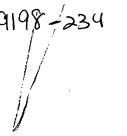
9/29/2009





# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Attn: Debbie Ziehr The Andersons Inc. P.O. Box 119 Maumee, Ohio 43537

SEP 2 9 2009

Subject:

Agency March 25, 2009 Letter/Carbaryl Reregistration

The Andersons BiCarb Lawn Insect Killer Granules

EPA Reg. No. 9198-234

Your Application Dated May 5, 2009

Dear Ms. Ziehr;

The label referred to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy is enclosed for your records. Within 45 days from the date of this letter, two copies of a final printed label must be submitted with the following changes:

- 1. On page 1, delete "Fast Acting".
- 2. On page 1, revise "Kills surface and foliage feeding pests", to read "Kills listed surface and foliage feeding pests."
- 3. On page 2, delete "Intended for homeowner use."
- 4. On page 4, delete the heading Regional Timing for Comprehensive Pest Kill and all text beneath it."
- 5. On page 4, revise "Subsurface pests: For best kill, apply 10 days to 2 weeks after egg-laying. To kill pests apply when damage is first noted. Look around your yard to determine the best time for application." to read "To effectively kill subsurface pests, apply when the insects are actively feeding near the soil surface. Contact local agricultural agents for timing of application in your area."
- 6. On page 5, delete the sentence "Repeat treatments (up to 3 per year) as necessary to kill new infestations."

Approval of this label does not constitute approval of your application for reregistration of this product. Product reregistration is currently pending for the other active ingredient, bifenthrin, in your formulation, Therefore, future labeling changes and/or additional data may be required.

If you have questions, email me at <a href="mailto:edwards.joanne@epa.gov">edwards.joanne@epa.gov</a> or by telephone at (703) 305-6736.

Sincerely yours,

Joanne S. Edwards Insecticide-Rodenticide Branch Registration Division (7504P)

## The Andersons BiCarb Lawn Insect Killer Granules

Kills listed pests on residential lawns, in and around flower beds, ornamental plantings and around the outside of homes. Intended for residential use.

#### Optional front panel claims:

- Fast Acting!
- Ready-to-use
- Kills ants, fleas, ticks, cutworms, chinch bugs, mole crickets & other listed pests
- Broad spectrum combination insecticide
- Also kills larvae of sod webworms, armyworms & cutworms
- · For use on lawns around house foundation
- Kills listed home invading pests
- Kills surface and foliage feeding pests
- Effective for kill of white grubs
- Effective kill of southern chinch bugs
- Kills ants, fleas, ticks, cutworms, chinch bugs and other listed pests

- · Use on Lawn, Ornamentals and around the outside of homes
- · Easy-To-Use Granules
- · Ready-to-Spread Granules
- · Ant, Flea, & Tick Killer
- For Use Outdoors on Lawns, Ornamental Gardens and around the outside of homes & other listed use sites
- · Kills ants, fleas, & other listed insects
- · Kills cutworms, and other listed insects
- · Kills listed insects
- · Easy to use
- · Kills ants, fleas
- . Kills Adult Mole Crickets
- · Satisfaction Guaranteed or your money back

#### **Active Ingredients**

| BifenthrinŦ *Carbaryl ŦŦ                           |          |
|--|----------|
| Other Ingredients                                  | 97.642%  |
| Total  | 100.000% |
| *Cis isomers 97% minimum, trans isomers 3% maximum |          |
| <del>T</del> CAS No. 82657-04-6                    |          |
| FFCAS No. 63-25-2                                  |          |

#### KEEP OUT OF REACH OF CHILDREN

### CAUTION

#### SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Weight XX lbs. (XX kg) Covers Up To XX, XXX Sq. Ft.

EPA Reg. No. 9198-234 EPA Est. 9198-OH-1M, 9198-OH-2B, 9198-AL-001A Underlined letter is first letter used in run code on bag

ACCEPTED With COMMENTS In EPA Letter Pated: 29,2009

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

9198-234

The Andersons BiCarb Lawn Insect Killer Granules

Net Weight XX lbs. (XX kg) Covers XX,XXX Sq. Ft.

#### **FIRST AID**

Carbaryl is an N-Methyl Carbamate Insecticide.

**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 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.

**If in eyes**: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contacts lenses, if present, after the first 5 minutes, then continue rinsing eye. 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. You may also contact 1-800-757-8951 for emergency medical treatment information. **ANTIDOTE STATEMENT:** ATROPINE SULFATE IS HIGHLY EFFECTIVE AS AN ANTIDOTE. See NOTE TO PHYSICIAN.

#### Note to Physician:

Carbaryl is an N-methyl carbamate that inhibits cholinesterase. Atropine is antidotal. Atropine is antidotal. Do not use 2-PAM (pyridene-2-aldoxime methiodide), opiates or cholinesterase inhibiting drugs. Probable mucosal damage may contraindicate the use of gastric lavage.

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt and long pants, and shoes plus socks and chemical-resistant gloves (HOUSEHOLD OR LATEX RUBBER GLOVES) WHEN HANDLING THIS PRODUCT. REMOVE CLOTHING IMMEDIATELY if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash hands before eating, drinking, chewing gum, tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

#### **ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic invertebrates. Do not apply directly to water or allow drift to water. 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.

## 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.

#### Restrictions

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Intended for homeowner use.

Do not make for than 3 applications per year for ornamentals. The minimum retreatment interval is seven days.

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Watering in is required immediately after application to lawns.

Do not apply more than 4 applications per year to lawns. The minimum retreatment period is seven days.

For the kill of ticks, the maximum allowable application rate is 1.15 lb of product per 1000 sq. ft.

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.

Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. This product may be applied only by broadcast or drop type spreaders. Do not apply by hand, spoon or belly grinder. For outdoor use only.

#### Information

This product kills listed pests on residential lawns, in and around flower beds, ornamental plantings and around the outside of homes.

#### **How to Apply**

Apply uniformly over the treatment area with either a broadcast or drop type spreader. Apply only the specified amount in the following table. Calibrate the spreader before use and check periodically to ensure the equipment is working properly. Avoid overlaps that will increase rates above those specified. Do not over or under apply. Failure to follow the Directions for Use and all precautions may result in poor pest kill.

Product must be watered in immediately after application to lawns.

Broadcast spreaders: Apply in a circular path starting on the outside and working toward the center.

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, 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. 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 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 over or under apply. Fill spreader over a hard surface. Promptly clean-up any spills.

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 | 1.5 lbs./1,000 sq. ft. | 2.0 lbs./1,000 sq. ft. | 4.0 lbs./1,000 sq. ft. | 8.0 lbs./1,000 sq. ft |
|----------|------------------------|------------------------|------------------------|-----------------------|
| aa       | XX                     | XX                     | XX                     | XX                    |
| bb ,     | XX                     | XX                     | XX                     | XX                    |
| CC ,     | XX                     | XX                     | XX                     | XX                    |

Recent research has shown that well-maintained turf is an effective environmental buffer that prevents pollutants from entering our natural water bodies. To help protect these natural resources, do not apply product to sidewalks, driveways, roadways, and other impervious surfaces which are adjacent to storm drains. Use water setting on "hydro spreader" to rinse any misplaced product back onto the area you are treating immediately after application, since storm drains often empty directly to nearby waterways.

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#### When to Apply

Due to pest activity differences, consult your local cooperative extension service for guidance on timing of application. To find your local extension agent, visit www.csrees.usda.gov.

#### Regional Timing for Comprehensive Pest Kill;

**Northeast and Midwestern states** (bounded by the Dakotas, Nebraska, Kansas, Missouri, Kentucky West Virginia and Maryland), apply mid-April to mid-May (early May for Chafers, see chart) for surface pests and over wintered grubs before they pupate, then in late July through late August for newly hatched grubs and other late season pests.

**Southern States** (bounded by New Mexico, Oklahoma, Arkansas, Tennessee and Virginia), apply in April and July, using the higher rates (when a range is indicated) for best results. Additional applications (up to the maximum allowed per year) may be required where pest activity persists year-round.

**Western States** (bounded by Montana, Wyoming, Colorado and Arizona), apply in May and July. Applications in October through warm spells in winter and/or spring may be needed to kill European Crane Fly in the PNW, (up to the maximum number allowed per year)

Surface pests: Treat when pests or damage first appear.

**Subsurface pests**: For best kill, apply 10 days to 2 weeks after egg-laying activity. To kill pests apply when damage is first noted. Look around your yard to determine best time of application.

#### How Much to Apply

| Pest   | Pounds of Product per 1,000 sq ft. | Comments   |
|--|------------------------------------|--|
| Ants (except harvester, pharaoh and carpenter ants), Armyworms, Centipedes, Chiggers, Chinch Bugs, Cutworms, Earwigs, Essex Skipper, European Chafer, Fall Armyworm, Fiery Skipper, Grasshoppers, Green June Beetle Larvae, Leafhoppers, Lucerene Moth, Millipedes, Mosquitoes (young), Scarab Beetle Adults: such as May Beetle, June Beetle, Japanese Beetle, Green June Beetle, Sod | 2.25                               | Product must be watered in immediately following application.  For heavy infestations of Chinch bugs, increase rate to 5 lbs. per 1,000 sq. ft. and treat the entire area. |
| Webworm (lawn moths), Sowbugs, Spittlebugs, Springtails, Yellowstriped Armyworms   |                                    | To effectively kill subsurface pests, apply  |
| Billbug Larvae, European Crane Fly Larvae, Fleas, White Grubs: Such as Japanese Beetle Larvae, Chafer Beetle Larvae, Phyllophaga spp. Larvae, Annual White Grubs, Black Turfgrass Ataenius Beetle Larvae, Hyperodoes Weevil (Bluegrass Weevil Larvae)  | 9                                  | when insects are actively feeding near the soil surface, usually during late March through May, or July through early September, or as guided by local                     |
| Scorpions  | 5                                  | agricultural extension   |
| Fleas  | 7-9                                | service agents.  |
| Ticks  | 1.15                               |  |

Will only kill pests present at the time of application. Pest must be directly contacted in order to be effective.

## PEST KILL IN AND AROUND FLOWER BEDS AND ORNAMENTAL PLANTINGS AND AROUND OUTSIDE OF HOMES

Kills Ants (except harvester, pharaoh and carpenter ants), Armyworms, Centipedes, Crickets, Cutworms, Earwigs, Firebrats, Silverfish, Fleas, Millipedes, Sowbugs: Apply granules uniformly in a 6 foot band around the building at the rate of 2-4 lbs. per 1,000 square feet to shrub and flower beds, foundations, ornamental plantings, and lawn or soil areas immediately adjacent to the building. Treated area must be watered in immediately after application. Repeat treatments as needed up to 3 times per year, but no more than once

every seven days. Repeat treatments (up to 3 per year) as necessary to kill new infestations. Will only kill pests present at the time of application. Contact as many pests as possible.

#### STORAGE AND DISPOSAL

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

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

#### **CONTAINER DISPOSAL:**

If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

#### **PESTICIDE DISPOSAL**

If partly 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, Inc. d/b/a Free Flow Fertilizer PO Box 119 Maumee, OH 43537

#### Optional:

Pledge of Satisfaction: We have made every effort in the formulation of this product to insure that you will be satisfied with the results. If, for any reason, you are not satisfied, please write and describe the problem. Our lawn and turf specialists will make every effort to assure your success.

Sign up to receive timely lawn & garden tips {website address}

| Date Printed  | 9-11-09                       | · · · · · · · · · · · · · · · · · · · |
|---------------|-------------------------------|---------------------------------------|
| Date Approved | 3-11-09                       |                                       |
| Supersedes    | New                           |                                       |
| Label Changes | Amendment - RED label changes |                                       |
| Filename      | 9198-234                      |                                       |
| Label code    | RVamd09-11-09                 |                                       |

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