

PM 04

3125-507

05/26/99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MAY 26 1999

John S. Thornton  
Bayer Corporation  
8400 Hawthorn Road  
P.O. Box 4913  
Kansas City, MO 64120-0013

Dear Mr. Thornton:

Subject: Labeling Amendment  
Dylox Grub Control  
EPA Registration No. 3125-507  
Your submission dated 23 April 1999

The labeling amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, has been received and reviewed, and the following are the Agency's comments:

1. The phrase "ADVANCED PROTECTION FORMULA" must be deleted. 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 of their labeling. You should refer to 40 CFR 156.10(a)(5) for a more detailed explanation of what are considered false or misleading statements.
2. You have added numerous marketing claims to the front panel of your proposed label which were not included on previously accepted labels for the subject product. Although some similar marketing claims were included on the last accepted label for this product, the additional proposed claims are not considered acceptable at this time and must be deleted from you labeling.
3. Your other CLI-related labeling claims including the revised format for your labeling are acceptable.

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Since this product label may be used as an example of CLI recommended revisions, please submit one copy of your revised final printed labeling prior to displaying the product labeling to the public and releasing your product for shipment. A stamped copy is enclosed for your records.

Sincerely,



Leonard Cole  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

[FRONT PANEL]

# Dylox<sup>®</sup> Grub Control

## Insecticide

### GUARANTEED SATISFACTION READY-TO-USE

DYLOX is a fast-acting insecticide which kills:

- white grubs,
- mole crickets,
- sod webworms, and
- cutworms.

For Use On: Lawns

### ADVANCED PROTECTION

- Kills Grubs within 24 hours
- Kills Grubs Now
- *Delivers Overnight Results*
- Fast Results
- Nothing Kills Grubs Faster
- Kills on Contact
- No Second Chance
- *Stops Grubs From Further Damaging Lawn*
- For Use After First Signs of Grubs (generally July through September)
- Rescues Lawn From Grubs
- Degrades Quickly -- Does Not Linger
- Also Controls Sod Webworms, Mole Crickets, Cutworms

Net Contents: 15 lbs (30 lbs)

Treats 5,000 (10,000) sq ft

**STOP - Read This Entire Label Before Use**  
**KEEP OUT OF REACH OF CHILDREN**

**FOR OUTDOOR RESIDENTIAL USE**

## CAUTION

HARMFUL IF SWALLOWED

See back panel for ingredients and precautionary statements

**ACCEPTED**  
**With COMMENTS**  
**In EPA Letter Dated:**  
**MAY 26 1999**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

3125-507

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[BACK PANEL]

Quick Facts (Product Facts)	
<ul style="list-style-type: none"> <li>• Easy-To-Use Granules</li> <li>• Overnight control</li> <li>• Kills Grubs within 24 hours</li> <li>• Kills on Contact</li> <li>• Stops Grubs From Further Damaging Lawn</li> <li>• For Use After First Signs of Grubs (generally July through September)</li> <li>• Degrades Quickly -- Does Not Linger</li> </ul>	
KILLS	White Grubs (ART: WHITE GRUB) (larvae of chafers and Japanese beetles) Mole Crickets (ART: MOLE CRICKET) Sod Webworms and Cutworms
COVERAGE	This bag covers 5,000 sq ft (15 lb bag) (white grubs, mole crickets) 7500 sq ft (Sod webworms, cutworms) [15 LB BAG] This bag covers 10,000 sq ft (15 lb bag) (white grubs, mole crickets) 15,000 sq ft (Sod webworms, cutworms) [30 LB BAG]
WHERE TO USE	Lawns
WHEN TO USE	When grubs are present, usually July through September
HOW MUCH TO USE	See spreader settings
(ART: GRAPHIC OF PHONE)	Questions, comments, or medical information call 1-800-842-8020 www.bayer.com

If you use DYLOX Grub Control Insecticide as directed and are not completely satisfied, we will promptly refund your money. For details, call us at 1-800-842-8020.

Ingredients

ACTIVE INGREDIENT:

Trichlorfon .....	6.2%
OTHER INGREDIENT* .....	93.8%
	100.0%

\* Other ingredient is Corn cob granules

EPA Reg. No. 3125-507

EPA Est. No. XXXX-AA-XX

PRECAUTIONARY  
STATEMENTS

Hazards to Humans and Domestic Animals

- Harmful if swallowed
- Do not breathe dust
- Avoid contact with eyes, skin or clothing
- Do not apply with hand-held or chest-mounted spreader
- May cause allergic skin reactions in some people
- Wash thoroughly after handling and before eating or smoking

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# DYLOX Grub Control Insecticide

## First Aid

IN THE CASE OF ACCIDENTAL...	IMMEDIATELY...
Swallowing	If the person is able to swallow: <ul style="list-style-type: none"> <li>Have them sip 1 to 2 glassfuls of water</li> <li>Call a doctor or poison control center for further treatment advice</li> </ul>
Contact with eyes	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water.</li> <li>Continue to rinse eye for 10 to 15 minutes.</li> <li>Call a doctor if irritation persists.</li> </ul>
Inhalation	<ul style="list-style-type: none"> <li>If breathing is affected, move person to fresh air</li> <li>Contact doctor or poison control center for further treatment advice</li> <li>If not breathing, call an ambulance and give artificial respiration.</li> </ul>
<b>NOTE:</b> When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. You may call 800-414-0244 for medical emergency information. Active Ingredient: Trichlorfon [CAS # 52-68-6] <b>Note to Physician:</b> Prolonged exposure will cause cholinesterase depression. Atropine Sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.	

## Environmental Hazards

- This pesticide is toxic to fish, bird and wildlife. Do not apply directly to water.
- Do not contaminate water when cleaning equipment or disposing of equipment wash water.
- Apply this product only as specified on this label.

## 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 pools, ponds, streams or lakes.
- Do not apply to waterlogged soil.
- Water grass as soon as possible after application to move product to root zone where insects feed.
- Do not allow children or pets on treated lawn until grass has been watered and allowed to dry.

## How to Use

TO CONTROL	WHEN TO APPLY
Grubs	Apply when grubs are present, usually July - September.
Mole Crickets	Apply when mole crickets are present, July - August.
Cutworms Sod Webworms	Mid-May through Mid-June

For best results, apply DYLOX Grub Control Insecticide when grubs are actively feeding. Contact your County Extension Agent for the ideal dates to apply in your area.

## LAWNS

<b>How Much:</b> See Spreader Settings Adjust spreader to the proper setting (see Spreader Settings). (ART)	To be sure you cover the entire area uniformly, first treat 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. (ART)	Water thoroughly after applying. (ART)
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#### FOR BEST RESULTS

- Apply when grubs are present.
- Water thoroughly within 24 hours after applying.
- Do not mow until the granules are watered into the soil.
- Avoid applying DYLOX Grub Control Insecticide to waterlogged areas, as this may decrease the product's effectiveness.
- You may spread DYLOX Grub Control Insecticide 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 off 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.

#### SIGNS OF DAMAGE TO LAWNS (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.

#### SIGNS OF DAMAGE TO LAWNS (sod webworms and cutworms)

Sod webworms and cutworms damage lawn by cutting blades of grass near the ground. Small brown patches will appear. Cutworms can also be seen in the lawn. Webworms nest down in the thatch layer, coming up to feed at night.

#### HOW IT WORKS

DYLOX Grub Control Insecticide is intended to be used when insects and grubs are present. After granules are watered in, insects are killed on contact. The active ingredient then degrades quickly.

# **DYLOX Grub Control Insecticide**

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## **Spreader Settings**

If your spreader is not listed, please call our Consumer Service Hotline (xxx) xxx-xxxx for help.  
 Rate for Grubs and Mole Crickets: 3 lbs per 1,000 sq ft  
 Rate for Sod Webworms and Cutworms: 2 lbs per 1,000 sq ft

SPREADER	SETTING*	
	To Deliver 3 lbs per 1,000 sq ft	To Deliver 2 lbs per 1000 sq ft
Vigoro Drop Vigoro Rotary Sta-Green Drop Sta-Green Rotary Bandini Ev-N-Spread Rotary Ortho Drop Ortho Rotary Precision Drop Precision Rotary Quaker Rotary Republic EZ Drop Republic EZ Grow Republic EZ Rotary Scotts Drop Scotts Accugreen Scotts Easygreen Scotts Evengreen Scotts Speedy Green True Temper Rotary ADD: NEW TWO-IN-ONE SPREADERS	Spreader settings TBD	Spreader settings TBD

\* 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: 1000 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.

## **STORAGE AND DISPOSAL**

### **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.

#### **Disposal**

- Do not contaminate water, food, or feed by storage or disposal.
- Do not reuse empty product bags.
- Securely wrap the empty product bag in several layers of newspaper and place bag 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.

#### **NOTICE**

Research and testing has determined that the "Directions for Use" are appropriate for the proper use of DYLOX Grub Control Insecticide under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Bayer Corporation  
 Garden & Professional Care  
 Box 4913, Kansas City, MO 64120-0013  
 Product Information: (800) 842-8020



## U.S. LABEL

Reason to Issue: To revise based on EPA letter.

Date of Draft: 05/20/99 (S)  
Supersedes Pre-Reg Draft Dated: 04/23/99

[FRONT PANEL]

# Dylox<sup>®</sup> Grub Control

## Insecticide

## READY-TO-USE

DYLOX is a fast-acting insecticide which kills:

- white grubs,
- mole crickets,
- sod webworms, and
- cutworms.

For Use On: Lawns

- Kills Grubs within 24 hours
- Delivers Overnight Results
- Nothing Kills Grubs Faster
- Stops Grubs From Further Damaging Lawn
- For Use After First Signs of Grubs (generally July through September)
- Degrades Quickly - Does Not Linger
- Also Controls Sod Webworms, Mole Crickets, Cutworms

Net Contents: 15 lbs (30 lbs)

Treats 5,000 (10,000) sq ft

**STOP - Read This Entire Label Before Use**  
**KEEP OUT OF REACH OF CHILDREN**

**FOR OUTDOOR RESIDENTIAL USE****CAUTION**

HARMFUL IF SWALLOWED

See back panel for ingredients and precautionary statements

~~REVIEWED~~  
In Accordance with the Label  
Based on Draft Labeling Data

May 26, 1999

reviewed 8/18/99

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# DYLOX Grub Control Insecticide

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## [BACK PANEL]

Quick Facts (Product Facts)	
<ul style="list-style-type: none"> <li>• Easy-To-Use Granules</li> <li>• Kills Grubs within 24 hours</li> <li>• Stops Grubs From Further Damaging Lawn</li> <li>• For Use After First Signs of Grubs (generally July through September)</li> <li>• Degrades Quickly - Does Not Linger</li> </ul>	
KILLS	White Grubs (ART: WHITE GRUB) (larvae of chafers and Japanese beetles) Mole Crickets (ART: MOLE CRICKET) Sod Webworms and Cutworms
COVERAGE	This bag covers 5,000 sq ft (15 lb bag) (white grubs, mole crickets) 7500 sq ft (Sod webworms, cutworms) [15 LB BAG] This bag covers 10,000 sq ft (15 lb bag) (white grubs, mole crickets) 15,000 sq ft (Sod webworms, cutworms) [30 LB BAG]
WHERE TO USE	Lawns
WHEN TO USE	When grubs are present, usually July through September
HOW MUCH TO USE	See spreader settings
(ART: GRAPHIC OF PHONE)	Questions or comments, call toll-free (877) 229-3725 www.AdvancedLawn.com

### Ingredients

#### ACTIVE INGREDIENT:

Trichlorfon	6.2%
OTHER INGREDIENT*	93.8%
	100.0%

\* Other ingredient is Corn cob granules

EPA Reg. No. 3125-507

EPA Est. No. XXXX-AA-XX

### PRECAUTIONARY STATEMENTS CAUTION

#### Hazards to Humans and Domestic Animals

- Harmful if swallowed
- Do not breathe dust
- Avoid contact with eyes, skin or clothing
- Do not apply with hand-held or chest-mounted spreader
- May cause allergic skin reactions in some people
- Wash thoroughly after handling and before eating or smoking

### First Aid

IN THE CASE OF ACCIDENTAL...	IMMEDIATELY...
Swallowing	If the person is able to swallow. <ul style="list-style-type: none"> <li>• Have them sip 1 to 2 glassfuls of water</li> <li>• Call a doctor or poison control center for further treatment advice</li> </ul>
Contact with eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water.</li> <li>• Continue to rinse eye for 10 to 15 minutes.</li> <li>• Call a doctor if irritation persists.</li> </ul>
Inhalation	<ul style="list-style-type: none"> <li>• If breathing is affected, move person to fresh air</li> <li>• Contact doctor or poison control center for further treatment advice</li> <li>• If not breathing, call an ambulance and give artificial respiration.</li> </ul>
<b>NOTE:</b> When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. You may call (877) 229-3763 for medical emergency information. Active Ingredient: Trichlorfon [CAS # 52-68-6] <b>Note to Physician:</b> Prolonged exposure will cause cholinesterase depression. Atropine Sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.	

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## DYLOX Grub Control Insecticide

### Environmental Hazards

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- Do not contaminate **water** when cleaning equipment or disposing of equipment wash water.
- Apply this product **only** as specified on this label.

### 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** pools, ponds, streams or lakes.
- Do not apply to **waterlogged** soil.
- Water grass as **soon** as possible after application to move product to root zone where insects feed.
- Do not allow children or pets on treated lawn until grass has been watered and allowed to dry.

### How to Use

TO CONTROL	WHEN TO APPLY
Grubs	Apply when grubs are present, usually July - September.
Mole Crickets	Apply when mole crickets are present, July - August.
Cutworms Sod Webworms	Mid-May through Mid-June

For best results, apply DYLOX Grub Control Insecticide when grubs are actively feeding. Contact your County Extension Agent for the ideal dates to apply in your area.

### LAWNS

<b>How Much:</b> See Spreader Settings Adjust spreader to the proper setting (see Spreader Settings). (ART)	To be sure you cover the entire area uniformly, first treat 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. (ART)	Water thoroughly after applying. (ART)
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FOR BEST RESULTS
<ul style="list-style-type: none"> <li>• Apply when grubs are present.</li> <li>• Water thoroughly within 24 hours after applying.</li> <li>• Do not mow until the granules are watered into the soil.</li> <li>• Avoid applying DYLOX Grub Control Insecticide to waterlogged areas, as this may decrease the product's effectiveness.</li> <li>• You may spread DYLOX Grub Control Insecticide over soil or mulch. If present, remove weed barrier before applying.</li> </ul>

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Sod webworms and cutworms damage lawn by cutting blades of grass near the ground. Small brown patches will appear. Cutworms can also be seen in the lawn. Webworms nest down in the thatch layer, coming up to feed at night.

**HOW IT WORKS**

DYLOX Grub Control Insecticide is intended to be used when insects and grubs are present. After granules are watered in, insects are killed on contact. The active ingredient then degrades quickly.

**Spreader Settings**

If your spreader is not listed, please call our Consumer Service Hotline toll-free (877) 229-3725 for help.

Rate for Grubs and Mole Crickets: 3 lbs per 1,000 sq ft

Rate for Sod Webworms and Cutworms: 2 lbs per 1,000 sq ft

SPREADER	SETTING*	
	To Deliver 3 lbs per 1,000 sq ft	To Deliver 2 lbs per 1000 sq ft
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<p>* 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.</p> <p>Tip: 1000 sq ft = 20 ft x 50 ft</p> <p>Do not use a spreader that applies granules in narrow, concentrated, or uneven bands. Be sure the spreader works properly and spreads granules evenly.</p>		

## STORAGE AND DISPOSAL

## 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.

**Disposal**

- Do not contaminate water, food, or feed by storage or disposal.
- Do not reuse empty product bags.
- Securely wrap the empty product bag in several layers of newspaper and place bag 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.

**NOTICE**

Research and testing has determined that the "Directions for Use" are appropriate for the proper use of DYLOX Grub Control Insecticide under expected conditions. The Buyer 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.