



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

OCT 28 1999

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

John Thornton
Bayer Corporation, Agriculture Division
8400 Hawthorne Road
P.O. Box 4913
Kansas City, MO 64120-0013

Subject: Merit 0.25 Plus Lawn and Garden Fertilizer
EPA Reg. No. 3125-472
Application for amended registration, dated October 22, 1999 - Label revision
and alternate brand name.

Dear Mr. Thornton,

Your proposed revised label for EPA Reg. No. 3125-472, which was submitted in finished format on October 22, 1999, has been reviewed. The label is acceptable at this time provided you make the changes indicated below at the next printing of your label.

1. The alternate brand name, Bayer ADVANCED LAWN Season-Long Grub Control with Fertilizer Ready-to-Spread Granules, must be modified by deleting the phrase "ADVANCED LAWN" from the product name. Since there has been no change in the product formulation since the initial registration the phrase "ADVANCED LAWN" is considered false and misleading and, as such is not considered acceptable either as part of the product name or as a separate marketing claim. We note that our May 24, 1999 letter regarding revised CLI (Consumer Labeling Initiative) labeling for this product required that the phrase "ADVANCED PROTECTION FORMULA" be deleted from the front panel of the proposed label. This statement is a comparative advertising claim relative to effectiveness and may be false or misleading in comparison with other products that don't include such a statement on their labels. According to 40 CFR 156.10(a)(5), no advertising claims may be false or misleading in any way. In addition, claims that are exaggerated or unsubstantiated can not be made on the label.
2. Add the statement "FOR OUTDOOR RESIDENTIAL USE" to the front panel of the label; this statement appears on all of the recently accepted labels for Bayer products with similar lawn and garden uses.

3. The following statement was included on the front panel of the last stamped accepted label (May 24, 1999) and must be added to the front panel of the revised label as one of the bullet points under the product name:
- * For Use On: Lawns, Ground Covers, Flower Beds, and around Trees and Shrubs.*
4. As you know, EPA will soon be issuing a PR Notice concerning improvements to the format and content of "First Aid" statements (formerly "Statement of Practical Treatment") on all pesticide product labels. The "First Aid" statements in the upcoming PR Notice will supersede the statements that are listed in the December 1996 Label Review Manual. In addition, EPA is currently revising the Label Review Manual; the revised manual will incorporate the updated "First Aid" statements from the PR Notice. At this time, we recommend that you incorporate the updated "First Aid" statements on your new product label by revising the instructions under "FIRST AID" to read as follows:

"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.

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 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 the eye. Call a poison control center or doctor for treatment advice."

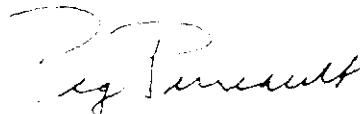
You may continue to use the same format for the First Aid section that is used on your label submitted October 22, 1999 (i.e. the box format with the headings "IN CASE OF ACCIDENTAL.....SWALLOWING, CONTACT WITH SKIN, CONTACT WITH EYES" - followed by the above text in bullet format).

Since the label submitted on October 22, 1999 is in finished format and is substantially similar to the last accepted label (stamped May 24, 1999), and since the revisions requested above do not raise risk concerns associated with the use of this product, we will allow you to use this labeling for a period not to exceed January 31, 2000. Products released for shipment after January 31, 2000 must bear labeling revised in accordance with this letter.

Please submit one copy of your revised final printed labeling before you release the product for shipment. If the above specified conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this letter, please contact me by phone at (703) 305-5417 or via E-mail at Perreault.peg@epamail.epa.gov.

Sincerely yours,



Peg Perreault
Chemical Manager, Team 4
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure (1)

Bayer 

Bayer+
ADVANCED
LAWN

Season-Long Grub Control with Fertilizer

ADVANCED LAWN™

Under the Federal
Fungicide, and Rodenticide
Act, as amended, for the use as a
registered under EPA Reg. No.
3125-472

TREATS
UP TO
5,000
SQ FT

Season-Long Grub Control with Fertilizer 12-18-6

READY-TO-SPREAD GRANULES

- ▶ Convenient 2-in-1 Formula:
One Application Kills Grubs All Season Long and Fertilizes Your Lawn
- ▶ Apply anytime spring through late summer
- ▶ Also kills mole crickets



KEEP OUT OF REACH OF CHILDREN
CAUTION See back panel for ingredients and precautionary statements
HARMFUL IF SWALLOWED
CAUSES EYE IRRITATION



NET WT 15 LBS (6.8kg)

Bayer+
ADVANCED
LAWN

Season-Long
Grub Control with Fertilizer

READY-TO-SPREAD GRANULES

Season-Long Grub Control with Fertilizer



Season-Long Grub Control with Fertilizer

Bayer Advanced Lawn Season-Long Grub Control With Fertilizer performs two important jobs. One application kills grubs all season long and fertilizes your lawn all at the same time. Keeping your lawn free of damaging grubs has never been easier.

READY-TO-SPREAD GRANULES

READ THE LABEL FIRST!

QUICK FACTS	
<ul style="list-style-type: none"> • Unique Double Action Formula – Kills White Grubs Before They Damage Lawns – Feeds Root Systems – Also Controls Mole Crickets • Easy-to-Use Granules 	
KILLS	White Grubs (larvae of the Asiatic Garden Beetles, Black Turfgrass Aeneas, Chafers, Japanese Beetles, May or June Beetles, and Oriental Beetles), and Mole Crickets.
FEEDS	12-18-6 Helps root systems by promoting new growth
COVERAGE	This bag covers up to 5,000 sq ft
WHERE TO USE	Lawns, Flower Beds, Ground Covers, and around Trees & Shrubs
WHEN TO USE	May through mid-August
HOW MUCH TO USE	See spreader settings

ACTIVE INGREDIENT: Imidacloprid 11.35%	GUARANTEED ANALYSIS 12-18-6 Total Nitrogen (N) 12%
OTHER INGREDIENTS: 98.23% FERTIFOL	12% Ammoniacal Nitrogen Available Phosphate (P ₂ O ₅) 18% Soluble Potash (K ₂ O) 6% Sulfur (S) 11%

*Other ingredients include Premium Fertilizer, Sulfur and Sulfates.
Imidacloprid is the chemical name for Merit Insecticide.
EPA Reg. No. 1125-472
EPA Est. No. indicated by the 2nd or 3rd digit of the label number on this package.
EPA # 1905-CAL-1 48-1-1431-1-01
1271-0199R-001-011 1431-0199-001

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, read and follow all label directions.

BEFORE YOU USE
Read and follow these directions when using:

- Do not apply near fish ponds, ponds, streams or lakes.
- Do not use in vegetable gardens.

HOW TO USE	
TO CONTROL	WHEN TO APPLY
GRUBS	Apply once anytime from May through mid-August
MOLE CRICKETS	Apply once anytime from mid-May through mid-June *Florida residents: Apply once anytime between early April through early May

For best results, apply Season-Long Grub Control with Fertilizer before grubs or mole crickets hatch. Contact your County Extension Agent for the ideal dates to apply in your area.

LAWNS
How Much: See Spreader Settings
Adjust spreader to the proper setting (see Spreader Settings).
To be sure you cover the entire area uniformly, hold the border of the lawn then fill in the center. Make parallel passes, walking at a steady pace to ensure even distribution of the granules.
Water thoroughly after applying.

FLOWER BEDS, GROUND COVERS, TREES & SHRUBS
How Much: 2 Tablespoons per 10 sq ft of planting bed; 1-1 1/4 cups per 100 sq ft of planting bed.
Spread granules evenly to the soil over flower beds, ground cover plantings, shrub beds, and under trees.
TIP: A hand held spreader makes this easy.
Raise granules into the soil around plants.
Water thoroughly after applying.

Children and pets may re-enter after the treated area has been watered and allowed to dry.

FOR BEST RESULTS

- Apply early, before grubs and mole crickets hatch.
- Water thoroughly within 24 hours after applying.
- Do not mow until the granules are watered into the soil.
- Avoid applying Season-Long Grub Control with Fertilizer to waterlogged areas, as this may decrease the product's effectiveness.
- You may spread Season-Long Grub Control with Fertilizer over soil or mulch. If present, remove weed barrier before applying.

SIGNS OF DAMAGE TO LAWNS	
GRUBS	White grubs cause extensive damage to lawns by feeding on grass roots. Grass turns yellow, then brown, and dies. Grubs chew on roots so that the grass is easily pulled up in pieces with your hands. You can roll it back like a carpet to reveal the grubs. If patches of dead grass appeared in your lawn late last summer, check for grubs.
MOLE CRICKETS	Mole crickets often cause extensive damage by tunneling through lawns. Some species also feed on roots. Tunneling uproots the grass so it easily dries out. Lawns turn yellow, become thin, weedy, and can eventually die.
HOW IT WORKS	After Season-Long Grub Control with Fertilizer granules are watered in, a protective zone is formed in the soil. It applied early, Season-Long Grub Control with Fertilizer kills grubs and mole crickets when they hatch... before they can cause damage.

Spreader Settings
If your spreader is not listed, please call our Consumer Service Hotline at 1-877-BayerAL for help.
Rate for grubs: 3 lbs per 1,000 sq ft.
Rate for mole crickets: 1 lbs per 1,000 sq ft.

SPREADER SETTINGS		
Broadcast Spreaders	3 lb Rate Setting	Distance Between Passes (Ft.)
Model	Setting	Passes (Ft.)
CYCLONE ROTARY	4.0	2.0
EARTHWAY ROTARY	13.0	7.0
EV-N-SPRED	13.0	7.0
K-GRO ROTARY	1.5	8.0
ORTHO ROTARY	1.5	8.0
PRECISION ROTARY (#5850)	4.0	3.0
RED DEVIL ROTARY	4.0	3.0
REPUBLIC EZ ROTARY (#540)	1.5	8.0
SCOTT'S EASYGREEN (#EG-3)	26.3	3.0
SCOTT'S SPEEDYGREEN 1000	2.5	4.0
SCOTT'S SPEEDYGREEN 2000	3.5	4.0
SCOTT'S SPEEDYGREEN 3000	5.5	4.0
SEARS ROTARY	1.5	8.0
TRUE TEMPER ROTARY	4.0	2.0
VIGORO ROTARY	4.0	3.0

Drop Spreaders		
Model	3 lb Rate Setting	Distance Between Passes (Ft.)
AMES DROP	3.5	N/A
K-GRO DROP	8.0	N/A
ORTHO DROP	8.0	N/A
REPUBLIC EZ DROP (#536)	8.0	N/A
SCOTT'S ACCUGREEN 1000	6.25	N/A
SCOTT'S ACCUGREEN 2000	4.25	N/A
SCOTT'S ACCUGREEN 3000	3.0	N/A
SEARS DROP	8.0	N/A
STA-GREEN DROP	3.5	N/A

*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 as described in manufacturer's instructions.
TIP: 1000 sq ft = 20 ft x 50 ft.
Do not use a spreader that applies granules in narrow rows instead of even bands. Be sure the spreader works properly and spreads granules evenly.

IMPORTANT - Directions for Storage and Disposal

STORAGE CONDITIONS Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

CONTAINER DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Do not re-use empty product bags.
- Securely wrap the empty product bag in several layers of newspaper.
- Place in trash.

Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines.

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 +

IN THE CASE OF ACCIDENTAL ... IMMEDIATELY ...

SWALLOWING

- Call a doctor or Poison Control Center for treatment advice.

CONTACT WITH SKIN

- Wash thoroughly with soap and water.
- Get medical attention if irritation occurs.

CONTACT WITH EYES

- Hold eye open and rinse eye slowly and gently with water.
- Continue to rinse eye for 10 to 15 minutes.
- Call a doctor if irritation persists.

NOTE: When calling poison control center, have this product label as available. If seeking treatment at an emergency room, doctor's office, bring this product label to show medical personnel.

For medical emergency information, you may call toll-free 1-877-229-3763. Active Ingredient: Imidacloprid (CAS # 138261-41-3)

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.

NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Season-Long Grub Control with Fertilizer under expected conditions. The Bayer assumes responsibility for lack of performance or safety if not used according to the directions.
Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

Made in USA

Owned by:
Bayer Corporation
Garden of Professional Care
Box 9111
Lansing, MI 48241-9111

LAWN TIP:
If you have recently applied lawn fertilizers, we recommend that you use Bayer Advanced Lawn Season-Long Grub Control without Fertilizer.

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Bayer and are registered trademarks of Bayer AG.

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