

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

OCT 29 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:

Dylox Grub Control

EPA Reg. No. 3125-507

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. 3125-507, 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 24 Hour Grub Killer 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 26, 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. The statement "FOR OUTDOOR RESIDENTIAL USE" was included on the front panel of the last stamped accepted label (May 26, 1999) and must be added to the front panel of the revised label.

3. The following statement was included on the front panel of the last stamped accepted label (May 26, 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."

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 is 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 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."

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible."

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 EYES, INHALATION" - 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 26, 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)

ADVANCED LAWN

24 HOUR

Grub Killei

Bayer



ADVANCED

TREATS
ACCESTODOS
WITH CORSO ELE

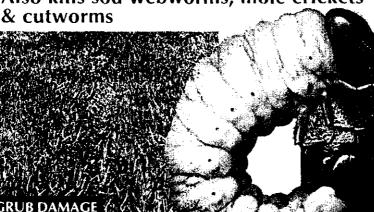
Oct. 29, 1999

rub Kile Con position of the Control of the Control

READY-TO-SPREAD GRANULES

- Nothing works faster on grubs-overnight results
- Degrades quickly...will not linger

Also kills sod webworms, mole crickets



Overnight Results



KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel for ingredients
HARMFUL IF SWALLOWED

CAUSES EYE IRRITATION

NET WT 15 LBS (6.8kg)

ADVANCED LAWN



Grub Killer

READY-TO-SPREAD GRANULES





Bayer Advanced Lawn 24-Hour Grub Killer rescues your lawn from active grub damage. Nothing kills grubs faster.

READY-TO-SPREAD GRANULES

READ THE LABEL FIRST!

QUICK FACTS

- · For Use After First Signs of Grubs

Stops Grups From Furtner Damaging Lawn Degrades Quickly Easy-to-Use Granules		
KILLS	White Grubs, Mole Crickets and other listed pests	
COVERAGE	This bag covers up to 5,000 sq it (White Grubs, Mole Crickets) 7500 sq it (Sod Webworms, Cutworms)	
WHERE TO USE	Lawns	
WHEN TO USE	When grubs are present, usually July through September	
HOW MUCH TO USE	See spreader settings	

T

For questions or comments, call toll-free at 1-877-BayerAL or visit us on-line at www.AdvancedLawn.com

INGREDIENTS ACTIVE INGREDIENT: OTHER INGREDIENT

*Other ingredient is Com cob granules

(PA Reg. No. 3125-507

EPA Est. No indicated by 2nd and 3rd digits of the batch number on this package (77) ± 070989-MC-001 40 ± 5905-IA-01

Cutworms, White Grubs clarvae of Chafers and Japanese Beetles), Mole Crickets, and Sod Webs

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labelling. 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 gives a soon as provide after application to more product to mor zone where inverts level.
 Do not allow children or pets on impated lawn until grass has been watered and allowed to dry

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

大 1	٦

LAWNS

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 Arid-Atay through Asid-June

For best results, apply 24-Hour Grub Killer when grubs are actively feeding. Contact your County Extension Agent for the ideal dates to apply in your area

How Much: See Spreader Settings

Adjust spreader to the proper setting (see Spreader Settings).

To be sure you cover the entire area uniformly, first treat the border of the lawn then full in the center. Make parallel passes, walking at a sleady pace to ensure even distribution of the granules.

Water thoroughly after approving

- Apply when grubs, mole chickets, and sod webworns are present
 Water thoroughly within 24 hours after applying
- Do not mow until the granules are watered into the soil Avord applying 24-Hour Crub Killer to waterlogged areas, as this may decrease the product's effectivene
 You may spread 24 Hour Crub Killer over soil or mulch, if present, remove weed barrier before applying.

FOR BEST RESULTS

SIGNS OF DAMAGE TO LAWNS While gruts cause extensive damage to lawns by feeding on grass roots. Crass turns sellow, then brown and dies. Crabs chew oil roots so: that the grass is easily pulled up in perces with your hands. You can roll it but it like a carpet to reveal the grubs. If patches of indead GRUBS



Mole crickets often cause extensive flamage by tunneling through lawns. Some species also leed on roots. Tunneling uproots the grass so it easily dries out. Lawns turn yellow, become thin, weedy and can eventually die MOLE CRICKETS

grass appeared in your lawn late last summer, check for grubs

Sod webworms and cutworms damage tawn by cutting blades of grass near the ground. Small brown patche will appear. Cutworms can also he seen in the lawn, Webworms near down in the thatch layer, coming up to SOD WEBWORMS AND CUTWORMS

Bayer Advanced Lawn 24-Hour Gruh Killer is intended to be used when insects and grubs are present, Afre granules are watered in, insects are killed on contact. The active ingredient then degrades quickly, HOW IT WORKS

Spreader Settings 1 - Augustein is not fixed, place call our Consumer Service Horline at 1-877-BayerAl, for help Raie or Grabs and Mole-Crickes - 3 for per 1,000 og fl Raie or Sod Webworms and Curvorms - 2 lbs per 1,000 og fl

SPREADER SETTINGS			
Broadcast Spreaders T	2 It) Rate	3 to Rate	Distance Between
Hodel 🙀	Setting	Setting	Passes (PL)
CYCLONE ROTARY	4,0	4.25	5.0
EARTHWAY ROTARY	10	11	6.0
EN-A-SPRED	10	11	6.0
K-GRO ROTARY	1.5	2.0	8.0
ORTHO ROTARY	1.5	2.0	6.0
PRECISION ROTARY (#5850)	2.0	3.0	2.5
RED DEVIL ROTARY	2.0	3.0	2.5
REPUBLIC EZ ROYARY (#540)	1.5	2.0	8.0
SCOTTS EASYGREEN (#EG-3)	26	26.5	2.5
SCOTTS SPEEDYGREEN 1000	2.0	2.5	4.0
SCOTTS SPEEDY CREEN 2000	4.0 1	4.5	3.6
SCOTTS SPEEDYCREEN 3000	4.0	4.5	3.0
SEARS ROTARY	1.5	2.0	8.0
TRUE TEMPER ROYARY	4.0	4.25	5.0
VICORO ROTARY	2.0	3.0	2.5
Drop Spreaders	2 lb Rate	3 to Rate	Distance Between
Model (m)	Setting	Setting	Passes (Ft.)
LIMES DROP	3.5	6.5	N/A
K-CRO DROP	7.5	8.0	N/A
ORTHO DROP	7.5	8.0	N/A
PRECISION DROP (#FHZZG)	0.5	1.0	N/A
RED DEVIL DROP	0.5	1.0	N/A
REPUBLIC EZ DROP (#536)	7.5 İ	8.0	N/A
SCOTTS ACCUGREEN 1860	5.5	6.5	N/A
SCOTTS ACCUGREEN 2000	5.5	6.5	N/A
SCOTTS ACCUGREEN 3000	4.25	5.25	N/A
SCOTTS DROP (#PF1, PF2, PF3, PF4)	5.0	5.75	N/A
SEARS DROP	7.5	8.0	N/A
STA-GREEN DROP	3.5	6.5	N/A
VICORO DROP	0.5	1.0	N/A

Sense are approximate. The cost sense wour screater the speed at which you walk and cresen tenain may after the rate of application. Califorate your spill according to manufacture in directions.

- 105 (URD sq m = 20 ft x 50 m. Two not use a specialer that applies of anotes in narrow is occentrated in consent bands. Be sets the spreader works to specify and spreads granules or

IMPORTANT - Directions for Storage and Disposal

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

DISPOSAL

- . On not contaminate water, food, or feed by stryage or disposal Do not reuse empty product bags
 Securely wrap the empty product bag in several layers of newspaper
- Place has in trash.

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

- Harmful if swall

Do not preame our
 Aroid contact with eyes, skin or clothing
 Do not apply with hand-held or chest-mounted screater
 May cause allergic skin text tools in some people
 Wash thoroughtly after handling and before earing or smoking

FIRST AID + IN THE CASE OF ACCIDENTAL . .

CAUTION

IMMEDIATELY . . . if the person is able to swallow

SWALLOWING Have them sip 1 to 2 glassruls of water

Call a doctor or poison control center for further treasment advice

CONTACT WITH EYES

Hold everopen and rinse slowly and gently with water
 Continue to rinse eye for 10 to 15 minutes
 Call a doctor if initiation possists.

INHALATION

ii breathing is affected, move person to fresh a:

Contact doctor or poison control center for turner treatment advice.

if nor breathing, call an ambulance and give a nicial respiration.

NOTE: When calling poison control center, have this product lahel accessible, it seeing treatment at an ex-eigency doors it discribes office, bring this product label to show medical personnel.

or emergency medical information, you may call toll-free 1.877-229-3763. Active incredent: Tochlorion (CAS # 52-68-6) one to Physician Protonged exposure will cause cholineverare depression. Altopore Sulfate is anadotal 2-PAM is also antidotal and may be duffund-

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, bird and withfire (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 tabel.

NOTICE: Receipt and testing has determined that the "Directions for (pie" are appropriate for the pricer use of 24-Hour Crub After urger expected condense. The Buyer assumes reported bits for this of personnance or safety if an usual capacity to the directions distings fairt Considered it you are not availed with this product, me will glish refund your original burstward pro-

13 (in); MC164120-0013

gr and 🕣 are registered tractemarks or Bayer AC.

