



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

May 10, 2004

Kathie Tryson
Sylorr Plant Corp.
P.O. Box 142642
St. Louis, MO 63114-0642

Subject: Label Amendment - Adding Optional Marketing Statements
Permethrin 0.5 Lawn Insect Control with Fertilzer
EPA Reg. No. 8660-254
Your Submission Dated October 28, 2003

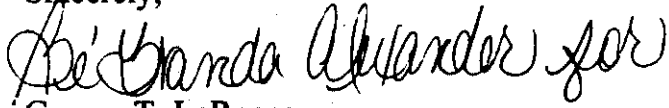
Dear Ms. Tryson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, 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 as follows:
 - a. Replace "Wash thoroughly with soap and water after handling" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."
 - b. Add "Remove and wash contaminated clothing before reuse."

Note, base on the inhalation acute toxicity of the product (Tox Category IV), you are not required to have an inhalation first aid statement. You may delete this statement if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

PERMETHRIN 0.5 LAWN INSECT CONTROL WITH FERTILIZER

OPTIONAL MARKETING CLAIMS

[For Outdoor Use on Home Lawns • Kills Listed Insects in Lawn • Lawn Insect Control • Treats [Covers] up To 2,500; 5,000; 10,000; 15,000 Sq.Ft. • Controls Home Invading Pests • 10 pounds treats [covers] 5,000 Sq.Ft. • Controls Surface and Foliage Feeding Pests • For use on All Grass Varieties and Dichondra Lawns • Contains Permethrin • Ready To Use • Kills [Controls]: Ants, Armyworms (inc. Fall, Yellow-striped, etc.) Bear Ticks, Bermudagrass mites, Billbugs (adult), Black Legged Ticks, Boxelder Bugs, Brown Dog Ticks, Centipedes, Chiggers, Chinch Bugs, Clover mites, Cutworms, Darkling Ground Beetles, Deer Ticks (*Ixodes dammini*), Digger wasps, European Crane Fly Larvae, Field Crickets, Fire Ants, Fleas, Grasshoppers, Hyperodes (Turfgrass Weevil), Lawn Moths, Leafhoppers, Lone Start Ticks, Scorpions, Sod Webworms, Sowbugs, Spiders (including Black Widow), Spittlebugs, Springtails, Ticks, Western Black Legged Ticks (*Ixodes pacificus*) • Also Kills Sod webworms, Fire Ants, Digger Wasps and other destructive insects as listed for up to 6 weeks • Provides Contact and Residual Control For up to 6 Weeks • Kills On Contact • Keeps Killing up to 6 weeks • Kills these bugs (graphic of each bug) and many others listed • Kills [Controls] [over 35] Lawn Insects • Kills [Controls] Lawn Insects [& Feeds Your Lawn] • Kills Lawn Damaging and Nuisance Insects including Ants, Armyworms, Fire Ants, Fleas, Ticks, Sod Webworms and Spiders • Kills over 35 insects including Ants, Fleas, Ticks, Sod Webworms, Chinch Bugs and many other Nuisance and Lawn Damaging Insects For Up to 6 Weeks. • Apply When Insects First Appear]

Optional Fertilizer claims:

[* [Contains Polyon®] Timed Release [Nitrogen] for Extended Feeding [Greening]. • Thick Green Growth Without The Burn • Feeds Up to ___ Months]

Active Ingredient:

Permethrin	0.5%
[*] Other Ingredients	99.5%
TOTAL	100.0%

[* Other ingredients in this product are fertilizer and clay as the carrier of the insecticide.]

KEEP OUT OF REACH OF CHILDREN

CAUTION See additional precautionary statements on back of bag.

NET WT. 5, 10, 20 LBS (2.2 KG, 4.5 KG, 9.0 KG)

[OPTIONAL USE TIP BOX]

"To Do" List

- Measure lawn
- Subtract Non-Lawn Areas
- Apply at recommended rate
- Water in as indicated.

Guaranteed Analysis

Total Nitrogen (N)	x.x%
x.x% Ammoniacal Nitrogen	
x.x% Urea Nitrogen*	
Available Phosphate (P ₂ O ₅)	x.x%
Soluble Potash (K ₂ O)	x.x%

Derived From: Urea, Diammonium Phosphate and Muriate of Potash

ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 MAY 10 2004
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
 8660-254

[*CTR™, Composite Timed Release is your Guarantee that a QUICK and LONG LASTING FEEDING will be systematically delivered to your lawn.]

*CTR is the name for the coated urea in this product.

STOP. READ ENTIRE LABEL BEFORE USE. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For outdoor use around the home only.

This product is recommended for the control of lawn insects, fleas and ticks in outdoor residential areas.

- Lawn treatments can be made to ornamental and turfgrass areas and under shrubbery with a fertilizer spreader.
- Spot treatments can be made to ant mounds and digger wasp nests.

Important: It is best to use all of the product in accordance with label directions.

GENERAL USE DIRECTIONS

1. Determine size of area to be treated -- measure length and width in feet, then multiply to determine coverage area in sq.ft.
2. Use the spreader setting chart to determine appropriate setting.
3. Treat as directed -- thorough coverage is important. Water in as indicated on the label.
4. Keep children and pets off treated areas until this material is washed into turf and grass is dry.
5. Do not use food utensils such as spoons or measuring cups for food purposes after use in measuring pesticides.

LAWN TREATMENT FOR GRASS AND DICHONDRA LAWNS

To control:

Ants	Armyworms (inc. Fall, Yellow-striped, etc)	Bermudagrass mites
Billbugs (adult)	Boxelder Bugs	Centipedes
Chiggers	Chinch Bugs	Clover mites
Cutworms	Darkling Ground Beetles	Digger wasps
European Crane Fly Larvae	Field Crickets	Grasshoppers
Hyperodes (Turfgrass Weevil)	Lawn Moth	Leafhopper
Scorpions	Sod Webworms	Sowbugs
Spiders (inc. Black Widow)	Spittlebugs	Springtails

- Apply this product uniformly to home lawns, under shrubbery, and other ornamental or recreational turfgrass areas.
- Apply when insects first appear using granules at the rate of 2 pounds per 1,000 sq. ft.
- For thicker lawns (such as St. Augustine grass) apply at a rate of 3 pounds per 1,000 sq. ft.
- Always use a fertilizer spreader.
- See spreader setting chart below.
- Immediately after application, water the lawn with ¼ to ½ inches of water after application.
- If necessary reapply in 4 to 6 weeks.

European Crane Fly Larvae (Leatherjackets) – the best time to apply is in May or June when the insects are young.

Chinch Bugs – Begin application when temperatures reach 80°F or above. A

second application may be necessary in 6 weeks if insect activity continues.

Flea And Tick Control (In Lawns) - In summer months, fleas and ticks frequently thrive in lawns and outdoor pet resting areas around the home.

FLEAS AND TICKS (including but not limited)

Bear Ticks	Black-legged Ticks	Brown Dog Ticks
Deer Ticks (<i>Ixodes dammini</i>)	Lone Star Ticks	Western Black-legged Ticks
Wood Ticks		

For best control a regular treatment program should be followed.

- Apply when pests first appear in late spring (May-June)
- Then apply every 3 months until late summer (September – October)
- Apply at the of 2 lbs. per 1,000 sq. ft.
- Fall temperatures below 50°F decrease pest activity. Eliminating weeds around the home and mowing lawns frequently reduces the hiding places for these pests.

Note: For optimal results treat dogs, cats, their kennel or bedding area with appropriately labeled products to achieve satisfactory control. If pets and the outdoor and indoor areas they frequent are not treated, pests will continue to infest the entire premises.

SPOT TREATMENT

OUTDOOR ANT MOUNDS

This product may be used outdoors for the control of ants including:

Big Headed, Cornfield, Field, Harvester, Little Black, Pavement, and Pyramid Ants.

It is best to locate the mound and treat it first. Mounds will usually be found in the ground but may be concealed under stones, boards and slabs, in stumps or in logs.

- Apply 1 to 2 teaspoons of product to thoroughly cover the mound.
- Sprinkle lightly with water.

DIGGER WASPS

Apply 1 to 2 teaspoons of product in and around each individual ground nest opening. Make the application at dusk when the wasps are not active.

IMPORTED FIRE ANTS

For small to medium size mounds apply ½ to 1 cup over and 2 feet around each fire ant mound. For medium to large size mounds apply 1 to 1 ½ cups over and 2 feet around each fire ant mound. Immediately after application, water the granules into the soil gently with a light sprinkling to avoid disturbing the colony.

For a small to medium size mound use at least ½ gallon of water per mound, but not more than 1 gallon. For a medium to large size mound use at least 1 gallon of water per mound, but not more than 2 gallons.

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Note: Use of high pressure watering equipment may disturb the colony and cause migration of the ants, thus reducing the effectiveness of the treatment. Apply in cool weather (65-80° F) or in early morning or late evening for best results. Apply to new mounds as they appear.

SPREADER SETTINGS

ROTARY SPREADERS	2# PER 1,000 SQ.FT.	3# PER 1,000 SQ.FT
Ev-N-Spread		
Ortho		
Quaker		
Scotts Easy Green		
Scotts Speedy Green		
True Temper		
DROP SPREADERS		
Ortho		
Precision		
Scotts (PF)		
Scotts Even Green		

HOW TO APPLY

1. Calibrate your spreader according to the spreader manufacturer's directions. Adjust settings as needed to apply the recommended product.
2. Using a drop-type or rotary spreader, apply granules evening over grass, avoiding streaking, skips or overlaps. Avoid using spreaders that apply product in narrow or concentrated bands.
3. Check calibration of spreader frequently to ensure spreader is functioning properly and applying product evenly.

IMPORTANT

It is important to follow directions as indicated on this quality lawn care product as over application may cause injury to your lawn. Spreader settings are approximate. Differences may occur due to condition of spreader, speed at which applied, and roughness of area treated. Be sure to check spreader before beginning, adjusting if necessary. **NEVER APPLY BY HAND.**

Optional Spreader Tip:

[To avoid gaps and streaks, first spread border of lawn and then fill in center with uniform, parallel passes. Walk at a steady pace so as to apply evenly throughout the lawn. 9Graphic of pattern]]

STORAGE AND DISPOSAL

Storage: Store product in original container in a cool, dry, locked place out of reach of children and pets.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP

for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

- Harmful if swallowed
- Harmful if absorbed through skin
- Avoid contact with skin, eyes or clothing
- Causes moderate eye irritation
- Wash thoroughly with soap and water after handling

FIRST AID

The table below describes the first aid procedures for incidents involving Permethrin 0.5% Lawn Insect Control with Fertilizer

<i>In the case of accidental...</i>	<i>Immediately....</i>
Contact with skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes • Call a Poison Control Center or doctor for further treatment advice
Swallowing	<ul style="list-style-type: none"> • Call 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 the Poison Control Center or doctor • Do not give anything by mouth to an unconscious person
Inhalation	<ul style="list-style-type: none"> • 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 • Call a Poison Control Center or doctor for treatment advice
Contact with Eyes	<ul style="list-style-type: none"> • 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 eye. • Call a Poison Control Center or doctor for treatment advice.

Note: Have this product container or label with you when calling a Poison Control Center or doctor, or going for treatment. Active Ingredient: Permethrin, CAS #52645-53-1.

ENVIRONMENTAL HAZARDS

- This product is extremely toxic to fish.
- Do not apply directly to water.
- Drifts and runoff from treated areas may be hazardous to aquatic organisms in treated areas.
- Do not contaminate water when disposing of equipment washwaters.

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials. Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-sb.com>.

Visit us on the internet at www.vigoro.com or call our Customer Satisfaction Hotline at 1-800-561-1333.

*CTR™ is a trademark of United Industries, Inc. and is the name for the coated Urea in this product.

If you apply Permethrin 0.5 Lawn Insect Control with Fertilizer as directed and are not completely satisfied, send proof of purchase from this package and the original cash register receipt to the address below. We will refund the purchase price.

Made in the USA for Sylorr Plant Corp., PO Box 142642, St. Louis, MO 63114-0642

EPA Reg. No. 8660-254

EPA Est. No. 9688-MO-1

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[Optional Marketing Statements (for Supplemental Distributor):

- 25% Nitrogen provides leaf growth and makes the grass green; 3% Phosphate Promotes root development and 3% Potash Helps plants resist drought and disease.

- 4 Stage Lawn Care Program.

- (Subregistrant) 4 Stage Lawn Program makes it easier to have a lush, green lawn. Our 4 simple applications eliminate the guesswork and give you professional lawn care results. Each stage combines just the right amount of fertilizer with the right amount of control and prevention. Just match each stage to the correct season and you'll prevent crabgrass, control weeds and insects and prepare your lawn for the winter. It's what your lawn needs for strong growth.

- Added Headings

QUALITY RESULTS; USE INSTRUCTIONS;

SUGGESTED SPREADER SETTINGS;

CARE & HANDLING; FERTILIZER.

- (Subregistrant) Guarantees Satisfaction if for any reason you are not fully satisfied with the performance of this product, we want you to know, just bring the item back to the store and we will exchange it or issue a refund.]

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