

432-1418

09-21-2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 21, 2010

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

Subject: Amendment – Revised Environmental Hazards, Directions for Use, Resistance Management, and Fertilizer marketing claim.
Allectus 0.18 G Plus Turf Fertilizer Insecticide
EPA Reg. No. 432-1418
Your submission dated May 28, 2010

Dear Ms. Pangilinan:

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 listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Replace "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet" in the Precautionary Statements section.
2. Delete "Recommendations" from the title "Resistance Management Recommendations"

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,
BeWanda Alexander for
Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

with COMMENTS
In EPA Letter Dated
SEP 21 2010

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

432-1418

GROUP

3

4A

INSECTICIDE

ALLECTUS® 0.18 G PLUS TURF FERTILIZER Insecticide

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

For control of grubs, treats up to _____ sq. ft.

For control of surface feeders, treats up to _____ sq. ft.

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 0.1%

Bifenthrin* 0.08%

OTHER INGREDIENTS: 99.82%

100.00%

EPA Reg. No. 432-1418

EPA Est. No. _____

*Cis isomers 97% minimum, trans isomers 3% maximum.

Net Content/Net Weight 50 Lbs. (22.68 Kg.) [For control of grubs, treats up to 10,890 sq ft.

For control of surface feeders, treats up to 21,780 sq ft]

Net Content/Net Weight 20 Lbs. (9.07 Kg.) [For control of grubs, treats up to 4,356 sq. ft.

For control of surface feeders, treats up to 8,712 sq. ft.]

Fertilizer Marketing Claim:

Contains **LESCO® Poly Plus® Sulfur Coated Urea** to provide uniform growth with extended nitrogen feeding.

[For placement in Fertilizer Guarantee Box

"FLORIDA APPLICATIONS: For use on athletic turf in FL, we recommend you follow SL191, "Recommendations for N, P, K & Mg for Golf Course and Athletic Field Fertilization Based on Mehlich I Extractant", available on the internet at <http://edis.ifas.ufl.edu/SS404> or "Best Management Practices for the Enhancement of Environmental Quality on Florida Golf Courses" at <http://www.flaes.org/pdf/glfbmp07.pdf>."

FLORIDA APPLICATIONS: For commercial application to urban turf or lawns in FL, we recommend you follow the Best Management Practices for Protection of Water Resources in Florida, June 2002, Florida Green Industries, available on the internet at http://www.flaes.org/pdf/BMP_Book_final.pdf.]

**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 on skin

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 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 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.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency call toll free the Bayer Environmental Science Emergency Response Telephone No. 1-800-334-7577.

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 absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

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.

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 1-800-334-7577 or contact Chemtec 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 Disposal: 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, by incineration, or if allowed by the state and local authorities, by burning. If burned, stay out of smoke.

APPLICATION TO TURFGRASS

The use of this product will provide plant nutrients as well as providing control of selected insect pests. ALLECTUS® 0.18 G Plus Turf Fertilizer can be used for the control of soil inhabiting pests of turfgrass; for example 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*; *Euethola 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 0.18 Plus Turf Fertilizer can be used as directed on turfgrass; for example, in home lawns, business and office complexes, shopping complexes, multi-family residential complexes, airports, cemeteries, parks, playgrounds, and athletic fields.

The active ingredients ALLECTUS 0.18 G Plus Turf Fertilizer 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 0.18 G Plus Turf Fertilizer have sufficient knockdown and residual activity to provide remedial 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.

Do not apply more than 250 lb of ALLECTUS 0.18 G Plus Turf Fertilizer (0.25 lb of imidacloprid, 0.2 lb bifenthrin) per acre per application on residential use sites (i.e., around private homes, apartment buildings, condominiums, non-agricultural outbuildings, non-commercial greenhouses, pre-schools or day care facilities). May be applied at up to 500 lb of ALLECTUS 0.18 G Plus Turf Fertilizer (0.5 lb of imidacloprid, 0.4 lb bifenthrin) per application on non-residential use sites (i.e., around institutional, public, commercial or industrial buildings; parks; recreational areas or athletic fields).

Do not apply 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 a total of 500 lb (0.5 lb of imidacloprid, 0.4 lb of bifenthrin) per acre per year.

NOTE: Not for use in commercial greenhouses or on grass grown for seed or on golf courses and sod farms. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, or on lawns and grounds.

APPLICATION EQUIPMENT

Apply ALLECTUS 0.18 G Plus Turf Fertilizer uniformly over the area being treated with normally used granular application equipment. Both drop-type and rotary-type spreaders may be used to apply ALLECTUS 0.18 G Plus Turf Fertilizer. Avoid the use of spreaders that 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.

Resistance Management Recommendations

Some insects are known to develop resistance to insecticides after repeated use. As with any insecticide, the use of this product should conform to resistance management strategies established for the use area. ALLECTUS 0.18 G Plus Turf Fertilizer contains Group 3 and 4A insecticides. Insect biotypes with acquired or inherent resistance to Group 3 and 4A insecticides may eventually dominate the insect population if Group 3 and 4A insecticides are used repeatedly as the predominant method of control for targeted species.

APPLICATION DOSAGE INFORMATION

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

CROP	PEST	DOSAGE ALLECTUS 0.18 G Plus Turf Fertilizer
Turfgrasses	Larvae of subsurface feeders: Green June beetle Asiatic garden beetle Japanese beetle Black turfgrass atenioides Northern masked chafer Black vine weevil Oriental beetle European chafer <i>Phyllophaga</i> spp. European crane fly Southern masked chafer	200 to 250 lb per acre (4.6 to 5.7 lb per 1000 sq ft)
	Adults and/or larvae of subsurface and surface feeding pests: Centipedes Fleas Millipedes Ticks Imported fire ants Mole crickets Pillbugs Sowbugs	150 to 250 lb per acre (3.4 to 5.7 lb per 1000 sq ft) or for heavy infestations, a single annual application of 400 to 500 lb per acre (9.2 to 11.4 lb per 1000 sq ft) to non-residential turf
	Adults and/or larvae of surface feeders: Annual bluegrass weevil Leafhoppers Billbugs Mealybugs Chinch bugs Nuisance ants	150 to 250 lb per acre (3.4 to 5.7 lb per 1000 sq ft)
	Larvae of surface feeders: Armyworm Cutworm Sod webworms	100 to 250 lb per acre (2.3 to 5.7 lb per 1000 sq ft)

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

NOTE: For optimum control, irrigate if rainfall does not occur within 24 hours after application to move the active ingredient through the thatch. Do not apply more than 500 lb product (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year. Do not apply more than 250 lb product (0.25 lb imidacloprid, 0.2 lb bifenthrin) per acre per application to residential turf. 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 0.18 G Plus Turf Fertilizer if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Annual Bluegrass Weevil (*Listronotus maculicollis*) adults: Time applications 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, apply at the first sign of wilting of bluegrass. For the first generation, this wilting often occurs after full bloom of flowering dogwood (*Cornus florida*).

Armyworms, Cutworms and Sod Webworms: If the grass area is being maintained at a mowing height of greater than 1 inch, then higher application rates (up to 5.7 lb per 1000 sq ft) may be required during periods of high pest pressure.

Billbug adults: For best results, apply 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. Chinch bugs can be one of the most difficult pests to control in grasses and the higher application rates (Up to 5.7 lb per 1000 sq ft) may be required to control populations that contain both nymphs and adults during the middle of the summer.

Imported Fire Ants: Apply as a broadcast treatment in non-residential turf areas up to 11.4 lb per 1000 sq ft. For mound treatment, apply 1 cup of ALLECTUS 0.18 G Plus Turf Fertilizer per mound and then drench the mound with 1 to 2 gallons of water. Treat mounds with sufficient force to break their apex and allow the insecticide to flow into the ant tunnels.

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. For application when both adults and/or large nymphs are present and actively tunneling, irrigate prior to application if soil is dry and apply 5.7 lbs per 1000 sq ft. For best results, water-in applications with up to 0.5 inches of water immediately after treatment. Treat grass areas that receive pressure from adult mole crickets within one month of peak egg hatch to ensure optimum control of subsequent nymph populations (see below). For heavily infested mole cricket areas, or in areas with a history of mole cricket infestation, use a single seasonal application rate of 400 to 500 lb per acre (9.2-11.4 lb per 1000 sq ft) to non-residential turf.

Mole Cricket nymphs: For best results, treat grass areas that received adult mole cricket pressure in the spring 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. For maximum effectiveness, irrigate prior to application if soil is dry, apply as a broadcast treatment at 5.7 lb per 1000 sq ft. For best results, water-in applications with up to 0.5 inches of water after treatment. For heavily infested mole cricket areas, or in areas with a history of mole cricket infestation, use a single seasonal application rate of 400 to 500 lb per acre (9.2-11.4 lb per 1000 sq ft) to non-residential turf.

Pillbugs and sowbugs: For heavy infestations apply 500 lbs per acre (11.4 lbs per 1000 sq ft) of ALLECTUS 0.18 G Plus Turf Fertilizer to non-residential turf.

Ticks (Including ticks that may transmit Lyme disease and Rocky Mountain spotted fever): Treat the entire area where exposure to ticks may occur. 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. Limit repeat application to no more than once per seven days. Deer ticks (*Ixodes* spp.) have a complicated life cycle that ranges over a two year period and involves four life stages. Make applications 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 (*Dermacentor variabilis*) 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. Make applications as necessary from mid-spring to early fall to control American dog tick larvae, nymphs and adults.

Spreader settings for ALLECTUS 0.18 G Plus Turf Fertilizer

The following chart can be used as a guide in establishing an accurate rate of ALLECTUS 0.18 G Plus Turf Fertilizer. Application rates will vary depending upon speed, equipment wear and condition of spreader. Carefully calibrate application equipment prior to commercial use of this product.

SPREADER	SPEED (mph)	SETTINGS	
		100 lb/A	250 lb/A
Cyclone Way	3		
Earthway 2400 (no information available)			
Gandy Turf Tender 24" (no information available)	3		
Gandy Turf Tender 42" (no information available)	3		
Lely	4.5		
Lesco Broadcast	3		
PSB Prizelawn CBR-III	3		
Scott's Proturf R-8A	3		
Scott's Proturf SR-2000	3		
Scott's Handy Green (obsolete)	3		
Scott's Accupro	3		
Spyker	3		
Vicon Model 402	4.5		

RESTRICTIONS

- Avoid runoff or puddling of irrigation water following application. Avoid application of ALLECTUS 0.18 G Plus Turf Fertilizer to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant. Do not apply more than 500 lb (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 a 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 must be observed.
- Do not apply by air.
- Not for use in nurseries or commercial greenhouses.
- Apply this product directly to the lawn or garden area. Water treated area as directed on this label.
- Do not water to the point of run-off. Do not make applications during rain.
- Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

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 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.

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PRODUCED FOR



Bayer Environmental Science

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Allectus 0.18 G Plus Turf Fertilizer (MASTER) Approved 02/25/09, Notification 05/17/10