



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 0.2 Granular Insecticide
EPA Reg. No. 3125-508
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. 3125-508, 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 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 19, 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 19, 1999) and must be added to the front panel of the revised label.
3. 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."

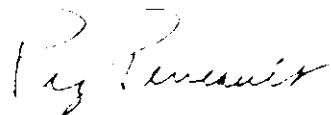
You may continue to use the same format for the First Aid section that is used on your label submitted October 22, 1999 (i.e. the box format with the headings "IN CASE OF ACCIDENTAL.....SWALLOWING, CONTACT WITH EYES" - followed by the above text in bullet format).

Since the label submitted on October 22, 1999 is in finished format and is substantially similar to the last accepted label (stamped May 19, 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 

ADVANCED LAWN™

TREATS
UP TO
5,000
SQ FT

Season-Long Grub Control

READY-TO-SPREAD GRANULES

- ▶ One application kills grubs all season long
- ▶ Apply anytime spring through late summer
- ▶ For use on lawns, ground covers & flower beds
- ▶ 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 14.35 LBS (6.51kg)

Bayer
ADVANCED
LAWN
Season-Long
Grub Control

Season-Long
Grub Control

Bayer
ADVANCED
LAWN

Season-Long Grub Control

READY-TO-SPREAD GRANULES

Bayer
ADVANCED
LAWN



Season-Long Grub Control

Bayer Advanced Lawn Season-Long Grub Control kills grubs all season long with a single application. 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"> • One Application Kills Grubs All Season Long • Kills White Grubs Before They Damage Lawns • Easy-to-Use Granules 	
KILLS	White Grubs (larvae of Chalcids and Japanese Beetles), and Mole Crickets
COVERAGE	This bag covers up to 5,000 sq ft (1,775 sq ft for Mole Crickets)
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

INGREDIENTS
ACTIVE INGREDIENT: Imidacloprid 0.25%
OTHER INGREDIENTS: 99.75%
 *Other ingredients include: Corn cob granules and dipropylene glycol to adhere the active ingredient on the granules. Imidacloprid is the chemical name for Merit® insecticide.
 EPA Reg. No. 3125-508
 EPA Est. No. indicated by 2nd and 3rd digits of the batch number on this package: 070989-MO-001 (46) = 5915-1A-01

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, streams or lakes.
 • Do not use in vegetable gardens.

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 before grubs or mole crickets hatch. Contact your County Extension Agent for the ideal dates to use in your area.

LAWNS
How Much: See Spreader Settings
How to Apply: 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 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; 1-1/4 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.
 Rake granules into the soil around plants.
 Water thoroughly after applying.

FOR BEST RESULTS WITH GRUBS & MOLE CRICKETS
 • Children and pets may re-enter after the treated area has been watered and allowed to dry.
 • 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 to waterlogged areas, as this may decrease the product's effectiveness.
 • You may spread Season-Long Grub Control over soil or mulch. If present, remove weed barriers 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.

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 FOR GRUBS AND MOLE CRICKETS
 After Season-Long Grub Control granules are watered in, a protective zone is formed in the soil. If applied early, Season-Long Grub Control 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: 2.87 lbs per 1,000 sq ft
 Rate for Mole Crickets: 3.8 lbs per 1,000 sq ft

SPREADER SETTINGS			
Broadcast Spreaders	2.87 lb Rate	3.8 lb Rate	Distance Between Passes (ft)
Model	Setting	Setting	
CYCLONE ROTARY	4.5	4.75	4.0
EARTHWAY ROTARY	11	12	2.5
EVAN-SPREAD	11	12	2.5
K-GRO ROTARY	2.0	2.5	6.0
ORTHO ROTARY	2.0	2.5	6.0
PRECISION ROTARY (PES-30)	4.0	3.0	2.5
RED DEVIL ROTARY	4.0	3.0	2.5
REPUBLIC EZ ROTARY (E540)	2.0	2.5	6.0
SCOTT'S EASYGREEN (EG-3)	27	28	2.5
SCOTT'S SPEEDYGREEN 1000	2.0	3.0	3.0
SCOTT'S SPEEDYGREEN 2000	6.5	7.0	5.0
SCOTT'S SPEEDYGREEN 3000	6.5	7.0	5.0
SEARS ROTARY	2.0	2.5	6.0
TRUE TEMPER ROTARY	4.5	4.75	4.0
VIGORO ROTARY	4.0	3.0	2.5
Drop Spreaders	2.87 lb Rate	3.8 lb Rate	Distance Between Passes (ft)
Model	Setting	Setting	
JAMES DROP	7.5	8.0	N/A
K-GRO DROP	8.5	9.5	N/A
ORTHO DROP	8.5	9.5	N/A
PRECISION DROP (PHE2G)	1.5	1.75	N/A
RED DEVIL DROP	1.5	1.75	N/A
REPUBLIC EZ DROP (E530)	8.5	9.5	N/A
SCOTT'S ACCUGREEN 1000	7.75	8.75	N/A
SCOTT'S ACCUGREEN 2000	7.75	8.75	N/A
SCOTT'S ACCUGREEN 3000	6.5	7.25	N/A
SCOTT'S DROP (PF1, PF2, PF3, PF4)	6.5	7.0	N/A
SEARS DROP	8.5	9.5	N/A
STA-GREEN DROP	7.5	8.0	N/A
VIGORO DROP	1.5	1.75	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. Calculate your spreader according to manufacturer's directions.
 TIP: 1000 sq ft = 20 ft x 50 ft
 Do not use a spreader that catches granules in narrow, concave areas or unevenly loads. 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 in 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.
 • 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.

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 further treatment advice.
CONTACT WITH EYES	• Hold eye open and rinse 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's label accessible. If seeking treatment at an emergency room or 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 # 139161-41-3)

ENVIRONMENTAL HAZARDS

• This pesticide is highly toxic to aquatic invertebrates. 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.

NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Season-Long Grub Control under existing 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

Distributed by
 Bayer Corporation
 Garden & Professional Care
 Box 4973
 Kansas City, MO 64110-0493

Merit is a registered trademark of Bayer Corporation.
 Bayer and EB are registered trademarks of Bayer AG.