should not be made when turfgrass areas are waterlogged or the soil is saturated with water. 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 in the soil profile. Total amount applied cannot exceed 9.0 pints (0.5 lb of imidacloprid, 0.4 lb of bifenthrin) per acre per year.

ALLECTUS SC mixes readily with water and other aqueous carriers, and controls a wide spectrum of insects and mites on turfgrass, trees, shrubs, foliage plants, non-bearing fruit and nut trees, and flowers in outdoor plantscapes, such as around residential dwellings, parks, institutional buildings, recreational areas, athletic fields and home lawns. Nonbearing crops are perennial crops that will not produce a harvestable raw agricultural commodity during the season of application.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research. For use on plants intended only for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, or lawns and grounds.

APPLICATION EQUIPMENT FOR USE ON TURFGRASS

Apply ALLECTUS SC in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turigrass insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly.

APPLICATION TO ORNAMENTALS

ALLECTUS SC is for use on ornamentals in commercial and residential landscapes. ALLECTUS SC is a systemic product and will be translocated upward into the plant system from root uptake. To assure optimum effectiveness, the product must be placed where the growing portion of the target plant can absorb the active ingredient. The addition of a nitrogen containing fertilizer, where applicable, into the solution may enhance the uptake of the active ingredient. Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

When making soil applications to plants with woody stems, systemic activity will be delayed until the active ingredient is translocated throughout the plant. In some cases, this translocation delay could take 60 days or longer. Applications should be made prior to anticipated pest infestation to achieve optimum levels of control. For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.

Ant Management Programs

Use ALLECTUS SC to control aphids, scale insects, mealybugs and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations.

NOTE: Not for use in commercial greenhouses, nurseries, or on grasses grown for seed, golf courses, sod farms or on commercial fruit and nut trees.

APPLICATION EQUIPMENT FOR FOLIAR APPLICATIONS

(Be sure to read "APPLICATION EQUIPMENT" Section of this label)

Banks grass mites

Billbugs

Crickets

Cutworm

Earwigs Fleas

Chinch bugs

Centipedes

ALLECTUS SC mixes readily with water and may be used in many types of application equipment. Mix product with the required amount of water and apply as desired dependent upon the selected use pattern. When making foliar applications on hard to wet foliage such as holly. pine, or ivy, the addition of a spreader/ sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application. ALLECTUS SC has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Do not apply through any irrigation system.

RECOMMENDED APPLICATIONS

Resistance: Some insects are known to develop resistance to products used repeatedly for control. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. Consult your local or state pest management authorities for details. If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and suspect that resistance is a reasonable cause, immediately consult your local company representative or pest management advisor for the best alternative method of control for your area.

CROP	PEST		DOSAGE ALLECTUS SC
Turf grasses	Aphodius spp.	Japanese beetle	3.6 to 4.5 pint per acre
	Asiatic garden beetle	Mole crickets	(1.32 to 1.65 fl. oz. per 1000 sq ft)
	Black turfgrass ataenius	Northern masked chafer	
	Black vine weevil	Nuisance ants	
	European chafer	Oriental beetle	
	European crane fly	Phyllophaga spp.	
	Frit fly	Southern masked chafer	
	Green June beetle	Ticks	
	Imported fire ants		
	Annual bluegrass weevil	Grasshoppers	1.1 to 4.5 pint per acre
	Armyworms	Leafhoppers	(0.4 to 1.65 fl. oz. per 1000 sa ft)

Leafhoppers

Mealybugs

Millipedes

Mites

Pillbugs

Sowbugs

Sod webworms

Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application.

NOTE: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. For optimum control, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch. Do not apply more than 9 pints product per acre (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year. Do not apply more than 4.5 pints product per acre (0.25 lb imidacloprid, 0.2 lb bifenthrin) per application. Avoid mowing turf or lawn area until after irrigation or rainfall has occurred so that uniformity of application will not be affected.

In New York State, this product may NOT be applied to any grass or turf area within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch). In New York State, do make a single repeat application of ALLECTUS SC if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Comments

Armyworms, Cutworms and Sod Webworms: To ensure optimum control, delay watering (irrigation) or mowing for 24 hours after application. If the grass area is being maintained at a mowing height of greater than 1 inch, then higher application rates (Up to 1.65 fluid oz. per 1000 square feet) may be required during periods of high pest pressure.

(0.4 to 1.65 fl. oz. per 1000 sq ft)

Annual Bluegrass Weevil (Listronotus maculicollis) adults: Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when Forsythia is in full bloom and concludes when flowering dogwood (Cornus florida) is in full bloom. Consult your State Cooperative Extension Service for more specific information regarding application timing.

Annual Bluegrass Weevil (Listronotus maculicollis) larvae: For best results, applications should be made at the first sign of wilting of bluegrass. For the first generation, this wilting often occurs after full bloom of flowering dogwood (Cornus florida).

Billbug adults: Applications should be made when adult billbugs are first observed during April and May. Degree day models have been developed to optimize application timing. Consult your State Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of over-wintered chinch bugs.

Chinch Bugs: Chinch Bugs infest the base of grass plants and are often found in the thatch layer. Irrigation of the grass area before treatment will optimize the penetration of the insecticide to the area where the chinch bugs are located. Use higher volume applications if the thatch layer is excessive or if a relatively long mowing height is being maintained. Chinch Bugs can be one of the most difficult pests to control in grasses and the higher application rates (Up to 1.65 fluid oz. per 1000 square feet) may be required to control populations that contain both nymphs and adults during the middle of the summer.

Mites: To ensure optimal control of eriophyid mites, apply in combination with the labeled application rate of a surfactant. A second application, five to seven days after the first, may be necessary to achieve acceptable control.

Flea larvae: Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Use a higher volume application when treating these areas to ensure penetration of the insecticide into the soil.

Imported Fire Ants: Control will be optimized by combining broadcast applications that will control foraging workers and newly mated fly-in queens with mound drenches that will eliminate existing colonies. If the soil is not moist, then it is important to irrigate before application or use a high volume application. Irrigation after application also will improve control. Mounds should be treated by diluting 1/3 fluid oz. (2 teaspoons) of ALLECTUS SC per gallon of water and applying 1 to 2 gallons. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65 - 80°F) or in early morning or late evening hours.

Mole Cricket adults: Achieving acceptable control of adult mole crickets is difficult because grass areas are subject to continuous invasion during the early spring by this large active stage. Applications should be watered in with up to 0.5 inches of water immediately after treatment. Grass areas that receive pressure from adult mole crickets should be treated within one month of peak egg hatch to ensure optimum control of subsequent nymph populations (see below).

Mole Cricket nymphs: Grass areas that received adult mole cricket pressure in the spring should be treated within one month of peak egg hatch. Optimal control is achieved at this time because young nymphs are more susceptible to insecticides. Control of larger, more damaging, nymphs later in the year will require higher application rates to maintain acceptable control. Applications should be watered in with up to 0.5 inches of water after treatment.

Ticks (Including ticks that may transmit Lyme Disease and Rocky Mountain Spotted fever): Do not make spot applications. Treat the entire area where exposure to ticks may occur. Use higher spray volumes when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreatment may be necessary to achieve and/or maintain control during periods of high pest pressure. Repeat application is necessary only if there are signs of renewed activity. Repeat application should be limited to no more than once per seven days. Deer ticks (Ixodes sp.) have a complicated life cycle that ranges over a two year period and involves four life stages. Applications should be made in the late fall and/or early spring to control adult ticks that are usually located on brush or grass above the soil surface and in mid to late spring to control larvae and nymphs that reside in the soil and leaf litter. American dog ticks may be a considerable nuisance in suburban settings, particularly where homes are built on land that was previously field or forest. These ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control American dog tick larvae, nymphs and adults.

Use of an alternate class of chemistry in a treatment program is recommended to prevent or delay pest resistance.

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure ALLECTUS SC.

RECOMMENDED Foliar Application					
	— nd industrial and commercial building and	residential areas.			
			DOSAGE		
CROP	PEST ALLECTUS 0.81 SC				
Frees	Foliar Application: Start treatments	s prior to establishment of high pest popular	tions and reapply as needed.		
hrubs					
vergreens	}				
lowers oliage plants					
onage plants Froundcovers					
nterior					
Plantscapes					
Tantocaped	Ants	Mites	21.3 fl. oz (630 mL)		
	Beet Armyworm	Mosquitoes	per 100 gal of water		
	Black vine weevil adult Broad mites	Orchid weevil	per 100 gai of water		
	Budworms	Pine needle scales (crawlers)			
	Scale crawlers	Plant bugs			
	Citrus thrips Clover mites	San Jose scale (crawlers)	,		
	Diaprepes (adults)	Sp der mites			
	European red mites	Thrips			
	Fleabeetles Fungus gnats (adults)	Tip moths	Ĭ		
	Grasshoppers	Tw-g borers			
	Leafrollers	Wasps			
	Bagworms	Gypsy moth caterpillars	10.7 to 21.3 fl. oz (315 to 630 mL)		
	Cutworms	Leaf feeding caterpillars Tent caterpillars	per 100 gal of water		
	Fall webworms Adelgids	Leafhoppers (including glassy-	6.7 to 21.3 fl. oz (200 to 630 mL)		
	Aphids	winged sharpshooter)	per 100 gal of water		
	Japanese beetles Lace bugs	Mealybugs Psyllids	por roo gar or valor		
	Leaf beetles (including	Sawfly larvae	İ		
	elm and viburnum leaf beetles)	Thrips (suppression)			
		Treehoppers Whiteflies			
	Foliar Applications: Apply the specified application rate as a full coverage foliar spray. Repeat treatment as necessary to achieve control using higher application rates as pest pressure & foliage area increases. Repeat application should be limited in no more than once per seven days. Certain cultivars may be sensitive to the final spray solution. A small number of plants should be treated and observed for one week prior to application to the entire planting.				
	Broadcast Applications: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1000 sq ft. For optimum control, irrigate thoroughly to incorporate ALLECT SC Insecticide into the upper soil profile. Refer to use directions specific for FLOWERS and GROUND COVERS concerning additional use directions.				
					
	White grub larvae (such as Japanese	Imported Fire Ants Nuisance ants	1.32 to 1.65 fl. oz.		
	beetle larvae,		(40 to 50 mL)		
	Chafers, Phyllophaga spp. Asiatic garden beetle, Oriental beetle)		per 1000 sq. ft.		
	Centipedes	Pillbugs	0.4 to 0.85 fl. oz.		
	Crickets	Sowbugs	(12 to 26 mL)		
	Earwigs	Armyworms Cutworms	per 1000 sq ft		
	1	Sod webworms	(

RECOMMENDED APPLICATIONS

Applications to Soil

TREES, SHRUBS, FLOWERS AND GROUNDCOVER

For use only around industrial and commercial building and residential areas.

Adelaids Aphids Armored scales (suppression) Black vine weevil larvae Eucalvotus longhorned borer Flatheaded borers (including bronze birch and alder borer) Japanese beetles

Lace bugs Leaf beetles (including elm and viburnum leaf

beetles)

Leafhoppers (including glassywinged

sharpshooter) Leafminers Mealybugs Pine tip moth larvae

Psyllids Royal palm bugs

Sawfly larvae Soft scales Thrips (suppression)

White grub larvae

Whiteflies

Trees

0.45 to 0.9 fl. oz. (14 to 27 mL) per inch of trunk diameter (D.B.H.)

Soil Injection: GRID SYSTEM: Holes should be spaced on 2.5 foot centers, in a grid pattern, extending to the drip line of the tree. CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line. BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.

Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree.

No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.

Soil Drench: Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

For Control of Specified Borers: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.

Shrubs

0.45 to 0.9 fl. oz. (14 to 27 mL) per foot of shrub height

Soil Injection: Apply to individual plants using dosage indicated. Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. Keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per shrub.

No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.

Soil Drench: Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

Flowers and Groundcovers

1.32 to 1.65 fl. oz. (40 to 50 mL)

per 1000 sq. ft.

Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is irrigated thoroughly after application.

RESTRICTIONS

Avoid runoff or puddling of irrigation water following application. Avoid application of ALLECTUS SC to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant. Broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.

Treated areas may be replanted with any crop specified on an imidacloprid and bifenthrin label, or with any crop for which a tolerance exists for the two active ingredients.

For crops not listed on any imidacloprid and a bifenthrin label, or for crops for which no tolerances for the active ingredients have been established, a 12-month plant-back interval should be observed.

Do not apply by air.

Do not apply by any type of irrigation system.

Not for use in nurseries or commercial greenhouses.

10/

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.

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Produced for



Bayer Environmental Science

A Business Group of Bayer CropScience LP 2 T.W. Alexander Drive Research Triangle Park, NC 27709

Allectus SC Insecticide (MASTER) Approved 07/06/06, Notification 02/06/07

Document Processing Desk (NOTIF) EPA - Office of Pesticide Programs (7504P) One Potomac Yard, Room S-4900 2777 S. Crystal Drive Arlington, VA 22202

Attn: Ms. Linda Arrington

Subject: Label Notification - Revise Patent Statement

- Allectus GC SC Insecticide; EPA Reg. No. 432-1421 - Allectus SC Insecticide; EPA Reg. No. 432-1415

Dear Ms. Arrington:

This notification is being submitted pursuant to PR Notice 98-10. The changes to the label of the above listed products involves revision of Patent Statement

The following documents are enclosed in support of this notification:

- 1. Completed EPA Form 8570-1
- 2. Five copies of the revised product label plus one highlighted copy tracking revision to label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec.1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Section 12 and 14 of FIFRA.

February 7, 2007

Bayer Environmental Science SA 2 T.W. Alexander Drivo Research Triangle Park, NC 27709

Phone: 919 549 2000

NOTIFICATION



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Please do not hesitate to call (919-549-2428), fax (919-549-3937) or e-mail me (norma.pangilinan@bayercropscience.com), if you have any questions.

Thank you very much for your assistance in this mater.

Sincerely,

BAYER ENVIRONMENTAL SCIENCE A Business Group of Bayer CropScience

NORMA C. PANGILINAN, Ph.D.

Registrations Manager