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

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 23, 2011

Debbie Ziehr The Andersons Lawn Fertilizer Division, Inc. P.O. Box 119 Maumee, OH 43537

Subject: Amendment: Response to Agency's March 31, 2011 Letter The Andersons Fertilizer with 0.039% Bifenthrin Insecticide EPA Reg. No. 9198-217 Your Submission Dated April 18, 2011

Dear Ms. Ziehr:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

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

Sincerely. a algander for

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

Enclosure

Front Panel

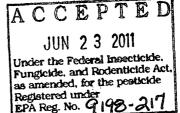
The Andersons Fertilizer with 0.039% Bifenthrin Insecticide

This product is a unique combination of insecticide and fertilizer to control damaging insects while replenishing your lawn with essential nutrients. It is designed to control the listed insects on residential lawns.

For homeowner use only.

Optional:

For lawns Soil & Turf Insect Control Plus Fertilizer Spring/summer application Control listed bugs while fertilizer your lawn.



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Controls the following ants, armyworms, billbugs (adult), ticks, chiggers, chinch bugs, crickets, fleas, millipedes, mole crickets, sod webworms (lawn moths) & others as listed on label

Provides your lawn with controlled-release nitrogen for extended feeding

Apply with a broadcast or drop spreader

Green Thumb quality pledge

Kills listed 40 lawn insects including: ants, armyworms, chiggers, ticks, chinch bugs, crickets, fleas and sod webworms.

Feeds and Strengthens lawn again heat and drought

XX % Iron for Deep Greening

Kills listed lawn insects including: ants, armyworms, chiggers, ticks, chinch bugs, crickets, fleas and sod webworms.

Active Ingredients

Bifenth	nrin *	0.039%
Other Ingredie	ents	<u>99.961%</u>
Total	· ·	100.000%

Cis isomers 97% minimum, trans isomers 3% maximum US Patent No. 4,238,505

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Weight XX.XX lbs. (XX.XX kg) Covers XXXX Sq. Ft.

EPA Reg. No. 9198-217 EPA Est. 9198-OH-1<u>M</u>, 9198-OH-2<u>B</u>, 9198-AL-001<u>A</u>, 9198-PA-001<u>P</u> Underlined letter is first letter used in run code on bag

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The Andersons Fertilizer with 0.039% Bifenthrin Insecticide

Guaranteed Analysis

Total Nitrogen (N)	XX%
Available Phosphate (P205)	XX%
Soluble Potash (K ₂ 0)	
Plant nutrients derived from:	

For products being sold into states with metals regulations: Information regarding the contents and levels of metals in this product is available on the internet at http://www.regulatory-info-ap.com./

For products being sold into Kentucky that do not provide at least 1 lb. of nitrogen per application (mandatory fertilizer statement):

A lawn will typically utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing X pounds of nitrogen at the X lbs. per 1,000 square feet product application rate. Please consult with our local extension office for questions regarding a regular fertilizer program.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating drinking, chewing gum, using tobacco or using the toilet.

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.

FIRST AID	
If swallowed	Call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If in eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contacts, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
lfcn 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.
ifinhaled	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.
	uct container or label with you when calling a poison control center or doctor or going You may also contact 1-800-757-8951 for emergency medical treatment information.
	ian: This product is a pyrethroid. If large amounts have been ingested, milk cream stible fats and oils may increase absorption and so should be avoided.

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READ ALL DIRECTIONS PRIOR TO APPLICATION OF THE PRODUCT

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 turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Not to be used on golf courses, sod farms, commercial greenhouses, nurseries, or grass grown for seed.

In New York State, this product may not be applied to turf within 100 feet of a coastal marsh or of a water body, lake, pond, river, stream, wetland or drainage ditch. In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Apply this products 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.

If product is watered in after application, do not allow children or pets to enter the area until dry.

Pest	÷ .	Use Rate per 1,000 sq. ft.
Chiggers Chinch bugs Sod Webworms (Lawn Moth)		3 pounds
Annual Bluegrass Weevil (Hyperodes) (Adult) Armyworms Bilibugs (Adult) Black Turfgrass Ataenius (Adult) Centipedes Crickets Leafhoppers	Mealybugs Millipedes Pavement Ants Pillbugs Red Ants Sowbugs Weevils	3 to 6 pounds
Ants Fire Ants Fleas Imported Fire Ants Mole Crickets Ticks		6 pounds

This product can be used to control the following lawn insects:

Treat when insects first appear. Apply this product evenly over the turfgrass area at the use rate indicated in the above table, using a properly calibrated drop or rotary spreader. A more uniform application may be achieved by spreading half of the required amount of product over the area and then applying the remaining half in swaths at a right angle to the first. Best results will occur if the treated area is thoroughly irrigated with water immediately after application.

Comments:

Armyworms, Cutworms, and Sod Webworms: For best results, the treated area should be irrigated immediately after application with up to 0.1 inches of water to activate the insecticide.

Annual Bluegrass Weevil: Treatment should be made to control the adult weevils as they migrate from their overwintering sites and move into grass areas. Contact your State Cooperative Extension Service for more specific information.

Billbugs: Apply when adult billbugs are first observed during April and May. Consult your State Cooperative Extension Service for information on degree days and timing in your region.

Black Turfgrass Ataenius: Apply treatments during May and July to control both generations of adults. The May application should be made at the same time as the full bloom stage of Vanhoutte spiraea and the Horse chestnut. The July application should coincide with the blooming of Rose of Sharon.

Chinch Bugs: These bugs infest the base of the plant and are usually found in the thatch layer. Watering the treated area with up to 0.25 inches immediately after application will result in quicker control.

Flea Larvae: These larvae develop in the soil and shady areas. Irrigate the treated area with up to 0.5 inches of water immediately after application.

Imported Fire Ants: The best control will be reached by a combination of broadcast applications and mound drenching. When mound drenching, a product such as The Andersons 0.058% Granular Bifenthrin Insecticide must be used. Irrigation should be performed prior to application if the soil is not moist. For best results, apply in cool weather. The early morning or late evening hours should suffice.

Mole Cricket Adults: These adults can be difficult to control because of their extremely active stage in the early spring. Applications should be made as late in the day as possible and be watered up to 0.5 inches immediately after treatment. If the soil is not moist prior to application, it should be irrigated to ensure best control.

Mole Cricket Nymphs: Optimum control can be reached by treating young nymphs because they are more susceptible to the insecticide. Irrigate soil if it is not moist before application. Treatment should be made as late in the day as possible. Water the treated area with up to 0.5 inches directly after application.

Ticks: Do not make spot applications. Treat the entire area where ticks may occur. The higher application rate might be needed if heavy leaf litter or dense ground cover exists.

Deer Ticks: These ticks have a life cycle that ranges over a two year period and involves four life stages. Treatments should be applied in mid- to late-spring to control larvae and nymphs that are present on the soil.

American Dog Ticks: These ticks tend to gather along paths or roadways where humans are likely to be found.

SPREADER DIRECTIONS

Broadcast spreaders: For best results, apply in a circular path starting on the outside and working to the center. A little overlap of product will ensure complete coverage.

Drop Spreaders: First, apply 2 border strips along the edge of each end of the lawn. Then apply product along the length of the lawn, overlapping slightly and shutting off the spreader before turning as you reach the edge of the border strips.

Important: It is important to follow the directions as indicated on this quality lawn care product as over-application may cause injury to the lawn. Measure the size of the area to be treated and do not over or under apply. Spreader settings are approximate. Differences may occur due to

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condition of spreader, speed at which applied, and roughness of area treated. Calibrate spreader prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing uniformly. Close spreader when filling, stopping or turning. Do not hand spread.

Note: following will be a list of application spreaders and appropriate settings. This list will vary dependent on market of spreaders. (this note will not appear on final printed label).

Spreader	3 lbs./1,000 sq. ft.	6 lbs./1,000 sq. ft.
aa	XX	XX
bb	XX	XX
СС	XX	XX

STORAGE AND DISPOSAL

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

STORAGE: Keep out of reach of children and animals. Store in original container only. Store in cool, dry place and avoid excess heat.

DISPOSAL:

If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If party filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

IMPORTANT: READ BEFORE USE:

Read the entire Directions for Use and the Warranty Disclaimer and Limitation of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or Buyer accepts the following Warranty Disclaimer and Limitation of Liability:

WARRANTY DISCLAIMER and LIMITATION of LIABILITY:

Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. Manufacturer makes NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. To the extent consistent with applicable law, it is Manufacturer's intent to LIMIT ANY LIABILITY FOR SPECIAL, CONSEQUENTIAL OR INCIDENTAL ECONOMIC DAMAGES to refund of purchase price or replacement of product, at Buyer's choice. To the extent consistent with applicable law, Manufacturer DISCLAIMS ANY LIABILITY FOR COMPENSATORY OR OTHER DAMAGES ARISING OUT OF ANY USE CONTRARY TO LABEL DIRECTIONS. Use contrary to label directions is not permitted.

LEGAL RIGHTS:

THIS LIMITED WARRANTY GIVES YOU SPECIFIC LEGAL RIGHTS; YOU MAY HAVE OTHER RIGHTS THAT VARY FROM STATE/JURISDICTION TO STATE/JURISDICTION.

Manufactured by: The Andersons Lawn Fertilizer Division d/b/a Free Flow Fertilizer PO Box 119 Maumee, OH 43537

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Optional marketing information: (see next page)

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 4/12/11

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 Label Changes
 EPA Amendment - Comment Letter

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 9198-217

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