



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 20, 2012

Christopher Davis
Registration Manager
Amvac Chemical Corporation
4695 MacArthur Court, Suite 1200
Newport Beach, CA 92660

Subject: Amendment – Adding Ticks and Revising the Environmental Hazards Section
Wisdom® Lawn Granular Insecticide
EPA Reg. No. 5481-521
Your submission dated June 22, 2012

Dear Mr. Davis:

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. On the front panel replace the statement "Only for sale to, use, and storage by commercial applicators ... etc" with "For sale to, use, and storage by commercial applicators ... etc". Also replace "Inert Ingredients" with Other Ingredients" in the *Ingredients Statement* section.
2. Replace the statement "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet" in the *Precautionary Statements* section.
3. On page 5 under Broadcast Spot Applications, replace "See comments section under Lawn & Perimeter Applications for additional rate recommendations" with "See comments section under Lawn & Perimeter Applications for additional rate directions".
4. On page 7 make the following revisions:
 - a. Replace "WISDOM LAWN GRANULAR INSECTICIDE – Recommended Spreader Settings for Broadcast Applications" with "WISDOM LAWN GRANULAR INSECTICIDE – Spreader Settings for Broadcast Applications".

- b. Replace "Recommended Spreader Settings for Broadcast Applications" with "Spreader Settings for Broadcast Applications".
 - c. Replace "NOTE: These recommended setting should be used as starting points ... etc" with "NOTE: These setting should be used as starting points ... etc".
5. Replace the statement "Dealers Should Sell in Original Packages Only" with "Dealers Must Sell in Original Packages Only".

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

Sincerely,



Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

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Optional or Alternate Wording: Treats up to 5,000 sq. ft.

By Weight

INERT INGREDIENTS

99.8%

TOTAL	100.0%
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*Cis isomers 97% minimum, trans isomers 3% maximum.

CAUTION

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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

For Medical Emergencies, phone:.....1-888-681-4261

For Transportation Emergencies, including spill, leak or fire, phone: CHEMTREC.....1-800-424-9300

For Product Use Information, phone: AMVAC.....1-888-462-6822

This product is a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

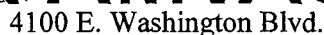
Net Contents:

As Marked on Container

ACCEPTED
with COMMENTS
In EPA Letter Dated
NOV 20 2012

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

54001-52



Los Angeles, CA 90023 U.S.A.

A 10x10 grid of letters 'C' and 'G' representing a DNA microarray. The letters are arranged in a pattern that suggests a specific sequence or structure, with some letters appearing more frequently than others.

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply when weather conditions favor drift from treated areas. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas.

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Not for use on plants being grown for sale of other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climate modification and being grown in interior plantscapes, ornamental gardens or parks, or lawns or grounds.

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; parks; recreational areas or athletic fields).

Do not broadcast apply more than 0.4 lbs. A.I. (200 lbs. WISDOM LAWN GRANULAR INSECTICIDE) per acre per year.

Apply this product directly to the lawn or garden area. Water treated area as directed on this label. Do not water to the point of run-off. Do not make applications during rain.

Not for use on golf courses, sod farms, nurseries, in commercial greenhouses or on grass grown for seed.

LAWN AND PERIMETER APPLICATIONS

LAWN APPLICATION: Broadcast WISDOM LAWN GRANULAR INSECTICIDE 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 LAWN GRANULAR INSECTICIDE may be applied at up to 0.4 lb a.i./Acre to control each of the pests listed in this Table. For residential lawn use, do not apply more than 0.2 lbs. a.i. per acre per application.

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PEST	ACTIVE INGREDIENT LBS. PER ACRE	APPLICATION RATE	
		WISDOM LAWN GRANULAR INSECTICIDE	
Armyworms ¹ Cutworms ¹ Sod Webworm ¹	0.1 lbs. a.i./A	50 lbs. per acre	1.15 lbs. per 1000 sq. ft.
Annual Bluegrass Weevil (<i>Hyperodes</i>) (Adult) ² Billbugs (Adult) ³ Black Turfgrass Ataenius (Adult) ⁴ Leafhoppers Mealybugs	0.1 – 0.2 lbs. a.i./A	50 - 100 lbs. per acre	1.15 – 2.3 lbs. per 1000 sq. ft.
European Crane Fly	0.15 – 0.3 lbs. a.i./A	75 – 150 lbs. per acre	1.75 – 3.50 lbs. per 1000 sq. ft.
Ants Centipedes Chinch Bugs ⁵ Fleas (Larvae) ⁶ Fleas (Adults) Imported Fire Ants (Adult) ⁷ Imported Fire Ants (Mounds) ⁷ Millipedes Mole Cricket (Adult) ⁸ Mole Cricket (Nymph) ⁹ Ticks ¹⁰	0.2 – 0.4 lbs. a.i./A	100 – 200 lbs. per acre	2.3 – 4.6 lbs. per 1000 sq. ft.
Pillbugs Sowbugs	0.4 lbs. a.i./A	200 lbs. per acre	4.6 lbs. per 1000 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).

In New York State, do make a single repeat application of Wisdom Lawn Granular Insecticide 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 adults: 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 applications 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.

⁷Imported 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 control 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 a.i./A. Mounds should be treated by diluting 1 teaspoon of Wisdom TC Flowable (EPA Reg. No. 5481-520) 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 four-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 a.i./A (20 ozs.) of Wisdom TC Flowable (EPA Reg. No. 5481-520) 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 125 lbs/acre of WISDOM LAWN GRANULAR INSECTICIDE 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).

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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 crickets closer to the soil surface where contact with the insecticide will be maximized.

¹⁰**Ticks:** 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.

PERIMETER APPLICATION

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

Boundary Applications: Apply to soil areas, ornamental gardens, pavement crevices, fencelines, planter areas, vegetation areas and mulch areas.

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

NOTE: The amounts of WISDOM LAWN GRANULAR INSECTICIDE 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).

FIRE ANT MOUND TREATMENT: Apply 1/2 cup of WISDOM LAWN GRANULAR INSECTICIDE per mound and then drench the mound with 1 to 2 gallons of water. The mound should be drenched with sufficient force to break its apex and allow the insecticide to flow into the ant tunnels. For best results, apply in cool weather (65 to 80° F) or in early morning or late evening hours. Treat new mounds as they appear. Food utensils such as teaspoons and measuring cups should not be used for food purposes after use with insecticide.

INDUSTRIAL NON-AGRICULTURAL APPLICATIONS

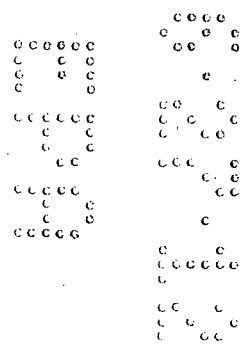
(Including Industrial Sites, Parks, Ball Fields and Cemeteries)

BROADCAST SPOT APPLICATIONS: For the control of actively foraging ants (including Imported Fire Ants) broadcast uniformly 2.3 to 4.6 lbs. WISDOM LAWN GRANULAR INSECTICIDE per 1000 sq. ft. (0.2 to 0.4 lbs. a.i./Acre). See comments section under Lawn & Perimeter Applications for additional rate recommendations.

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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 LAWN GRANULAR INSECTICIDE 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.

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



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WISDOM LAWN GRANULAR INSECTICIDE – Recommended Spreader Settings for Broadcast Applications

EQUIPMENT	GROUND SPEED (MPH)	SPREADER SETTING			
		100 POUNDS PER ACRE		200 POUNDS PER ACRE	
		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	E	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 RPM)					
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

Optional or Alternate Spreader Settings

Recommended Spreader Settings for Broadcast Applications		
Spreader Make and Model	Setting To Deliver	
	2.3 lbs. Per 1,000 sq. ft.	3.5 lbs. Per 1,000 sq. ft.
Spyker (all models)	4.7	5
Earthway Drop 7300B	16	17
Republic/Scotts Broadcast	3	4
Republic/Scotts Drop	6	7
Precision Drop FH-22D	9	10
Precision Broadcast/Red Devil	12	13
Scott Speedy Green	3	4.5
Broadcast/Earthway 2850	14	15
Broadcast/Earthway 2800A	14	15
Broadcast/Earthway 2050 S.U.	14	15

NOTE: These recommended settings should be used as starting points when calibrating a spreader to achieve the desired application rate of WISDOM LAWN GRANULAR INSECTICIDE.

After calibration, the technician should regularly observe the amount of WISDOM LAWN GRANULAR INSECTICIDE 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

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factors have not altered the flow rate of WISDOM LAWN GRANULAR INSECTICIDE. Calibration instructions are included in the Owner's Manual that was provided by the equipment manufacturer at the time of purchase.

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.

Dealers Should Sell in Original Packages Only.

STORAGE AND DISPOSAL

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 close tightly.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call Chemtrec 1-800-424-9300.

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. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW 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.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW 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, STRICT 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 CONSISTENT WITH APPLICABLE LAW MANUFACTURER OR SELLER SHALL NOT BE LIABLE FOR SPECIAL,

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Wisdom is a trademark of AMVAC Chemical Corporation.

4100 E. Washington Boulevard

1-888-462-6822 * www.amvac-chemical.com

A 10x10 grid of circles. The circles are arranged in a pattern that suggests a sparse distribution of 'C's across the grid. The circles are arranged in a pattern that suggests a sparse distribution of 'C's across the grid.