



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

James L. Kunstman, Ph.D.
Director of Regulatory Services
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, Missouri 64101

FEB 15 2008

RE: Notification to add Advertising Claims
EPA Registration Number: 2217-909
Date of Submission: December 18, 2007

Dear Dr. Kunstman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, December 18, 2007, for the product, Grub-No-More. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
---	---	--	-----------------------

Application for Pesticide - Section I

1. Company/Product Number 2217-909	2. EPA Product Manager Ms. Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Grub-No-More	PM# Product Manager—Team 1	
5. Name and Address of Applicant (Include ZIP Code) PBI/Gordon Corporation Post Office Box 014090 Kansas City, Missouri 64101 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
--	---

NOTIFICATION

FEB 15 2008

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification Per Pesticide Registration Notice (PRN) 98-10:

We ask to add the following to the label for the registration approved 9/25/2007:

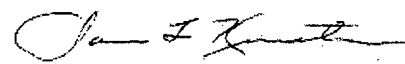
1. The additional brand name: Gordon's Grub-No-More Granules
2. A substatement under the ingredient statement: Active Ingredient: 0.2% imidacloprid, CAS Registry No. 138261-41-3.
3. A simple graphic within the directions for use
4. Table 1 (Spreader Settings) has been made more specific, and an additional resource regarding spreader settings has been added For additional spreader settings, please visit our website at www.pbigordon.com/homefarm

This notification is consistent with the provisions of **PR Notice 98-10** and EPA regulations at 40 **CFR** 152.46, and no other changes have been made to the labeling or Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of **PR Notice 98-10** and 40 **CFR** 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Section 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <i>* Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 30 pounds	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name James L. Kunstman, Ph.D.	Title Director of Regulatory Services	Telephone No. (Include Area Code) 816-460-6292	
Certification <i>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</i>			6. Date Application Received (Stamped)
2. Signature 	3. Title Director of Regulatory Services		
4. Typed Name James L. Kunstman, Ph.D.	5. Date December 18, 2007		

3/10

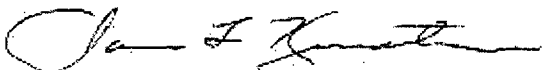
Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
2217-909	12/18/2007	002217-00909.20071218.Notif

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

12/18/2007

Date

James L. Kunstman, Ph.D.

Name (typed)

Director, Regulatory Services

Title

NOTIFICATION

FEB 15 2008

4/10

Grub-No-More™

Alternate Brand Name: Gordon's Grub-No-More Granules

FOR OUTDOOR RESIDENTIAL USE ONLY

Not for sale, sale into, distribution and/or use in Nassau, Suffolk, Kings and Queens Counties of New York State.

ACTIVE INGREDIENT:

Imidacloprid.....	0.2%
Other Ingredients	99.8%
TOTAL.....	100.0%

Active Ingredient: 0.2% imidacloprid, CAS Registry No. 138264-41-3

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET WEIGHT: 30 POUNDS

AP121807
EPA Reg. No. 2217-909
EPA Est. No. 2217-KS-1
Made in USA

NOTIFICATION

FEB 15 2008

MANUFACTURED BY:



Telephone: 800-821-7925

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

002217-00909.20071218.Notif
EPA Reg. No. 2217-909 Grub-No-More



READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> • 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 ON SKIN OR CLOTHING:	<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.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for to a doctor. You may also contact 1-877-800-5556 for emergency medical information.</p> <p>Active Ingredient: 0.2% imidacloprid, CAS Registry No. 138261-41-3.</p> <p>Note To Physician: No specific antidote is available. Treat the patient symptomatically.</p>	

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water.

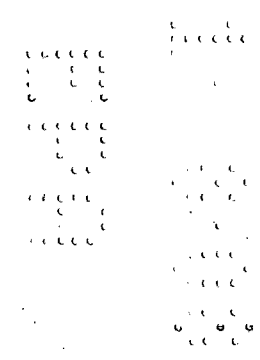
Do not contaminate water when cleaning equipment or disposing of equipment washwater.

DIRECTIONS FOR USE

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

Read all directions for use and conditions of sale before using.

For residential use on lawns and landscaped areas.



APPLICATION TO LAWNS:

What Gordon's Grub-No-More does:

White grubs can cause extensive damage to turf by feeding on grass roots. Affected turf turns yellow, then brown, and is easily pulled up in pieces with your hands. Mole crickets can seriously damage lawns by their tunneling activity. Some species also feed on the grass roots, as well. **Grub-No-More** prevents turf damage by killing grubs and mole crickets when they are newly hatched and before they can cause turf damage.



Grub-No-More works best when applied before grubs and mole crickets hatch. The active ingredient will remain in the root zone of the turf until the eggs of grubs or mole crickets hatch. These newly hatched insects are highly susceptible to imidacloprid, and are killed before they become large enough to cause turf damage. **Grub-No-More** also kills grubs in landscaped ornamental areas containing flowers, groundcovers, shrubs and trees.

If you have questions regarding the best time to make applications in your area, you can consult your local County University Extension Office. Be sure that you describe the product you are using when seeking such advice.

Pests Controlled:

White grubs (including the larvae of Japanese beetle, Oriental beetle, chafers, Asiatic garden beetle, May or June beetles, and black turfgrass ataenius) and mole crickets.

How to Apply:

Using either a drop-type or rotary-type spreader, apply **Grub-No-More** uniformly over the area being treated. Avoid the use of spreaders which may apply the product in narrow, concentrated or uneven bands. Calibrate your spreader according to the spreader manufacturer's directions to ensure the proper amount of **Grub-No-More** is applied. Check frequently to be sure spreader is working properly and spreading granules evenly.

After Applying:

Grub-No-More will work best if the lawn is watered thoroughly or if rainfall occurs within 24 hours after application to move the active ingredient through the thatch and down into the soil. Avoid mowing lawn until watering or rainfall has occurred so that the uniformity of the granules is not disturbed.

When to Apply:

Grub-No-More works best when applied before grubs and mole crickets hatch.

For best results, apply as follows:

White grubs: Apply once, anytime from April through mid-August.

Mole crickets: In Florida, apply once from early April through early May. Elsewhere, apply once from mid-May through mid-June.

Do not apply **Grub-No-More** when turf areas are waterlogged. The product may not work effectively under these conditions.

How Much to Apply:

For control of white grubs, **Grub-No-More** should be applied at the rate of 2.87 pounds of product per 1,000 square feet. For mole cricket control, apply 3.8 pounds of product per 1,000 square feet. **Table 1** can be used as a guide for applying the proper rate of **Grub-No-More**. However, the application rate can vary depending on the speed of application and the condition of the spreader. For best results, use a normal, steady pace when applying to obtain an accurate, even application.

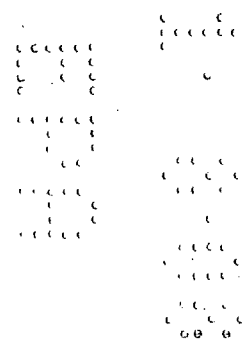
Table 1. SPREADER SETTING TABLE AND APPROXIMATE TREATED AREAS		
Spreader Model	Application Rates	
	Setting to deliver 2.87 pounds of product per 1,000 sq. ft.ft.	Setting to deliver 3.8 pounds of product per 1,000 sq.ft.
Earthway Rotary	13	15
Precision Drop	12	14
Precision Rotary	4.7	5.9
Red Devil Rotary	7	8
Sears Rotary	3	3.5
Scotts Accugreen	5.25	5.75
Scotts Edgeguard	3.25	4
Scotts Precisiongreen	4	4.5
Scotts Speedygreen	3.25	4
Scotts Tractor	3	3.5
Spyker Rotary	4.75	5.25

Settings are approximate. The condition of your spreader, the speed at which you walk and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer's directions.

Tip: 1,000 sq ft = 20 ft x 50 ft

Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Be sure the spreader works properly and spreads granules evenly.

For additional spreader settings, please visit our website at www.pbigordon.com/homefarm.



APPLICATION TO LANDSCAPE PLANTINGS
(Trees, Shrubs, Evergreens, Flowers, Groundcovers)

Pests Controlled:

White grubs (including larvae of Japanese beetle, Oriental beetle, chafers, Asiatic garden beetle, May and June beetle, and black turfgrass ateniensis).

How to Apply:

Apply as a broadcast treatment to soil, mulch or other substrate. Prior to application, remove black plastic from area to be treated to allow water to penetrate into the soil. Permeable weed barriers need not be removed prior to application.

After Applying:

Grub-No-More will work best if material is worked into the soil around plants or if a thorough watering of rainfall occurs within 24 hours after application to move the product down through mulch and into the soil.

When to Apply:

The best control of grubs will be obtained if **Grub-No-More** is applied before grubs begin to hatch. For best results, application should occur from April through mid-August.

DO NOT apply to waterlogged areas. Imidacloprid may not work effectively under these conditions.

How Much to Apply:

Grub-No-More should be applied at the rate of 2.87 pounds of product per 1,000 square feet. This 30 pound bag will treat 10,000 square feet of landscaped plantings. However, the application rate can vary depending on the speed of application and the condition of the spreader.

[Optional Text--

Table 2 can be used as a guide for applying the proper rate of **Grub-No-More**

Table 2.

Bag Size	Treated Area, sq. ft.
30 Pounds	10,000 sq. ft. ft.

End Optional Text]

NOTE: DO NOT apply **Grub-No-More** to vegetable gardens.

STORAGE AND DISPOSAL

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

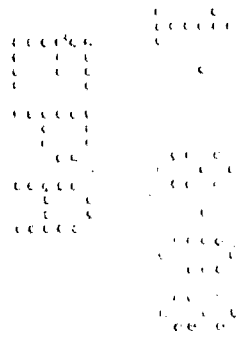
Storage Conditions: Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

Disposal

- If empty:** Do not reuse container. Place in trash or offer for recycling if available.
- If Partly Filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED. TO THE EXENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.



APPENDIX:

I. Advertising claims that may be presented on the container labels or promotional information supporting this product.

- Lawn and garden insecticide
- Season long grub control
- Use anytime...spring through late summer
- For residential use on lawns and landscaped areas.
- Kills white grubs and mole crickets early, before they damage your lawn.
- Apply before insects hatch to prevent turf damage.
- One application controls grubs all season long.
- One application stops grubs all season long.

