

432-1464

11/30/2009

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

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Dear Dr. Pangilinan:

Subject: Dylox 420 SL Turf and Ornamental Insecticide
EPA Registration Number 432-1464
Submissions dated August 27, 2009, and November 11, 2009

The proposed amended label submitted on August 27, 2009, in response our letter dated August 5, 2009, is not accepted as that label was replaced by the label submitted on November 11, 2009

The proposed amended label submitted on November 11, 2009, is accepted under the provisions of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, with the stipulation that the changes listed below must be made to that label.

1. In the first phrase of promotional claims presented on page 1 under the name of the product, change "**For control of insects**" to "**For control of listed insects**".
2. In second sentence of the first bulleted item under "**RESTRICTIONS:**" (in the "**DIRECTIONS FOR USE**" section), change "**APPLICATION**" to "**APPLICATIONS**".
3. In eighth bulleted item under "**RESTRICTIONS:**", change "limit application to 3 per calendar year with minimum 7-day re-treatment intervals" to "limit the number of applications to 3 per calendar year with minimum re-treatment intervals of 7 days".
4. Revise ninth bulleted item under "**RESTRICTIONS:**" to read
 - Do not apply more than 24.5 lbs of active ingredient per acre per year for controlling grubs and mole crickets. Do not apply more than 16.2 lbs of active ingredient per acre per year for controlling surface-feeding insects.
5. As the tenth bulleted item under "**RESTRICTIONS**", insert the following:
 - Post-application irrigation is required.

- 6. As there are several paragraphs (or notes) which fall under it, the heading "NOTE:", in the middle of page 3, should be changed to "NOTES:".
- 7. In item "2" under the fourth paragraph of the "MIXING INSTRUCTIONS" (on page 3), change "(See Note)" to "(See NOTE: below)".
- 8. Change the heading for the third column of the "APPLICATIONS" table (on page 4) so that it reads "Application Rate in Fl. Oz. of DYLOX 420 SL Turf & Ornamental".
- 9. In the second paragraph of two-columns-wide text in the "APPLICATIONS" table, replace the first sentence ("For best ... hours") with the text shown below.

Minimize the amount of thatch present prior to application. After application (on the same day), irrigate with sufficient water to thoroughly wet the remaining thatch and top layer of the soil. If sufficient rainfall to thoroughly wet the thatch and top layers of soil occurs after application and prior to irrigation, further irrigation is not required.

A stamped copy of the label is enclosed for your records.

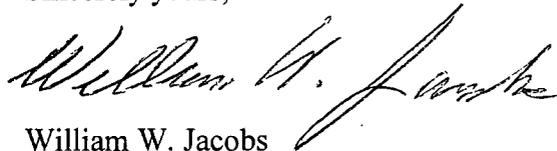
Submit two copies of final printed labeling before releasing this product for shipment under the labeling accepted via this letter.

The data requirements identified in Ms. Kylie Rothwell's letter of March 11, 2009, remain applicable.

If these conditions are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6(e).

If you have any questions regarding this letter, you may reach me by phone at 703-305-6406, by FAX at 703-308-0029, or via e-mail at jacobs.bill@epa.gov.

Sincerely yours,



William W. Jacobs
 Insecticide-Rodenticide Branch
 Registration Division (7505P)

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Dylox 420 SL Turf and Ornamental Insecticide

For control of insects on landscape flowers, shrubs and trees and landscape and recreational turf.
For use only on golf course and residential turf
For Control of White Grubs, Mole Crickets, Sod Webworms, Cutworms and Other Pests of Turfgrass
Controls damaging insects above and below the soil surface.

ACTIVE INGREDIENT:

*Trichlorfon.....	37.3%
OTHER INGREDIENT	62.7%
TOTAL	100.0%

*420 g trichlorfon/liter of formulated product

EPA Reg. No. 432-1464

EPA Est. No.

**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

Contains an organophosphate that inhibits cholinesterase.

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.

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.

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.

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

Note To Physician: Prolonged exposure will cause cholinesterase depression. Atropine Sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Do not take internally. Avoid contact with eyes, skin or clothing. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE):

Some materials that are chemical-resistant to this product are natural rubber, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, and polyvinylchloride (PVC). For more options, follow the instructions for category C on an EPA chemical-resistant category chart.

ACCEPTED
With COMMENTS
In EPA Letter Dated:

NOV 30 2009

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

432-1464

Mixers, loaders, applicators, and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves

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

Engineering Control Statements: When handlers use closed systems or enclosed cabs, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

User should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE 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 pesticide is toxic to fish and wildlife and is extremely toxic to aquatic invertebrates. Apply the product in strict accordance with label directions. For terrestrial uses, do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of waste.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Protect from freezing. 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 the container is leaking or material spilled for any reason or cause, begin immediate measures to contain the liquid by use of a spill kit or absorbent clay carrier and carefully sweep material into a pile preventing runoff into drains or waterways.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed below. 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 1-800-424-9300.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Do not use container in connection with food, feed, or drinking water. Completely empty container into application equipment. Offer for recycling, if available, or dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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 requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

RESTRICTIONS

- Use this product only as directed by its label. Do not apply this product to sites not listed in the APPLICATION table.
- Do not allow people or pets to enter the treated area until sprays have dried.

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- **Aerial application is prohibited.**
- **Do not apply this product through any type of chemigation system.**
- **Do not use this product on turf being grown for sale or other commercial use as sod. Do not use this product on turf being grown for commercial seed production or for research purposes.**
- **Do not apply this product to crops for food or forage.**
- Do not make foliar applications to trees, shrubs, bushes, or flowers. Ornamental plants may be treated only by applying spray to the soil at the base of the plant.
- For applications to turf, limit application to 3 per calendar year with minimum 7-day re-treatment interval.
- Do not apply more than 24.5 lbs of ai/A per year for controlling grubs and mole crickets. Do not apply more than 16.2 lbs of ai/A per year for controlling surface feeding insects.

Additional Restrictions for Golf Courses:

- Do not apply within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes, natural ponds, or estuaries.
- Broadcast use is limited to tees and greens. Use on fairways is limited to spot treatment.
- Post-application watering-in is required.

SPRAY DRIFT MANAGEMENT:

Do not allow spray to drift from the application site and contact people or structures that people occupy at any time. Do not allow spray to contact property associated with structures that people occupy or parks and recreation areas, nontarget crops, aquatic and wetland areas, woodlands, pastures, rangelands, or animals. Do not apply under circumstances where drift is possible to unprotected persons, or to food, forage, or crops intended for sale, use, or consumption.

For ground boom applications, apply with nozzle height more than 4 feet above the ground or crop canopy and when wind speed is 10 mph or less at the application site, as measured by an anemometer. Use coarse or coarser spray according to ASABE S-572 definition for standard nozzles or VMD for spinning atomizer nozzles.

The applicator must employ all other measures necessary to control drift.

NOTE: Spray droplets from applications of DYLOX 420 SL Turf and Ornamental Insecticide may cause spotting of paint finishes on aluminum and steel siding, automobiles, trucks and tractors. Do not allow spray droplets to contact metal painted surfaces. If accidental exposure does occur, the painted surface should be thoroughly washed immediately after exposure.

DYLOX 420 SL Turf and Ornamental Insecticide is a soluble concentrate which dissolves readily in water and is suitable for use in all power-operated ground sprayers.

Use specified dosage of DYLOX 420 SL Turf and Ornamental Insecticide in the amount of water necessary to give complete coverage of soil or turf. The type of equipment used will affect the concentration of product needed.

This product may be used on plants grown for aesthetic purposes or climatic modification in interior plantscapes, ornamental gardens or parks, or on golf courses or lawns and grounds.

MIXING INSTRUCTIONS

COMPATIBILITY / MIXING / ORDER-OF-MIXING

Observe all cautions and limitations on labeling of all products used in mixtures.

Dylox 420 SL Turf and Ornamental Insecticide is physically and biologically compatible with many registered pesticides and fertilizers or micronutrients. When considering mixing Dylox 420 SL Turf and Ornamental Insecticide with other pesticides, or other additives, first contact your supplier for advice. For further information, contact your local Bayer representative.

If your supplier and Bayer representative have no experience with the combination you are considering, conduct a test to determine physical compatibility. To determine physical compatibility, add the recommended proportions of each chemical with the same proportion of water as will be present in the chemical supply tank, into a suitable container, mix thoroughly, and allow the mixture to stand for five minutes. If the combination remains mixed, or can be readily remixed, the mixture is considered physically compatible.

The proper mixing procedure for Dylox 420 SL Turf and Ornamental Insecticide alone or in tank mix combinations with other pesticides is:

- 1) Fill the spray tank 1/4 to 1/3 full with clean water;
- 2) While recirculating and with the agitator running, add any products in PVA bags (**See Note**). Allow time for thorough mixing;
- 3) Continue to fill spray tank with water until 1/2 full;

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- 4) Add any other wettable powder (WP) or wettable granules (WG) products;
- 5) Add any "flowable" (FL or SC) type products;
- 6) Allow enough time for thorough mixing of each product added to tank;
- 7) Add the required amount of Dylox 420 SL Turf and Ornamental Insecticide, and any other 'SL'-type products; emulsifiable concentrates (EC), fertilizers, micronutrients, spray adjuvants;
- 8) Fill spray tank to desired level and maintain constant agitation to ensure uniformity of spray mixture.

NOTE: Do not use PVA packets in a tank mix with products that contain boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic that is not soluble in water or solvents.

APPLICATIONS		
CROP	INSECT	Fl. Oz. DYLOX 420 SL Turf & Ornamental
Landscape Ornamentals (including flowers, shrubs, and trees) and Recreational Lawns & Turf.	Cutworms — — — — — Cranberry girdler Armyworms Webworms, incl. sod webworm	4.6-6.9 per 1000 sq. ft. (200-300 fl oz per acre)
	Annual bluegrass weevil larvae	5.2-6.9 per 1000 sq. ft. (225-300 fl. oz. per acre)
	Annual bluegrass weevil (adults) Billbug larvae Mole crickets Chinch bugs White grubs (including larvae of Asiatic garden beetle, black turfgrass ataenius, European chafer, green June beetle, Japanese beetle, <i>Aphodius</i> spp., May or June beetles (<i>Phyllophaga</i> spp.), northern & southern masked chafers, sugarcane grub (<i>Tomarus</i> spp.), and Oriental beetle)	6.9 per 1000 sq. ft. (300 fl. oz. per acre)
<p>Mix specified dosage of DYLOX 420 SL Turf & Ornamental Insecticide in sufficient water to provide adequate distribution during application to lawn, turf or groundcover area. To ensure that the active ingredient reaches the soil surface, apply with a minimum of 2 gal of water per 1000 sq ft.</p> <p>For best results, minimize the amount of thatch present prior to application and irrigate with sufficient water to thoroughly wet the thatch and top layers of the soil as soon after application as possible, especially if rainfall does not occur within 24 hours. Under dry conditions, prewatering is recommended prior to application for optimum control of white grub and weevil larvae, particularly if thatch is present.</p> <p>If applied to newly-mowed <i>Poa annua</i> irrigate as soon as possible after application, particularly under conditions of high temperature and humidity. Potential injury may be exacerbated by tank mixing with other products, or by the addition of surfactants or other additives.</p> <p>If the turf is being maintained at a mowing height of greater than 1 inch, then the higher application rate (6.9 fl oz per 1000 sq ft) may be required during periods of high pest pressure.</p> <p>Do not use DYLOX 420 SL Turf and Ornamental Insecticide in hose-proportioned sprayers.</p> <p>Note: Do not use treated area or clippings from treated areas for feed or forage.</p> <p>For ornamentals, apply to soil around the plant.</p>		
Narcissus	Narcissus bulb fly	37
Apply specified dosage in 100 gallons of water as a drench per 1,000 feet of row . Direct stream to base of plants at beginning of adult fly activity (early May to June). Repeat treatments annually.		

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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 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 LP 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.

NET CONTENTS: 2 X 2.5 GALLONS

PRODUCED FOR



Bayer Environmental Science

A Business Group of Bayer CropScience LP
2 T. W. Alexander Drive
Research Triangle Park, NC 27709
1-800-331-2867

Dylox 420 SL Turf & Ornamental (PENDING) 05/04/09, Resubmitted 08/26/09, Resubmitted 11/11/09