



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

FEB 21 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject: Amended Label Application for Use of Golf Courses
Allectus 0.18 GC Plus Turf Fertilizer Insecticide EPA Reg. No. 432-1426
Allectus 0.225 GC Plus Turf Fertilizer Insecticide EPA Reg. No. 432-1427
Allectus 0.15 GC Plus Turf Fertilizer Insecticide EPA Reg. No. 432-1428
Your Submission date. July 25, 2006

Dear Ms. Pangilinan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable provided the make the following changes:

1. On page 2 under "Agricultural Use Requirements" add the Agency's glove state: Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

2. Also add the glove statement to the "Personal Protective Equipment (PPE)) list on page two.

3. Make the following changes to the "Warranty Statement":

- Under "Conditions" change the word "should" to the word "must" in the first line.

-Under "Disclaimer of Warranties" at the beginning of the sentence add "To the extent consistent with applicable law"...



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

-Under "Limitations of Liability" at the beginning of the sentence add "To the extent consistent with applicable law"...

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,



Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Enclosure:

RESTRICTED USE PESTICIDE

Due To Toxicity To Fish and Aquatic Organisms

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

[ALTERNATE TEXT]

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators, or persons under their direct supervision, and only for those uses covered by the certified applicator's certification.

ALLECTUS 0.18[®] GC PLUS TURF FERTILIZER Insecticide

For fertilization and general insect control in turfgrass areas of golf courses and 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. 432-1426

EPA Est. No. ____

* This product is covered by U.S. Patent Nos. 5,783,203. Other patents pending

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

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

DO NOT USE THIS PRODUCT ON GOLF COURSES AND SOD FARMS IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK.

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.]

ACCEPTED
with COMMENTS
In EPA Letter Dated:
FEB 21 2007
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
 432-1426

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.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long sleeve shirt and pants
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendation:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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.

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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is

- Coveralls
- Waterproof gloves
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENT

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

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® 0.18 GC Plus Turf Fertilizer 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, *Otiorhynchus 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 GC Plus Turf Fertilizer can be used as directed on turfgrass on golf courses and sod farms.

The active ingredients ALLECTUS 0.18 GC 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 GC Plus Turf Fertilizer 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 a total of 500 lb (0.5 lb of imidacloprid, 0.4 lb of bifenthrin) per acre per year.

APPLICATION EQUIPMENT

Apply ALLECTUS 0.18 GC 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 GC 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.

RECOMMENDED APPLICATIONS

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

CROP	PEST	DOSAGE ALLECTUS 0.18 GC Plus Turf Fertilizer
Turfgrasses	Larvae of subsurface feeders: Green June beetle Asiatic garden beetle Black turfgrass ataenius Black vine weevil European chafer European crane fly Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. 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)
	Adults and/or larvae of surface feeders: Annual bluegrass weevil Billbugs Chinch bugs Frit fly Leafhoppers Mealybugs 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, irrigation or rainfall should occur within 24 hours after application to move the active ingredient through the thatch. Do not apply more than 500 lb product per acre (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year. 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 GC 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: 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*).

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: 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. 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 up to 11.4 lb per 1000 sq ft. For mound treatment, apply 1 cup of ALLECTUS 0.18 GC Plus Turf Fertilizer per mound and then drench the mound with 1 to 2 gallons of water. The mounds should be treated 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. 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). 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.).

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. For maximum effectiveness, irrigate prior to application if soil is dry, apply as a broadcast treatment at 5.7 lb per 1000 sq ft. Applications should be watered in 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.).

Pillbugs and sowbugs: For heavy infestations apply 500 lbs per acre (11.4 lbs per 1000 sq ft) of ALLECTUS 0.18 GC Plus Turf Fertilizer.

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. Repeat application should be limited 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. 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 (*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. Applications should be made as necessary from mid-spring to early fall to control American dog tick larvae, nymphs and adults.

Spreader settings for ALLECTUS 0.18 GC Plus Turf Fertilizer			
The following chart can be used as a guide in establishing an accurate rate of ALLECTUS 0.18 GC 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 GC 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 should be observed.
- Do not apply within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes, or natural ponds, estuaries, and commercial fish farms ponds.
- Do not apply by air.
- Not for use in nurseries or commercial greenhouses.

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 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: 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 LP is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. 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 ALLOWED BY 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.

This product and its use may be protected by one or more patents, including U.S. Patent No. 5,783,203. With the purchase and use of this product from Bayer CropScience LP or one of Bayer CropScience LP's authorized distributors or retailers, the purchaser accepts and is bound by a license under the specifically listed U.S. Patents to use the purchased quantity of ALLECTUS 0.18 GC Plus Turf Fertilizer only in accordance with the label instructions provided on this label. No license is granted to prepare any tank mixtures other than those expressly provided herein. This license is granted only to the purchaser of this product who has purchased the product from Bayer CropScience LP or one of its authorized distributors or retailers. The purchaser is not authorized to assign, sublicense or otherwise attempt to transfer this license to any third party, nor is purchaser authorized to prepare or recommend the preparation of any mixtures other than those expressly provided herein. This label serves as notice to any third party purchasing or receiving this product from any source other than Bayer CropScience LP or one of its authorized distributors or retailers, that such third party obtains no such license. Uses of the ALLECTUS 0.18 GC Plus Turf Fertilizer other than those expressly set forth on this label are not licensed through the purchase of this product, and the use of this product for other purposes may violate this license and other United States patent or other intellectual property rights of Bayer CropScience LP.

©Bayer AG, 2004

PRODUCED FOR



Bayer Environmental Science

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

Alllectus 0.18 GC Plus Turf Fertilizer (PENDING) Submitted 07/25/06