9198-235 11/25/2011 1 of 12

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Debbie Ziehr
The Andersons Lawn Fertilizer Division, Inc.
d/b/a Free Flow Fertilizer
P.O. Box 119
Maumee, OH 43537

JAN 2 5 2011

Dear Ms. Ziehr:

Subject: Application for Pesticide Notification (PRN 98-10)
Comply with Agency pyrethroid labeling letter dated June 4, 2009
The Andersons BiCarb Insecticide + Fertilizer
EPA Reg. No. 9198-235
Your submission dated May 10, 2010

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated May 10, 2010 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions regarding this letter, please contact Dana Pilitt, PhD of my staff at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov .

Sincerely,

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
9198-235	LaRocca	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
The Andersons BiCarb Insecticide & Fertilizer	13	

5. Name and Address of Applicant *(Include ZIP Code)*
The Andersons Lawn Fert. Div. Inc.
d/b/a Free Flow Fert.
PO Box 119
Maumee, OH 43537
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [x] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification of label change per June 4, 2009, letter from Environmental Protection Agency.

This notification is consistent with the guidance in the June 4, 2009 letter and the requirements of EPA's regulations at 40 CFR part 156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR part 156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
** Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ] On label

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Debbie Ziehr	Regulatory Administrator	419-891-6671

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)
RECEIVED ON JUN 16 2010

2. Signature	3. Title	4. Typed Name	5. Date
Debbie Ziehr	Regulatory Administrator	Debbie Ziehr	5/10/10

The Andersons, Inc.
P.O. Box 119 • Maumee, Ohio 43537 • 419/893/5050

June 4, 2010

20

Document Processing Desk (NOTIF - PYRETHROID)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

included:
9198-156
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RE: Environmental Hazard and General Labeling for Pyrethroid Non-Agricultural Outdoor Products Notification

In response to the above referenced notification that we received, enclosed please find our amended labels for the products listed in Attachment 1. Please note that for EPA #9198-164, we cancelled this EPA registration back in January, 2010. For this reason, this label has not been amended.

Should you have any additional questions, please do not hesitate to contact me.

Sincerely,

The Andersons Lawn Fertilizer Div., Inc.

Debbie Ziehr

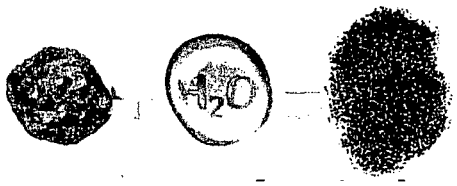
Debbie Ziehr
Regulatory Administrator
Phone #419-891-6671
Fax #419-891-2745
Email: debbie_ziehr@andersonsinc.com

Enclosures.

Front Panel *(for internal use only, will not appear on final label)*

The Andersons BiCarb Insecticide + Fertilizer

Optional marketing information:



Dispersing Granule Technology

For control of selected surface and subsurface pests on turfgrass sites including residential lawns, parks and athletic fields and control of pests in and around flower beds, ornamental plantings and around buildings. Not for use on golf courses and sod farms.

Optional front panel claims:

- Ideal for Control of Adult Mole Crickets
- Effective for curative treatment of white grubs
- Effective on difficult to control southern chinch bugs
- Patent pending synergistic combination of insecticides
- Broad spectrum combination insecticide
- Contains essential plant nutrients for turf and ornamental maintenance

Active Ingredients

Bifenthrin₸ *	0.058%
Carbaryl (1-naphthyl N-methylcarbamate)	2.300%
Other Ingredients	97.642%
Total	100.000%

*Cis isomers 97% minimum, trans isomers 3% maximum
₸CAS No. 82657-04-6

NOTIFICATION
JAN 25 2011

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Visit our website: AndersonsLawnProducts.com
SGN150

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

EPA Reg. No. 9198-235
EPA Est. 9198-OH-1M, 9198-OH-2B, 9198-AL-001A
Underlined letter is first letter used in run code on bag

Back Panel *(for internal use only, will not appear on final label)*

The Andersons BiCarb Insecticide + Fertilizer

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

Guaranteed Analysis
Total Nitrogen (N) ..... XX%
Available Phosphate (P_2O_5) ..... XX%
Soluble Potash (K_2O) ..... XX%
Plant nutrients derived from:
For products being sold into states requiring fertilizer metals information::
Information regarding the contents and levels of metals in this product is available on the internet at http://www.regulatory-info-ap.com./

FIRST AID
Carbaryl is an N-Methyl Carbamate Insecticide.
GENERAL: Contact a physician immediately in all cases of suspected poisoning. Transport patient to a physician or hospital immediately and SHOW A COPY OF THIS LABEL TO THE PHYSICIAN. If poisoning is suspected in animals, contact a veterinarian.
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.
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 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 inhaled: 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.
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.

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.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long sleeved shirt and long pants, socks, shoes and chemical resistant gloves (such as natural rubber). Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Care should be used when applying to avoid fish and reptile pets in/around ornamental ponds. Harmful if inhaled, swallowed, or absorbed through the skin. Avoid breathing dust. Remove contaminated clothing before reuse.

User Safety Requirements: 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.

Personal Protective Equipment (PPE)
Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, neoprene rubber or viton. If you want more options, follow the instructions for category E on an EPA chemical-resistance category selection chart.

Loaders, applicators, and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves, and
- Shoes plus socks.

Aerial application is prohibited.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Discharge from rice fields may kill aquatic and estuarine invertebrates. Do not apply when weather conditions favor drift from area treated. Drift and run-off may kill aquatic invertebrates in water adjacent to treated areas. Do not contaminate water by cleaning equipment or disposal of wastes. ~~Do not contaminate water when disposing of equipment washwaters.~~ 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.

Note; for products 50lbs. or greater (this note will not appear on final label)
Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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 plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants being intended for aesthetic purposes or climate modification, and being grown in interior plantscapes, ornamental gardens or parks, or lawns or grounds.

In New York State, the product may NOT be applied to any grass or turf areas 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 this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Do not apply by air. Do not apply more than 690 lbs. of this product (0.4 lbs. bifenthrin, 16 lbs. carbaryl) 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.

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

Do not make applications during rain.

Entry Restrictions
Do not enter or allow others to enter the treated area until dusts have settled. In addition, if directions for use require watering-in, do not enter or allow others to enter the treated area (except those involved in the watering-in) until the watering-in is completed and the area has dried.

Restrictions
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.

TURFGRASS PEST CONTROL
General Information
This product controls surface and subsurface feeding pests on turfgrass sites (lawns, sod, turf areas) such as, but not limited to: residential and commercial lawns, grounds or lawns around business and office complexes, shopping centers, multi-family and residential apartment complexes, airports, military and other institutions, cemeteries, parks and picnic areas, playgrounds, schools, athletic fields. Not for use on golf courses, sod farms, nurseries, commercial greenhouses or grass grown for seed.

The active ingredients in this product also provide both curative and residual control of listed surface feeding pests.

The regional differences in pest species pressure, timing for optimal control, pest monitoring methods and other particulars for your location will vary, so consult your cooperative extension service for details. Most states have taxpayer-supported internet web sites and other services to provide this very helpful information. Please use and continue to support your local extension services.

Application Directions
Apply uniformly over the treatment area with either a broadcast or drop type spreader, avoiding spreaders which will apply product in narrow, concentrated bands. 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 recommended. Failure to follow the Directions for Use and all precautions may result in grass injury or poor pest control.

For optimal effectiveness, minimize thatch since heavy thatch will prevent the insecticide from penetrating to the area where insects are feeding. Although not dependent on immediate irrigation for activation, water must carry this material through the thatch. In conditions of drought it is recommended to water in this product.

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, please avoid applying product to sidewalks, driveways, roadways, and other impervious surfaces which are adjacent to storm drains. Sweep any misplaced granules back onto the area you are treating immediately after application, since storm drains often empty directly to nearby waterways.

Timing
Surface pests (leaf, crown and thatch inhabiting): Treat when pests or turf damage symptoms first appear, or when pests are detected by local site monitoring. Best results will occur if the treated area is thoroughly

irrigated with water after application. In conditions of drought, it is recommended to water in this product taking care to minimize runoff.

Subsurface pests (soil inhabiting): For best preventative treatment, apply 10 days to 2 weeks after egg-laying activity. As a curative treatment, apply when turf damage is first noted. Local site monitoring is recommended to determine optimal time of application. Contact your local State Extension Specialists for more specific information regarding the timing of applications, and for advice on how and when to monitor pest activity at your location. Some pests may have either single or multiple generations per year, depending on species, weather, and locale.

For best results, Irrigate treated areas soon after application, enough to thoroughly wet the underlying soil; this washes the active ingredients down below the turf and thatch, and it encourages the subsurface pests to move upward in the soil profile where they will come in contact with the active ingredients. For best pest control and turf culture, minimize thatch buildup to no more than 0.5 in., using mechanical removal methods as needed.

Do not apply more than 348 lbs. of product per acre (0.2 lb. bifenthrin, 8.0 lb. carbaryl active ingredient per acre) per application on residential use sites (i.e. around private home, apartment buildings, condominiums, non-agricultural outbuildings, non-commercial greenhouses, pre-schools or day care facilities). May be applied up to 690 lbs. of product per acre (0.4 lb. bifenthrin, 16 lb. carbaryl active ingredient per acre) per application on non-residential use sites (i.e. around institutional, public, commercial or industrial buildings; parks; recreational areas or athletic fields).

Application Rates

Pest	Amount of product
Armyworms (larvae of Armyworm, Fall Armyworm, Lawn Armyworm, and striped Grassworm), Cutworms (larvae of Black Cutworm, and Bronze Cutworm), Sod Webworms (larvae of Bluegrass Webworm, Larger Sod Webworm, Western Lawn Moth Cranberry Girdler, Tropical Sod Webworm, and Burrowing Sod Webworm)	87 lb./acre (2 lb./1,000 sq. ft.)
Annual Bluegrass Weevil (*Hyperodes*) (Adult), Adults of Bluegrass Billbug, Hunting Billbug, Phoenician Billbug and Denver Billbug, Black Turfgrass Ataenius (Adult), Mealybugs, Leafhoppers, Chinch Bugs (nymphs and adults of Hairy Chinch Bug, Southern Chinch Bug, and Buffalograss Chinch bug), Chiggers, Crickets, Darkling Ground Beetles, Earwigs, Essex Skipper, Fire Brats, Grasshoppers, Silverfish, Spittlebugs Springtails	87-174 lb./acre (2 – 4 lb./1,000 sq. ft.)
Ants, Centipedes, Fleas (Adult), Flea (Larvae), Millipedes, Ticks, Deer Ticks, American Dog Ticks, European Crane Fly, Imported Fire Ant (Adults), Mole Cricket (Adult), Mole Crickets (nymphs and adults of Tawny, Southern, Shortwinged, West Indian (Changa), Oriental (formerly African) and Native (northern) Mole crickets)	174 - 348 lb./acre (4 – 8 lb./1,000 sq. ft.)
White Grubs (larvae of Japanese Beetle, European Chafer, Northern Masked Chafer, Southern Masked Chafer, Oriental Beetle, Asiatic Garden Beetle, May/June beetle (*Phyllophaga* spp.,) Bluegrass billbug, Hunting Billbug, Phoenician Billbug, Denver (Rocky Mountain) Billbug, Green June beetle, Black Turfgrass ataenius, and Aphodius) and Annual Bluegrass weevil (Hyperodes weevil) and European Cranefly larvae,	preventative: 87-174 lb./acre (2 – 4 lb /1,000 sq. ft.) curative: 174 - 348 lb./acre (4-8 lb /1,000 sq. ft.)
Pillbugs (Sowbugs)	348 lb./acre (8 lb./1,000 sq. ft.)

Armyworms, Cutworms, Sod Webworms: Apply when monitoring or damage symptoms for the larval stages of these pests warrant. 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 (*Hyperodes*) (Adult): Treatment should be made to control the adult weevils as they migrate from their overwintering sites such as roughs and debris under ornamental plantings, shrubs and trees, especially White Pines, and move into grass areas. This movement generally begins when Forsythias bloom and ends when flowering dogwoods are in bloom. There are often two generations in New York. Contact your State Cooperative Extension Service for more specific information.

Billbugs

(Adult/preventative): In temperate regions, apply when adult billbugs are first observed during April and May. These spring applications targeting billbug adults will also provide control of over-wintered chinch bugs. When possible, controlling the mobile adult stage helps prevent turf damage later in the year from the larvae. Consult your State Cooperative Extension Service for information on degree days, monitoring, and timing in your region.

(Larvae/curative): This damaging stage may be found in cool season or temperate areas from May into October. The Hunting and Denver species overwinter as larvae, and Hunting Billbugs breed continuously in the Deep South. While most Billbugs in cool season areas typically have one generation per year, due to multiple generations in warmer regions, and extended egg-laying periods throughout their ranges, apply when damage from this stage is noticed. Irrigate thoroughly after application, enough to wet the underlying soil, for best results.

Black Turfgrass Ataenius (Adult): 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 (*Spirea vanhouttei*) and Horse chestnut (buckeye tree) *(Aesculus hippocastanum*). The July application should coincide with the blooming of Rose of Sharon (*Hibiscus syriacus*).

Chinch Bugs: These pests infest the base of the plant and are usually found in the thatch layer. All three stages, eggs, nymphs and adults, are may be present at the same time in late season temperate and southern locations. Treat when monitoring or damage indicates the presence of populations above damage thresholds. Watering the treated area with up 0.25 inches immediately after application will result in quicker control. Higher application rates may be required to control both nymphs and adults during the summer or in warm season turf areas, and to provide extended residual 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. If soil is not moist, then it is important to irrigate before application. Apply 4-8 lbs per 1,000 sq. ft. to control foraging fire ants, high rates provide longer residual control. Use The Andersons Professional Turf Products Prosect for mound drench treatments

Mole Crickets

Adults: Achieving acceptable control of adult mole crickets may be difficult because preferred grass areas are subject to continuous invasion 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. Use The Andersons Professional Turf Products Fertibait with bifenthrin for Mole Crickets *{or The Andersons Professional Turf Products 0.15G ProSect}* for excellent control of the active adult stage of this pest.

Nymphs: Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately before 1-2 weeks past 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 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.

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. Retreatment might also be necessary due to animals reintroducing new populations. Do not allow public use of treated areas during application.

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 and leaf litter.

American Dog Ticks: These ticks tend to gather along paths or roadways where humans are likely to be found. Treatments should be made from mid-spring to early fall to control larvae, nymphs and adults.

White grubs: Preventative applications are made 10 days to 2 weeks following peak adult flight activity as determined by local site monitoring, or as recommended by local cooperative extension agents. Curative applications should be made when grubs are feeding near the soil surface, usually during late March through May or July to early September, when damage symptoms first become evident, or as recommended by extension. See the Comprehensive Turf Insect Control section below for more information on controlling grubs as well as surface pests For best results, Irrigate treated areas soon after application, enough to thoroughly wet the underlying soil. Use higher rates in areas of heavy pressure and where thatch is present in excess of 0.5 in. thickness. Reduce thatch by mechanical means for best turf quality and better control of grub species..

European Crane Fly: Adults emerge form the soil to lay eggs from late August to mid-September. In areas with historic problems, an October treatment can be used to control this pest at this early, most vulnerable larval stage, which will avoid damage the following year. Otherwise, monitor turf areas in winter and early spring when there is a consistent warmer period, treating when the larvae are present. Discontinue monitoring and control measures in early May, when these pests pupate and stop feeding.

Comprehensive Turf Insect Control
The "multiple target principle" of insect control utilizes strategically timed applications to manage multiple insect pests with minimal pesticide applications. For example, this product may be used as a curative application for white grubs in early August for cool season turf areas to control most white grub species. As the white grub life cycle chart for the **cool season turf regions** below illustrates, application timing in the indicated bracket area will control many of the grub species when they are at their most vulnerable, soon after egg hatch when grubs are small. During this period, adequate grub control can be obtained at 4 pounds per 1,000 sq. ft. in all but the most extreme situations (heavy thatch, heavy pressure), and the economical 2 pounds per 1,000 sq. ft. can handle most situations, especially when used in conjunction with early applications (see below).

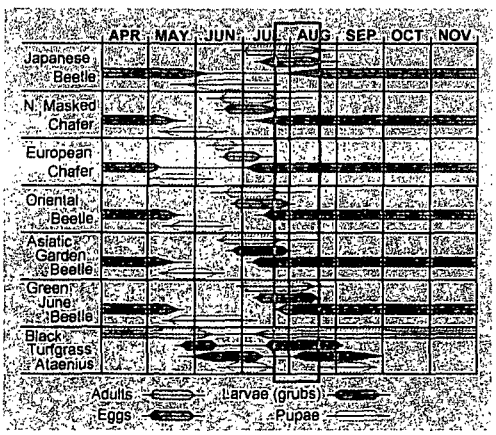


Chart: optimal cool season white grub application timing

In addition, early applications to control surface pests in mid-April too early or mid-May will also help control white grubs which have moved up as the soil warms into the surface soil, just below the grass and thatch. This application timing will reduce grub pressure from the over wintered grub generation, and can manage populations of turf surface pests as well.

Regional Timing for Comprehensive Turf Pest Control; general recommendations
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) as needed 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 for best results. Additional applications 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 for European Crane Fly control in the PNW, see detailed instructions above.

NUISANCE PEST CONTROL IN AND AROUND FLOWER BEDS AND ORNAMENTAL PLANTINGS AND AROUND BUILDINGS
For control of Ants, Armyworms, Ticks, 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. For most effective control, treated areas should be lightly watered after application. Repeat treatments as necessary to control new infestations.

Suggested Spreader Settings
These suggested spreader settings are not intended to replace calibration.
Please calibrate your spreader before applying product.
XX lbs. treats X,XXX sq. ft. at the 87 lbs. product/acre - LOW RATE (2 lbs./1,000 sq. ft. rate)
XX lbs. treats X,XXX sq. ft. at the 174 lbs. product/acre - MEDIUM RATE (4 lbs./1,000 sq. ft. rate)
XX lbs. treats X,XXX sq. ft. at the 348 lbs. product/acre - HIGH RATE (8 lbs./1,000 sq. ft. rate)

SPREADER	GROUND SPEED	WIDTH OF COVERAGE	SPREADER SETTINGS		
			LOW RATE	MEDIUM RATE	HIGH RATE
Active ingredient/acre (bifenthrin, carbaryl)			0.05, 2.00	0.10, 4.00	0.20, 8.00
AA	X mph	XX ft	X	X	X
BB	X mph	XX ft	X	X	X
CC	X mph	XX ft	X	X	X

Note:. This list of spreaders and settings will vary dependent on market availability of spreaders. (this note will not appear on final 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 rate.

This product may be applied only by properly calibrated drop or broadcast spreader. Do not apply by hand, spoon treatment or belly grinder.

Essential Plant Nutrient Table

Application Rate # product/1,000 sq. ft.	# N/1,000 sq. ft.	# P_2O_5/1,000 sq. ft.	# K_20/1,000 sq. ft.	# {*Micronutrient*} /1,000 sq. ft.
2.0	X	X	X	X
4.0	X	X	X	X
8.0	X	X	X	X

Note: To be completed at final label printing, shows the rates of nutrients per unit area treated at the various rates of application(this note will not appear on final label)

Note: The plant nutrients in this product are provided for extra value as guaranteed and described in the fertilizer information section above. Due to the variety of plantings, cultural practices, weather and other factors, the user must determine the suitability of the use of this product at the rate used for each specific situation.

Back Panel *(for internal use only, will not appear on final label)*

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.
PESTICIDE DISPOSAL: Wastes resulting from the use of the 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. Offer for recycling, if available. Completely empty bag into application equipment. Then 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.

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. (AP110606)

Manufactured by:
The Andersons Lawn Fertilizer Division, Inc., d/b/a Free Flow Fertilizer
PO Box 119
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