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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 16, 2011

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

Subject: Amendment: Per phone conversation on 5/10/2011 concerning Agency pyrethroid
letter dated 6/4/2009
Allectus 0.225 GC Plus Turf Fertilizer Insecticide
EPA Reg. No. 432-1427
Your Submission Dated May 18, 2011

Dear Dr. Pangilinan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

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

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander for".

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

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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.

GROUP	3	4A	INSECTICIDE
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ALLECTUS® 0.225 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 0.125%

Bifenthrin* 0.100%

OTHER INGREDIENTS: 99.775%

100.000%

EPA Reg. No. 432-1427

EPA Est. No. ____

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

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 13,613 sq. ft.

For control of surface feeders, treats up to 27,225 sq. ft.]

Net Content/Net Weight 20 Lbs. (9.07 Kg.) [For control of grubs, treats up to 5,445 sq. ft.

For control of surface feeders, treats up to 10,890 sq. ft.]

50 lbs. treats 27,800 sq. ft. (0.64 acre) at the 78 lbs. product/acre - LOW RATE (1.8 lbs/1,000 sq. ft.)

50 lbs. treats 17,800 sq. ft. (0.41 acre) at the 121 lbs. product/acre - MEDIUM RATE (2.8 lbs/1,000 sq. ft.)

50 lbs. treats 13,500 sq. ft. (0.31 acre) at the 161 lbs product/acre - (3.7 lbs/1000 sq ft)

50 lbs. treats 10,800 sq. ft. (0.25 acre) at the 200 lbs. product/acre - HIGH RATE (4.6 lbs/1,000 sq. ft.)

50 lbs. treats 6,800 sq. ft. (0.16 acre) at the 317 lbs. product/acre - HEAVY RATE (7.3 lbs/1,000 sq. ft.)

50 lbs. treats 5,200 sq ft (0.12 acre) at the 400 lbs. product/acre (9.2 lbs/1000 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 golf courses 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>."

ACCEPTED
AUG 16 2011
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
Registered under
EPA Reg. No. 432-1427

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

CAUTION

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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.	
<p>Note To Physician: No specific antidote is available. Treat the patient symptomatically.</p> <p>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.</p>	

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, using tobacco, or using the toilet. Remove contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long sleeve shirt and pants
- Shoes plus socks
- Chemical-resistance gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

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. 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.

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
- Chemical-resistance gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.
- 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: 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® 0.225 GC 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, *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*, *Nephelodes nenians*; armyworms, *Spodoptera* spp., *Pseudaletia* spp.; sod webworm, *Crambus* spp.; and mole crickets, *Scapteriscus* spp. ALLECTUS 0.225 GC PLUS TURF FERTILIZER can be used as directed on turfgrass on golf courses and sod farms.

The active ingredients ALLECTUS 0.225 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 0.225 GC 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 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 400 lb (0.5 lb of imidacloprid, 0.4 lb of bifenthrin) per acre per year.

APPLICATION EQUIPMENT

Apply ALLECTUS 0.225 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 0.225 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.

Resistance Management

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 0.225 GC 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 0.225 GC PLUS TURF FERTILIZER
Turfgrasses	Larvae of subsurface feeders: Asiatic garden beetle Black turfgrass ataeuius Black vine weevil European chafer European crane fly	Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer
	Adults and/or larvae of subsurface and surface feeding pests: Centipedes Fleas Millipedes Ticks	Imported fire ants Mole crickets Pillbugs Sowbugs
	Adults and/or larvae of surface feeders: Annual bluegrass weevil Billbugs Chinch bugs	Frit fly Leafhoppers Mealybugs Nuisance ants
	Larvae of surface feeders: Armyworm	Cutworm Sod webworms
		160 to 200 lb per acre (3.7 to 4.6 lb per 1000 sq ft)
		120 to 200 lb per acre (2.8 to 4.6 lb per 1000 sq ft) or for heavy infestations, a single annual application of 320 to 400 lb per acre (7.3 to 9.2 lb per 1000 sq ft)
		120 to 200 lb per acre (2.8 to 4.6 lb per 1000 sq ft)
		80 to 200 lb per acre (1.8 to 4.6 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 400 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, make a single repeat application of ALLECTUS 0.225 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: 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.

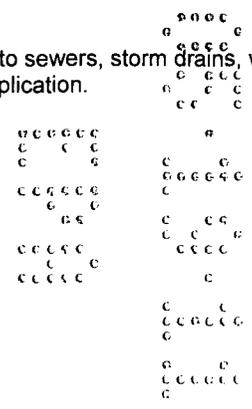
Spreader settings for ALLECTUS 0.225 GC Plus Turf Fertilizer

The following chart can be used as a guide in establishing an accurate rate of ALLECTUS 0.225 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	
		80 lb/A	200 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 0.225 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 400 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 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.
- 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, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience LP. 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.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE 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.

Allectus is a registered trademark of Bayer
Lesco and Poly Plus are registered trademarks of LESCO

PRODUCED FOR



Bayer Environmental Science

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

Allectus 0.225 GC Plus Turf Fertilizer (PENDING) 05/16/11

