

432-1419

03/31/2005

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

MAR 31 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Richard M. Gorrell
Bayer Environmental Science
95 Chestnut Ridge Road
Montvale, NJ 07645

Subject: Corrected Labels
Allectus GS Granular EPA Reg. No. 432-1461
Allectus 0.15 G Plus Turf
Fertilizer Insecticide EPA Reg. No. 432-1419
Your Submission date, March 23, 2005

Dear Mr. Gorrell:

Thank you for your prompt response in correcting the above labels. The labels are now a part your company's records.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable. A stamped copy is enclosed for your records. Submit two (2) copies of your final printed labeling before you release the product for shipment. If there are questions call me at 703 305-5409.

Sincerely,

A handwritten signature in black ink, appearing to read "Dani Daniel".

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505C

Enclosure:

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ALLECTUS 0.15 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.

ACTIVE INGREDIENT:

Imidacloprid*, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 0.083%
Bifenthrin** 0.067%

OTHER INGREDIENTS: 99.850%
100.000%

EPA Reg. No. 432-xxxx

EPA Est. No. _____

* Protected by U.S. Patent No. 4,742,060 & 5,783,203

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

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

**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 | <ul style="list-style-type: none"> • 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 | <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. |

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. 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. Run-off 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.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

MAR 31 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 432-1419

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 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: 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.

GENERAL INFORMATION

APPLICATION TO TURFGRASS

The use of this product will provide plant nutrients as well as providing control of selected insect pests. ALLECTUS 0.15 G 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, *Ottiorhynchus sulcatus*; European chafer, *Rhizotrogus majalis*; green June beetle, *Cotinis nitida*; May or June beetles, *Phyllophaga* spp.; Japanese beetle, *Popillia japonica*; oriental beetle, *Anomala orientalis*; sugarcane grub, *Euethola humulis rugiceps*; billbugs, *Spherophorus* spp.; annual bluegrass weevil, *Hyperodes* spp.; black turfgrass ataenius, *Ataenius spretulus*; *Aphodius* spp; European crane fly, *Tipula paludosa*; 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 0.15 G 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 ALLECTUS 0.15 G 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 0.15 G 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.

Do not apply more than 300 lb. of ALLECTUS 0.15 G (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 600 lb. of ALLECTUS 0.15 G (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).

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 a total of 600 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.

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APPLICATION EQUIPMENT

Apply ALLECTUS 0.15 G 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 0.15 G. 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.

RECOMMENDED APPLICATIONS

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

| CROP | PEST | DOSAGE ALLECTUS 0.15 G |
|-------------|--|--|
| Turfgrasses | Larvae of subsurface feeders: Green June beetle Asiatic garden beetle Japanese beetle Black turfgrass ataeenius Northern masked chafer Black vine weevil Oriental beetle European chafer <i>Phyllophaga</i> spp. European crane fly Southern masked chafer Sugarcane grub | 240 to 300 lb per acre (5.5 to 6.9 lb per 1000 ft sq) |
| | Adults and/or larvae of subsurface and surface feeding pests: Centipedes Fleas Millipedes Ticks Imported fire ants Mole crickets Pillbugs Sowbugs | 192 to 300 lb per acre (4.4 to 6.9 lb per 1000 ft sq) or for heavy infestations, a single annual application of 400 to 500 lb per acre (11.1 to 13.8 lb per 1000 sq ft) |
| | Adults and/or larvae of surface feeders: Annual bluegrass weevil Billbugs Chinch bugs Frit fly Leafhoppers Mealybugs Nuisance ants | 192 to 300 lb per acre (4.4 to 6.9 lb per 1000 ft sq) |
| | Larvae of surface feeders: Armyworm Cutworm Sod webworms | 120 to 300 lb per acre (2.75 to 6.9 lb per 1000 ft sq) |

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

NOTE: 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 600 lb product per acre (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year. Do not apply more than 300 lb product per acre (0.25 lb imidacloprid, 0.2 lb bifenthrin) per application except for mole cricket control. 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 0.15 G if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Imported Fire ants: ALLECTUS 0.15 G may be applied as a broadcast treatment at 6.9 lb. per 1000 sq. ft.

Mole crickets: For maximum effectiveness, apply ALLECTUS 0.15 G as a broadcast treatment at 6.9 lb. per 1000 sq. ft. prior to or during the peak egg hatch period. For application when both adults and/or large nymphs are present and actively tunneling, irrigate prior to application if soil is dry and apply 6.9 lb. per 1000 sq. ft. Rainfall or additional irrigation within 24 hours after application will improve effectiveness of ALLECTUS 0.15 G. For heavily infested mole cricket areas, use a single seasonal application rate of 480 to 600 lb per acre.

Spreader settings for ALLECTUS 0.15 G

The following chart can be used as a guide in establishing an accurate rate of ALLECTUS 0.15 G. 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 | |
|--|----------------|----------|----------|
| | | 120 lb/A | 300 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 0.15 G to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant. Do not apply more than 600 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 should be observed.

Do not apply by air.

Not for use in nurseries or commercial greenhouses.

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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 should be followed carefully. However, because of manner of use and other factors beyond Bayer Environmental Science's control it is impossible for Bayer Environmental Science 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.

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Bayer Environmental Science
A Business Group of Bayer CropScience LP
95 Chestnut Ridge Road
Montvale, NJ 07645

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