



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 1, 2012

Joy Paff Amvac Chemical Corporation 4695 MacArthur Court, Suite 1250 Newport Beach, CA 92660

Subject:

Amendment - Updating Storage and Disposal Statement per PR Notice 2007-4

Wisdom® GC Granular EPA Reg. No. 5481-518

Your submission dated October 4, 2011

Dear Ms. Paff:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. Revise the Precautionary Statements to read as follows:
 - "Harmful is absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."
- 2. On the top panel replace "For use to Ants (including Imported Fire Ants), Mole Crickets and other insect pests ... etc" with "For use to Ants (including Imported Fire Ants), Mole Crickets and other listed insect pests ... etc".
- 3. Replace "etc...mound drenches that will eliminate existing colonies" with "etc...mound drenches that will control existing colonies" under the *Imported Fire Ants* section.
- 4. On page 7 replace "See comments section under Grass Applications for additional rate recommendations" with "See comments section under Grass Applications for additional rates"

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,

Lovanda aleyander for Richard Gebken

Product Manager Team 10

Insecticide Branch

Registration Division (7505P)

Enclosure

WISDOM® GC GRANULAR

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by Certified Applicators, or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

For use to control Ants (including Imported Fire Ants), Mole Crickets and other insect pests on lawns in landscaped areas and perimeters around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, golf courses, sod farms and athletic fields.

ACTIVE INGREDIENT:

Bifenthrin *	
INERT INGREDIENTS	99.8%
TOTAL	

^{*}Cis isomers 97% minimum, trans isomers 3% maximum.

KEEP OUT OF REACH OF CHILDREN

CAUTION

DO NOT USE THIS PRODUCT ON GOLF COURSES AND SOD FARMS IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK.

EPA Reg. No. 5481-518 EPA Est. No. 39578-TX-1

Made in U.S.A.

NET WEIGHT/U.S. Standard Measure

ACCEPTED with COMMENTS In EPA Letter Dated Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

	4		
1	-		

	FIRST AID			
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. 			
	EMERGENCY INFORMATION			
treatment.	t container or label with you when calling a poison control center or doctor, or going for LOWING EMERGENCIES, PHONE 24 HOURS A DAY:			
Transportation: CHEMTREC1-800-424				
Other: AMVAC1-323-2				
	NOTE TO PHYSICIAN			
	pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats rease absorption and so should be avoided.			

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing.

The following Personal Protective Equipment requirements apply to sod farm use only. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or butyl rubber
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS:

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from treated areas. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Do not apply by air.

Do not apply more than 0.2 lb. active ingredient (a.i.) per acre per application on residential use sites (i.e., around private homes, apartment buildings, condominiums, non-agricultural outbuildings, non-commercial greenhouses, pre-schools or day care facilities). May be applied at up to 0.4 lb. a.i. per acre per application on non-residential use sites (i.e., around institutional, public, commercial or industrial buildings; golf courses; sod farms; parks; recreational areas or athletic fields).

Do not broadcast apply more than 0.4 lbs. A.I. (200 lbs. Wisdom GC Granular) per Acre per year.

Do not apply within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries, and commercial fish farm ponds.

Not for use on nurseries, commercial greenhouses or grass grown for seed.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry to treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is:

- Coveralls
- Waterproof gloves
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries and greenhouses.

If watering in of the granules is necessary, do not allow people or pets on treated surfaces until the grass or soil is dry.

Do not touch treated surface until dry.

GRASS AND PERIMETER APLICATIONS

(Including Golf Courses and Sod Farms)

Grass Application: Broadcast Wisdom GC Granular with suitable application equipment to ensure uniform coverage over the treatment area.

APPLICATION RATES

The application rates listed in the following table will provide excellent control of the respective pests under typical conditions. However, at the discretion of the applicator, Wisdom GC Granular may be applied at up to 0.4 lb AI/A to control each of the pests listed in this table. However, for residential lawn use, do not apply more than 0.2 lbs. A.I. per Acre per application.

Pest	Active ingredient lbs. per acre	Application Rate Wisdom GC Granular		
Armyworms ¹	0.1	50 lbs.	1.15 lbs.	
Cutworms ¹	lbs. AI/A	per acre	per 1,000 sq. ft.	
Sod Webworm ¹				
Annual Bluegrass Weevil	0.1-0.2	50-100 lbs.	1.15-2.3 lbs.	
(Hyperodes) (Adult) ²	lbs. AI/A	per acre	per 1,000 sq. ft.	
Billbugs (Adult) ³				
Black Turfgrass Ataenius (Adult) ⁴				
Leafhoppers				
Mealybugs				
Ants	0.2-0.4	100-200 lbs.	2.3-4.6 lbs.	
Centipedes	lbs. AI/A	per acre	per 1,000 sq. ft.	
Chinch Bugs ⁵				
Fleas (Adult)			000000	
Fleas (Larvae) ⁶			cccc	
Imported Fire Ants (Adult) ⁷			0 0000	
Imported Fire Ants (Mounds) ⁷		CCC	600	
Millipedes		C	0	
Mole Cricket (Adult) ⁸		C	0000	
Mole Cricket (Nymph) ⁹			0000	
Ticks ¹⁰		c	00 0	
Pillbugs	0.4	200 lbs.	4.6 lbs.	
Sowbugs	lbs. AI/A	per acre	per 1,000 sq. ft.	

In New York State, this product may NOT be applied to any grass or turf area within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).

711

In New York State, do make a single repeat application of Wisdom GC Granular if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Comments

¹Armyworms, Cutworms, and Sod Webworms: To ensure optimum control, irrigate the treated area with up to 0.1 inches of water immediately after application to activate (release from the granule) the insecticide.

²Annual Bluegrass Weevil (*Hyperodes*) adults: Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when *Forsythia* is in full bloom and concludes when flowering dogwood is in full bloom. Consult your State Cooperative Extension Service for more specific information regarding application timing.

³Billbugs: Applications should be made when adult billbugs are first observed during April and May. Degree day models have been developed to optimize application timing. Consult your State Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of over-wintered chinch bugs.

⁴Black Turfgrass Ataenius: Applications should be made during May and July to control the first and second generation of black turfgrass ataenius adults, respectively. The May application should be timed to coincide with the full bloom stage of Vanhoutte spiraea (Spiraea vanhouttei) and horse chestnut (Aesculus hippocastanum). The July application should be timed to coincide with the blooming of Rose of Sharon (Hibiscus syriacus).

⁵Chinch Bugs: Chinch bugs infest the base of grass plants and are often found in the thatch layer. Irrigate the treated area with up to 0.25 inches of water immediately after application to activate (release from the granule) the insecticide. Chinch bugs can be one of the most difficult pests to control in grasses and the higher application rates may be required to control populations that contain both nymphs and adults during the summer.

⁶Flea Larvae: Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Irrigate the treated area with up to 0.5 inches of water immediately after application to activate (release from the granule) the insecticide.

Imported Fire Ants: Control will be optimized by combining broadcast applications that will control foraging workers and newly mated fly-in queens with mound drenches that will eliminate existing colonies. If the soil is not moist, then it is important to irrigate before application. Broadcast treatments should apply up to 0.4 lb AI/A. Mounds should be treated by diluting 1 teaspoon of Wisdom Flowable (EPA Reg. No. 5481-519) formulation per gallon of water and applying 1 to 2 gallons of finished spray per mound. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A 4 foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65-80°F) or in early morning or late evening hours.



Note: a spray rig that is calibrated to apply 0.1 lb. AI/A (20 oz.) of <u>Wisdom Flowable</u> in 2.5 gallons per 1,000 square feet contains the approximate dilution (1 teaspoon per gallon) that is required for fire ant mound drenches in the spray tank. *Application of 0.25 lbs. AI/A of Wisdom GC Granular will provide six months residual activity for control of foraging Imported Fire Ants and newly mated Fly-in Queens. *Not applicable in California.

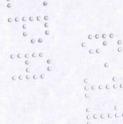
⁸Mole Cricket Adults: Achieving acceptable control of adult mole crickets is difficult because preferred grass areas are subject to continuous invasion during the early spring by this extremely active stage. Applications should be made as late in the day as possible and should be watered in with up to 0.5 inches of water immediately after treatment. If the soil is not moist, then it is important to irrigate before application to bring the mole crickets closer to the soil surface where contact with the insecticide will be maximized. Grass areas that receive pressure from adult mole crickets should be treated at peak egg hatch to ensure optimum control of subsequent nymph populations (see below).

⁹Mole Cricket nymphs: Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately prior to peak egg hatch. Optimal control is achieved at this time because young nymphs are more susceptible to insecticides and they are located near the soil surface where the insecticide is most concentrated. Control of larger, more damaging, nymphs later in the year may require both higher application rates and more frequent applications to maintain acceptable control. Applications should be made as late in the day as possible and should be watered in with up to 0.5 inches of water immediately after treatment. If the soil is not moist, then it is important to irrigate before application to bring the mole cricket closer to the surface where contact with the insecticide will be maximized.

¹⁰Ticks: Do not make spot applications. Treat the entire area where exposure to ticks may occur. Use higher application rates when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreat as necessary to maintain adequate control. Do not allow public use of treated areas during application.

Deer Ticks (*Ixodes sp.*) have a complicated life cycle that ranges over a two year period and involves four life stages. Applications should be made in mid to late spring to control larvae and nymphs that reside in the soil and leaf litter.

American dog ticks may be a considerable nuisance in suburban settings, particularly where homes are built on land that was previously field or forest. These ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control American dog tick larvae, nymphs and adults.



1

Perimeter Application: Apply to ground area 5 to 10 feet wide around and adjacent to the structure.

Aplication Rate Pounds Per 1,000 sq. ft.	Band Width	Pounds of Wisdom GC Granular for Perimeter Applications Linear Distance (Feet) Around Structure							
		100	150	200	250	300	400	500	1,000
2.3	5 feet	1.3	1.9	2.5	3.0	3.6	4.8	5.9	11.7
2.3	10 feet	3.0	4.2	5.3	6.5	7.6	9.9	12.2	23.7
3.0	5 feet	1.7	2.5	3.3	3.9	4.7	6.3	7.7	15.2
3.0	10 feet	3.9	5.4	6.9	8.5	9.9	12.9	15.9	30.9
3.5	5 feet	2.0	2.9	3.8	4.5	5.4	7.2	8.9	17.5
3.5	10 feet	4.5	6.3	8.0	9.8	11.4	14.9	18.3	35.5
4.6	5 feet	2.6	3.8	5.0	6.0	7.2	9.6	11.8	23.4
4.6	10 feet	6.0	8.4	10.6	13.0	15.2	19.8	24.4	47.4

Note: the amounts of Wisdom GC Granular listed in the above table are based on the total area being treated. This area is determined by multiplying the linear distance by the band width and then adding to that value the area of a circle whose radius is equal to the band width (to account for the area treated at the four corners of a rectangular structure).

INDUSTRIAL NON-AGRICULTURAL APPLICATIONS

(Including Industrial Sites, Parks, Ball Fields and Cemeteries)

Broadcast Spot Application: For the control of actively foraging ants (including Imported Fire Ants) broadcast uniformly 2.3 to 4.6 lbs. Wisdom GC Granular per 1,000 sq. ft. (0.2 to 0.4 lbs. AI/Acre). See comments section under Grass Applications for additional rate recommendations.

Pad Mounted Electrical Sites: To reduce or prevent ant mound building activity on electrical pads, uniformly distribute 1.0 to 1.5 Tablespoons (0.06 to 0.09 lbs.) of Wisdom GC Granular per 4 sq. ft. of mounting pad. Where existing transformers are completely or partially filled with soil excavated by resident Ants, remove any excess fill and level the remaining soil prior to application. Food utensils such as tablespoons must not be used for food purposes after use in measuring pesticides.

Note: Electrial transformers appear to be more attractive to ants during the cooler months. For best results treat in the Fall or early Spring.



Wisdom GC Granular Recommended Spreader Settings for Broadcast Applications

Equipment	Ground	Spreader Setting				
	Speed	100 pound	ls per Acre	200 Pounds per Acre		
	(MPH)	Once Over	Twice Over	Once Over	Twice Over	
Hand-Pushed						
LESCO Rotary	3	B + 1/4	A + 1/2	C + 1/2	B + 1/4	
Scotts R-8A-1 Rotary	3	G	Е	Not. Rec.	G	
Gandy Models (42, 36, 30, 24")	3	12	10.5	16	12	
Spyker (all models)	3	2.6	2	3.1	2.6	
Equipment Drawn (PTO=540 RI	PM)			halos sa hasi		
Gandy Models (42, 36, 30, 24")	4.5	14	11.5	19	14	
Gandy 6500 Series	4.5	15	11	20	15	
Gandy 10T Series	5.0	16.5	12	24	16.5	
Herd GT-77	4.0			8-H		
Herd GT-77	8.0	8-H			8-H	
Lely 2.3202.000.1	4.5	2	1	3.5	2	
Lely Model L-400	4.5	Not. Rec.	Not. Rec.	2	Not. Rec.	
Vicon PS402	4.5	10	7	16	10	
Vicon PS1002T	4.5	13	9	21	13	

Note: These recommended settings should be used as starting points when calibrating a spreader to achieve the desired application rate of Wisdom GC Granular. After Calibration, the technician should regularly observe the amount of Wisdom GC Granular that is applied to a known area and make further setting adjustments, as necessary, to maintain the appropriate application rate. Spreaders should be calibrated periodically to ensure that equipment wear or other factors have not altered the flow rate of Wisdom GC Granular. Calibration instructions are included in the Owner's Manual that was provided by the equipment manufacturer at the time of purchase.

RECOMMENDED SPREADER SETTINGS (Optional Text)

Note: Following will be a list of application spreaders and appropriate settings. This list will vary depending on the alternate carrier used. (This note will not appear on final printed label.)

Note: These spreader settings were established using standard equipment available from the spreader manufacturer at swath widths and speeds typically used within the industry. It is recommended that all spreader equipment be calibrated at the time of application to achieve the desired application time.

Resistance: Some insects are known to develop resistance to products used repeatedly for control. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. Consult your local or state pest management authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and suspect that resistance is a reasonable cause, immediately consult your local company representative or pest management advisor for the best alternative method of control for your area.

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call Amvac: 1-323-264-3910.

To confine spill: Cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container.

Paper and plastic bags: Completely empty bag into application equipment. When completely empty, offer for recycling, if available or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STREET LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT ALLOWED BY LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE FOR ANY SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

Wisdom is a registered trademark of AMVAC Chemical Corporation.

AMVAC Chemical Corporation 4100 E. Washington Boulevard Los Angeles, CA 90023 U.S.A. 1-323-264-3910