



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT 24 2000

Ms. Sheila R. Kendrick
The Scotts Company
14111 Scottslawn Road
Marysville, Ohio 43041

Subject: Amendment - Additional Label Claims
Turf Builder with Fire Ant-X
EPA Reg. No. 538-260
Your Submission Dated September 12, 2000

Dear Ms. Kendrick:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

1. For fire ants, while we are aware of efficacy information indicating that bifenthrin is effective in the control of the foraging workers and new fly-in females, this data only shows control for up to 2 months. Because you are making a control claim on your label for this pest, you must specify that the consumer should retreat for fire ant every two months. Also claims such as "Keeps them away" are too promising and must be deleted from the labeling. We regret that this was overlooked in our previous review.
2. Regarding fire ant treatment associated with tall fescue (listed under Scotts Annual Lawn Care Program), your product should be applied at least 4 times a year, especially in the South. Amend the Directions for Use (and any associated graphics) accordingly.
3. The retreatment statements should include a maximum frequency of application, such as: "... but not more than ___ times per ___."

A stamped copy of the labeling is enclosed for your records. If you require any further correspondence on this matter, please contact Linda Werrell Gerber (703-308-8033) of my staff.

Sincerely

A handwritten signature in cursive script, appearing to read "Linda Werrell Gerber for".

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

Best copy available

2/3

NEW TECHNOLOGY

**KILLS TOUGH
LAWN INSECTS!**

MAXGUARD
EM 36005
100%
12-digit UPC
(non-suppressed)
0 32247 36005 10
PROOF OF PURCHASE
123000001
VD-PP

Scotts

MAXGUARD

Insect Protection with
Turf Builder Fertilizer

36005

Scotts

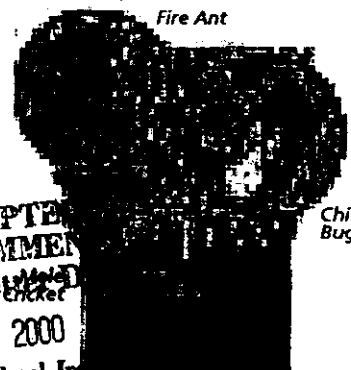
MAXGUARD™

Insect Protection with Turf Builder Fertilizer

Triple-action formula kills
insects, keeps them away,
and strengthens your lawn

Exclusive active ingredient
kills tough lawn insects

Hot weather formula, **ACCEPTED**
won't burn your lawn, with **COMMENT**
Guaranteed! * In EPA Letter



Fire Ant

Chinch Bug

ACTIVE INGREDIENT: Dinotefuran 0.147%
OTHER INGREDIENTS: 88.853%
Total 100.000%

*Ch contains 87% enantiomer, trans isomers 3% maximum.
EPA Reg. No. 538-268 EPA Est. No. 55640-01-002
TCASF 82657-04-3
For residential lawn use only.

KEEP OUT OF REACH OF CHILDREN
CAUTION
See back for additional precautionary statements.

24-3-10

NET WEIGHT 15.62 lb (7.08 kg) OCT 24 2000

Under the Federal Insecticide, and Rodenticide Act,
as amended, this pesticide
registered under EPA Reg. No.
538-268



MAXGUARD™

Insect Protection with Turf Builder Fertilizer

New MaxGuard™ contains Scotts exclusive active ingredient that kills fire ants, mole crickets, chinch bugs and many other tough lawn insects. Its unique triple-action formula kills insects, keeps them away and strengthens your lawn without burning.

The Scotts Advantage™

Every MaxGuard™ particle contains Scotts exclusive insect protection ingredient and a patented timed-release nitrogen, phosphorus and potassium formula.



For best results, apply Scotts Annual Lawn Care Program™

	St. Augustinegrass (Stenotaphrum secundatum)	Bentgrass, Bahia grass, Zoysia	Tall Fescue, Berggrasses
Jan - Feb	Apply	Apply	Apply
Feb - Mar	Apply	Apply	Apply
Mar - Apr	Apply	Apply	Apply
Apr - May	Apply	Apply	Apply
Jun - Jul - Aug	Apply	Apply	Apply
Aug - Sep	Apply	Apply	Apply
Sep - Oct	Apply	Apply	Apply
Nov	Apply	Apply	Apply

KEY PRODUCT FACTS

MaxGuard™ kills these lawn insects:

- | | | | | | | | | | | | |
|---|--------------------------------------|------------------|--------------------------|--------------------|------------------|-----------------------|--------------------|------------------|--|---------------------|--|
| Ants: Argentine Carpenter Flea Odorous | Termite: Formosan Red Harvest | Armyworms | Billbugs (adults) | Chinch Bugs | Fire Ants | Fleas (larvae) | Leafhoppers | Mealybugs | Mole Crickets (adults and nymphs) | Sod Webworms | Ticks: American Dog Tick Deer Tick (Includes ticks that may transmit Lyme Disease and Rocky Mountain Spotted Fever) |
|---|--------------------------------------|------------------|--------------------------|--------------------|------------------|-----------------------|--------------------|------------------|--|---------------------|--|

Directions for Use
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

General Use Instructions

- Apply as soon as insect activity or damage is first observed in the lawn.
- Spread uniformly over your lawn using the suggested spreader settings. For best results, use a Scotts spreader.
- Apply when the lawn foliage is dry. Water lightly immediately after application. See specific instructions on watering below.

Specific Instructions

CHINCH BUGS: A moderate watering-in (up to 1/4 inch) is necessary to reach the chinch bugs which are found in the thatch layer. Make applications in early spring or whenever chinch bug activity is noticed. Repeat applications throughout the growing season as needed.

MOLE CRICKETS: Make application as late in the day as possible and water with 1/2 inch of water. If the soil is not moist prior to application, it may be necessary to irrigate first to bring mole crickets closer to the surface where they are more likely to contact the insecticide. Let the lawn foliage dry and then apply MaxGuard™. Mole crickets are best controlled by treating the young nymphs. For best control, treat prior to peak egg hatch in the spring.

FIRE ANTS: A broadcast application will control foraging workers and new fly-in females and will prevent reinfestation of fire ants from neighboring areas. You should treat your entire lawn. For best results, treat during the morning or later evening when it is cool and the fire ants are most active. For complete control, treat established mounds with a mound control product 2-3 days prior to applying MaxGuard™.

FLEA LARVAE: Water in with 1/2 inch of water. Flea larvae develop in the soil of shaded areas where pets frequent.

TICKS: Apply in the spring when ticks are first noticed. A light watering (1/10 inch) is required to activate the insecticide. Repeat as needed.

ARMYWORMS, CUTWORMS, SOD WEBWORMS: Water with 1/10 inch of water after application to activate the insecticide.

Storage and Disposal

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

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original container only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use close tightly.

PESTICIDE CONTAINER DISPOSAL: Do not reuse empty bags. Wrap bags and put in trash.

Spreading Tips
Apply header strip. Then apply product in longest direction of lawn.

Spreader Settings
For best results, use a Scotts spreader
Covers 5,000 sq. ft.

Spreader	Setting	Directions
Scotts Drop Spreaders	6	Apply header strip; apply longest direction of lawn, overlapping wheel marks.
Scotts AccuGreen® Drop	5 3/4	Make each pass about 30 inches from previous pass to overlap spread width.
Scotts SpeedyGreen® Rotary	3 1/2	Make each pass about 5 feet from previous pass to overlap spread width.

Additional Spreader Settings

EZ Drop, Republic (#530)	6
EZ Broadcast, Republic (#540)	3 1/2

(Use Scotts spreader settings as approximate. You may need to adjust for proper coverage.)

KEEP OUT OF REACH OF CHILDREN

CAUTION
PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Harmful if inhaled, swallowed or absorbed through skin. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with skin, eyes, or clothing. Wash thoroughly after handling and before smoking or eating. Do not store near food or feed. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

First Aid:

IF SWALLOWED: Call a physician or Poison Control Center. Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger, or if available by administering syrup of ipecac. If person is unconscious do not give anything by mouth and do not induce vomiting.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation occurs and persists.

Note to Physicians: This product is a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

Environmental Hazards:
This pesticide is extremely toxic to fish, and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater or rinseate.

Guaranteed Analysis

MaxGuard™	24-3-10	F643
Total Nitrogen (N)	24%	24%
4.8% aminomethacryl nitrogen		
10.6% urea nitrogen		
7.9% other water soluble nitrogen*		
0.7% water insoluble nitrogen		
Available Phosphorus (P ₂ O ₅)	3%	3%
Soluble Potash (K ₂ O)	10%	10%
Sulfur (S)	7.5%	7.5%
7.5% combined sulfur (S)		
Iron (Fe) (Total)	2%	2%
Manganese (Mn) (T.A.)	1%	1%

Derived from: urea, methylenedurea, ammonium sulfate, ammonium phosphate, potassium sulfate, iron oxide, and manganese oxide.

*Contains 5.8% slowly available methylenedurea and dimethylenedurea nitrogen.

Questions / Information

Consumer Helpline
1-800-543-TURF (8873)

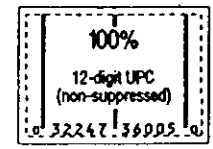
Visit our website
www.scottslawn.com

SMG
The Scotts Company
14111 Scottslawn Rd.
Marysville, Ohio 43041

U.S. Patent Nos. 5,102,440 and 4,378,238
Product of U.S.A.

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Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-sc.com>



Scotts No-Quibble Guarantee
If for any reason you, the consumer, are not satisfied after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly. This refund policy does not apply to professional applications.