



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 21, 2021

Christopher Zemanek
Sr. Analyst, Regulatory Affairs
The Scotts Company
14111 Scottslawn Road
Marysville, OH 43041

Subject: Registration Review Label Mitigation for Bifenthrin
Product Name: BULB
EPA Registration Number: 538-313
Application Date: February 18, 2021
Decision Number: 571402

Dear Mr. Zemanek:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Bifenthrin Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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If you have any questions about this letter, please contact DeMariah Koger by phone at (703)-347-0425, or via email at koger.demariah@epa.gov .

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

NOTE:

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BULB

Active Ingredient	
Bifenthrin*	0.20%
Other Ingredients	<u>99.80%</u>
Total	100.00%

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back/side/top/bottom [panel/label] for additional precautionary statements.

For Outdoor Use Only/For Residential Lawn Use Only

Coverage denoted by “X” will be added to FPL. Coverage will not exceed regulatory limits for the individual active ingredient.

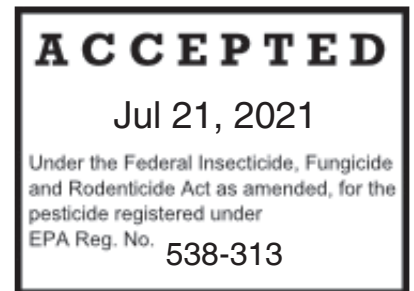
- [Covers/treats XXXX sq ft/XX ft x XXX ft]
- [Covers/treats XX acres] [(1/8 acre = 5,445 sq ft)]
- [Covers/approximately the area of X tennis courts/football fields per pound of product]
- [This package applies X lbs of product per 1,000 sq ft.]

NET WEIGHT/WT. XX.XX LBS (X.XX kg)

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EPA Est. No. 538-OH-1, XXX-XX-X (***insert additional EPA Registered Establishments***)

[Superscript used is first letter of run code on end of container]



NOTE:

EPA Reg. No. 538-313

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Optional Company Identifier: Scotts®

Alternate Brand Names: Snap Pac Fire Ant Killer

Optional Product Descriptors [Granular] Fire Ant Killer [for Lawns]
for [use [only] with] ***insert name*** cartridge/spreader/applicator/system

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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed, absorbed through the skin or inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing dust. Wear long sleeved shirt and long pants, shoes, socks, and chemical resistant gloves. 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.

FIRST AID:

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 by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on Skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 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 poison control center or doctor, or going for treatment. Call: 1-877-465-5161

Note to Physician:

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.

User Safety Recommendations: User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS:

This pesticide is extremely toxic to fish and aquatic invertebrates. 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 will help to prevent run off to water bodies or drainage systems.

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DIRECTIONS FOR USE

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

The maximum application rate for this product is 0.2 lbs. of bifenthrin per acre.

[USE RESTRICTIONS]

- People and pets must not re-enter treated areas until after granules have been watered in and treated area has dried.

[WHEN TO APPLY]

- Do not make applications during rain.
- [For best results], apply during the morning or late evening when it is cool and the ants are most active.
- [In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.]

[WHERE TO APPLY]

- For outdoor use only.
- Use only with the Scotts SNAP Spreader.
- Apply uniformly to [residential] [the] lawn (s)/grass, and water lawn after application to wash granules from the lawn foliage.
- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios.
- Sweep product from hard surfaces onto the lawn to keep product on the grass ~~–or–~~ Sweep any product that lands in the driveway, sidewalk or street back onto your lawn.
- [In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).]
- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
- Do not apply the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.

HOW TO APPLY

- Apply this product directly to the lawn area. Water treated area immediately after application. Do not irrigate to the point of runoff.
- Do not allow the product to enter any drain during or after application.
- Each pass should be within 5 feet of another pass to ensure proper overlap
- Do not make applications during rain.
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.



Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos.

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store product in clean, dry place for your next application. Product can be used until empty.

PESTICIDE CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Do not dispose down-the-drain or sewer. Call your local solid waste agency for local disposal instructions.

There are no spreader settings for this product as the cartridge design specifications are for a coverage of 4,000 sq. ft. Product will be sold for use only with the cartridge/snap/spreader/applicator/system, therefore calibrating to the correct amount of product automatically.

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APPLICATOR SET UP [AND INFORMATION]

[insert name]

[Just pop it on, flip the lever and go!]

[Icon]: Connect/Snap [Place Into Spreader]

[Icon]: Lock [Flip Lever to Lock in Place]

[Icon]: Apply/Go/Roll [You're Ready to Go]

[Icon]: [EdgeGuard/Feature/Control]

[Icon]: [[Finish] [&] [Store]]

- [See back panel for setup guide]
- **[Lock/Snap & Go] [Snap, Lock, Go] [Cartridge/Snap Pac] connects directly to the [insert name] spreader/applicator** [There's no cutting/no pouring/no spilling] [from heavy bags] [Simply place the Snap Pac /cartridge into the spreader/applicator]
- **[Flip the lever to lock cartridge/Snap Pac into place]** [Cartridge/Snap Pac automatically sets the proper application rate]
- **[Easy to apply]** Follow Directions for Use below/above
- **[Easy to control]** [The new & improved/exclusive EdgeGuard feature directs product only where you want it]
- **[Easy to finish & store]** [Just flip the lever back to remove the Snap Pac/cartridge.] [It self-seals for no mess/no touch/no-waste/easy clean-up & storage.]

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OPTIONAL MARKETING CLAIMS

The following claims may appear on any label panel

GENERAL CLAIMS

- Quick release granules and deep penetrating formula
- Don't treat just the infested areas of the lawn where mounds are visible. Treat the entire lawn to control reinfestation of fire ants from neighboring areas.
- Control will be optimized by combining broadcast applications that will control foraging workers and newly mated fly-in queens with mound treatments that will kill existing fire ant colonies.

PESTICIDAL CLAIMS

- 4 month Fire Ant Control
- Controls Fire Ants for 6 months
- Kills foraging Fire Ants
- Controls/Keeps new Fire Ant mounds from forming for [up to] 4 months
- Kills the Mound
- Kills Fly-in Queens
- Kills Fire Ants and other Listed Ants
- Kills/Controls fire ants for [up to] 4 months
- One application provides 4 month control of fire ants
- 4 month fire ant control/killer/kill
- Lasts [up to] 4 months for fire ant control
- 1 application controls fire ants for 4/6 months
- Controls fire ant mound formation for [up to] 4 months

PRODUCT EFFICACY CLAIMS

The following claims may be listed on the FPL followed by any or all ants that may be listed below

- [Ants killed [include/including:]]
- [Kills [the following] [these] [X (*insert number corresponding to ants listed on FPL*) [of]]]:
- [Kills ants including:]

To Kill:

- Ants [(including)]:
 - Argentine
 - Fire ants
 - Odorous
 - Pyramid
 - Pavement
 - Red Harvester

The following claims may be preceded by "New" and "Now" for a period of not longer than six (6) months from date of initial distribution.

CARTRIDGE CLAIMS

- A snap/easy to start/apply/finish/store
- [All you have to do is] [just] pop it on, flip the lever and go!
- Available in your choice of [x] formulas/cartridges/Snap Pac[s]
- Cartridge/Product/Snap Pac can be used until empty
- Cartridge/ Snap Pac locks into place [and automatically sets the proper application rate]
- Compact size fits easily in storage areas
- Easy/simple to use
- [Flip the lever to lock cartridge/Snap Pac into place] [ICON]

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- For many, lawn care is a [big] chore.
- If additional cartridges/Snap Pac [s] are needed to complete/finish your lawn application, simply flip/slide lever back [to release/unlock/re-seal/seal/close cartridge/Snap Pac] [from spreader/applicator] [ICON]
- Insert/connect new cartridge/Snap Pac[s] [lock into place] [and go] [and continue applying] [ICON]
- ***[Insert name]***/Self-contained/Lock/Snap & Go [cartridge/ lawn care/system] [connects directly to the spreader/applicator] [locks into place] [and] automatically sets the proper application rate.
- It's easy to get started
- [It's/***insert name*** is] the revolutionary/patented/specially designed/exclusive/lightweight/self-contained/no mess/touch/guess/guess proof/mess proof/lock/snap & go [lawn care] [application/applicator/spreader/system].
- [It] transform[s] the way you take care of your lawn [making it easy/easier] [than ever before]
- [It] Take[s] the mess/guesswork out of lawn care [so you get [the] right application rate/great results]
- [It's] Ready to go when you are
- It's easy/easier [than ever before] [to get [the right application rate]/[great results]]
- Lock/Snap & Go
- Snap, Lock, Go/Roll
- No guess/mess application
- No manual spreader/applicator settings [to adjust]
- No mess/guess/hassle
- No mess start/finish
- No touch/spill/ waste storage [with the [unique/self-sealing] cartridge/***insert name***/lawn care/system].
- [Now] [there's a/the] revolutionary [new] way to take care of your lawn
- Once empty, cartridges/Snap Pac[s] cannot be reused
- Proper application rate is set automatically [with the [***insert name***/self-contained/Lock/Snap & Go] [cartridge/lawn care/system]
- Reduces the mess/inconvenience/effort/hassle of lawn care
- Snap Pac/Cartridge
- [Self contained] [lock/snap & go] [cartridge/Snap Pac connects directly to [***insert name***] spreader/applicator [so/means/there's] [no cutting/pouring/spilling/opening] [from heavy bags]]/[no need to cut open or pour from heavy bags]
- Self-sealing cartridge/Snap Pac [makes clean-up and storage a snap]/[means [a] no waste/spill/touch clean up/storage]
- Store cartridges/product/Snap Pac [s] in a clean, dry place [for your next application]
- [The] [exclusive/patented/specially designed/revolutionary/lock/snap & go] [cartridge/***insert name*** /lawn care/applicator/system] automatically sets the proper application rate [so] [there are no manual spreader/applicator settings [required/to adjust.]].
- [The] [cartridge/Snap Pac] [automatically] self-seals [upon removal] [making clean up and storage a snap/easy/easier] / [for no touch/waste/mess/easy [clean-up/storage]]
- The [no mess/guess/touch/pour] lawn care/application system
- [There's] no cutting/pouring/spilling/opening [from heavy bags] [with the [unique/self-contained] cartridge/Snap Pac]
- [The] [***Insert name***] cartridge/spreader/applicator/system improves/reinvents the application/lawn care experience
- [Use] [the] [lock/snap & go] Cartridge/ Snap Pac [works] exclusively with the [***insert name***] spreader/applicator/system [ICON]
- [There's] no cutting/pouring/spilling/opening [from heavy bags] [with the [unique/self-contained] cartridge/Snap Pac]
- [The] [***Insert name***] cartridge/spreader/applicator/system improves/reinvents the application/lawn care experience
- [Use] [the] [lock/snap & go] Cartridge/ Snap Pac [works] exclusively with the [***insert name***] spreader/applicator/system [ICON]
- The [lock/snap & go] cartridge/Snap Pac is designed to be used only in the [exclusive/specially designed/patented/revolutionary] [***insert name***] spreader/applicator/system [ICON]
- [Lock/Snap & go] Cartridge/Snap Pac is designed specifically/exclusively for the [***insert name***] spreader/applicator/system [ICON]
- [The] cartridge/Snap Pac snaps/locks easily into place [ICON]
- The [guess/mess proof] [self-contained] [lock/snap & go] [lawn care [cartridge/applicator/spreader/system] [that] [takes the guesswork out of lawn care]
- The [no guess/mess] [self-contained] [lock/snap & go] [lawn care] [cartridge/spreader/applicator/system] [that] [takes the guesswork out of lawn care]
- The [guess proof/mess proof/no guess/no mess] [self-contained] [lock/snap & go] [cartridge/spreader/applicator/lawn care/system] [that] [makes great results easy/easier/a snap]

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- The [guess proof/mess proof/no guess/no mess] [self-contained] [lock/snap & go] [cartridge/spreader/applicator/lawn care/system] [that] [[gives you [the right application rate/great results]] [from start to finish]
- The EdgeGuard feature on the [*insert name*] spreader/applicator [allows for one-sided spreading] / [lets you close off application on one side of spreader] so product is not wasted/released on [unwanted] [areas like] driveways/sidewalks/flowerbeds [ICON]
- Use [this/the] [lock/snap & go] [cartridge/Snap Pac] only with the [new] [specially designed/exclusive/patented/revolutionary] [*insert name*] [spreader/applicator/system] [ICON]
- You're ready to go
- Your hands don't have to touch the product
- The easier way to apply fire ant killer
- Makes lawn application easier
- Makes lawn care faster/easier
- [The] Easier to use Lawn Care System
- Use only with the Scotts SNAP Spreader [System]

Contact the experts at scotts.com

SCOTTS...the lawn people

[icon]

[Distributed by/for -or- Manufactured by/for :]

The Scotts Company
14111 Scottslawn Rd.
Marysville, OH 43041

This container is made with a minimum of X% recycled material.

Made in U.S.A./Product of _____(with US and imported parts/products)

[Questions/Comments/Information]

[icon - phone]

Call -or- consumer helpline -or- phone toll-free -or- Scott's [toll-free] consumer hotline -or- contact us
1-800-543-TURF (8873)

[Open 8:00 a.m. to 5:00 p.m. Eastern time]

[icon – computer mouse]

[Visit [our website]]

www.scotts.com

WARRANTY / GUARANTEE INFORMATION

Scotts [No-Quibble/Consumer] Guarantee[®]

If for any reason you [the customer/consumer] are not satisfied [with the results] after using this product, you are entitled to get your money back. Simply send us proof of purchase and we will mail you a refund promptly.

-OR-

[NOTICE: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.]

TRADEMARK/PATENT/COPYRIGHT INFORMATION

U.S. Patent No. X,XXX,XXX (*patent information will be added to FPL*)

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