



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Dawn L. Walters
Regulatory Administrator
The Andersons Lawn Fertilizer Division, Inc.
d/b/a Free Flow Fertilizer
P.O. Box 119
Maumee, OH 43537

APR 4 2008

RE: Notification to revise Warranty Statement per EPA Guidance
EPA Registration Number: 9198-236
Submission Dated: March 13, 2008

Dear Ms. Walters:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, March 13, 2008, for the product, The Andersons 0.2% Imidacloprid Insecticide + Fertilizer. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9198-236	2. EPA Product Manager Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) The Andersons 0.2% Imidacloprid Insecticide + Fertilizer	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) The Andersons Lawn Fertilizer Division, Inc. d/b/a Free Flow Fertilizer PO Box 119 Maumee, OH 43537 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. 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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION

APR 4 - 2008

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Label change per PR Notice 98-10: Revised warranty per EPA guidance. See cover letter for details.

This notification is consistent with the guidance of PR Notice 98-10 and the requirements of EPA's regulations at 40 CFR 156.10 and 40 CFR 152.46 and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 98-10 and the requirements of 40 CFR 156.10 and 40 CFR 152.46, 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	Other (Specify) _____	
		If "Yes" Package wgt	No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dawn L. Walters	Title Regulatory Administrator	Telephone No. (Include Area Code) 419-897-6790
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Dawn L. Walters</i>	3. Title Regulatory Administrator	
4. Typed Name Dawn L. Walters	5. Date 3/13/08	

The Andersons 0.2% Imidacloprid Insecticide + Fertilizer

For use to control white grub larvae, mole crickets and other insect pests on any turfgrass site including residential lawns, golf courses and sod farms and in landscaped plantings, such as trees, in commercial and residential settings, golf courses, parks, recreational areas, and athletic fields.

Optional front panel claims:

- Controls early nymph stages of mole crickets
- Contains {brand name} controlled release nitrogen
- Contains NS-52® controlled release nitrogen
- Contains MUtech™ controlled release nitrogen
- Contains Poly-S™ controlled release nitrogen
- Contains proprietary DG Pro® dispersible carrier
- Contains essential plant nutrients for turf and ornamental maintenance
- Contains essential plant nutrients to enhance recovery and resistance to destructive insect pests
- Ideal for white grub control
- Ideal for control of subsurface pests
- Contains GrubOut™ Insecticide, based on the active ingredient imidacloprid
- Multiple use rates allow targeting of specific insects
- DG Pro dispersible carrier – minimizing mower pickup and visibility on the turf
- For fertilization and insect control in turfgrass and landscape ornamentals and sod farms
- High uniformity precision blend for accurate spreading
- Small particle formula
- X% of nitrogen is from Poly-S slow release nitrogen
- Greatly reduces fertilizer loss due to ball, shoe & mower pickup
- Patented Dispersing Granule Formula

Guaranteed Analysis

Total Nitrogen (N)	XX%
Available Phosphate (P ₂ O ₅)	XX%
Soluble Potash (K ₂ O)	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/>

Active Ingredients

Imidacloprid† 0.2%

Other Ingredients 99.8%

Total 100.0%

TCAS No.

EPA Reg. No. 9198-236

EPA Est. 9198-OH-1M, 9198-OH-2B, 9198-AL-001A

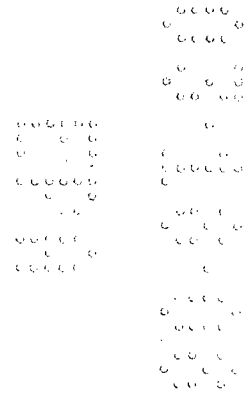
Underlined letter is first letter used in run code on bag

Net Weight XX lbs. (XX kg)

Covers Up To XX,XXX Sq. Ft.

KEEP OUT OF REACH OF CHILDREN

CAUTION



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Harmful if swallowed or absorbed through the skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Personal Protective Equipment (PPE):

WPS Uses: The following Personal Protective Equipment requirements apply to uses covered under the Worker Protection Standard (40CFR Part 170), i.e. sod farm uses:

Applicators and other handlers must wear:

- Protective eye wear
- Long sleeved shirt and long pants
- Chemical resistant-gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes and socks

Non-WPS Uses: The following Personal Protective Equipment requirements apply to uses other than those covered by the WPS:

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Gloves
- Shoes and socks

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.

FIRST AID

If swallowed	<ul style="list-style-type: none"> • 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	<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 treatment advice
If in eyes	<ul style="list-style-type: none"> • 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.
If inhaled	<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

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.

Note to Physician: No specific antidote is available. Treat patient symptomatically.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or when disposing of equipment washwaters.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

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 container grown ornamentals.

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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

General Information

This product controls subsurface feeding pests on any turfgrass site (lawns, sod, turf areas) such as, but not limited to: golf courses, 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, and sod farms. It also controls insect pests in landscaped areas in golf courses, commercial and residential settings, parks, recreational areas, and athletic fields.

Application Timing

Treat prior to or during the egg laying activity and before the eggs hatch. Applications made prior to the pest infestation followed by adequate irrigation will result in the best control. Determine the need and timing of application by local site monitoring, prior history of pest infestation, current adult trappings or other methods. 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. To find your local extension agent, visit www.csrees.usda.gov.

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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 turf injury or poor pest control.

For best results, irrigate treated areas soon after application, enough to thoroughly wet the underlying soil; this washes the active ingredient 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 ingredient. For best pest control and turf culture, minimize thatch buildup to no more than 0.5 in., using mechanical removal methods as needed.



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.

Application Rates - Turfgrass

Pest	Amount of Product
White Grub Larvae, such as: Annual bluegrass weevil, (<i>Hyperodes</i> spp.) Aphodius, (<i>Aphodius</i> spp.) Asiatic garden beetle, (<i>Maladera castanea</i>) Billbugs, (<i>Sphenophorus</i> spp.) Black turfgrass ataenius, (<i>Ataenius spretulus</i>) European chafer, (<i>Rhizotrogus majalis</i>) Japanese beetle, (<i>Popillia japonica</i>) May or June beetles, (<i>Phyllophaga</i> spp.) Northern & Southern masked chafers, (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>) Oriental beetle, (<i>Anomala orientalis</i>)	125 – 200 lb./acre or 3.0 – 4.5 lb./1,000 sq. ft.
Crane Fly, such as European species, (<i>Tipula</i> spp.)	125 – 200 lb./acre or 3.0 – 4.5 lb./1,000 sq. ft.
Mole crickets, (<i>Scapteriscus</i> spp.)	200 lb./acre or 4.5 lb./1,000 sq. ft.

White grubs: Ideal timing for preventative applications are made is the time of peak adult flight activity as determined by local site monitoring, or as recommended by local cooperative extension agents. This is also the primary egg laying period, which will yield the best results.

Cool Season Turf Regions

The white grub life cycle chart for the cool season turf regions below illustrates application timing that will control many of the grub species when they are most vulnerable. During this period, adequate grub control can be obtained at 3.0 pounds per 1,000 sq. ft. in all but the most extreme situations (heavy thatch, heavy insect pressure) where the 4.5 lbs per 1,000 sq. ft. rate is necessary for adequate control.

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Application Rates – Ornamentals (including trees, shrubs, evergreens, flowers, foliage plants and ground covers)

Pest	Amount of Product
White Grub Larvae such as: Asiatic garden beetle, (<i>Maladera castanea</i>) European chafer, (<i>Rhizotrogus majalis</i>) Japanese beetle, (<i>Popillia japonica</i>) Northern & Southern masked chafers, (<i>Cyclocephala borealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>) May or June beetles, (<i>Phyllophaga</i> spp.) Oriental beetle, (<i>Anomala orientalis</i>)	125 – 200 lb./acre or 3.0 – 4.5 lb./1,000 sq. ft.

Before application, remove any weed barrier material that does not allow water permeability.

General Use Precautions and Restrictions

Do not apply to saturated soils or waterlogged areas. The product cannot penetrate into the root zone of the plant in these conditions.

Do not apply more than 200 lbs. of product per acre (0.4 lb. active ingredient per acre) per year.

Do not mow turf until after the treatment area has received adequate irrigation or rainfall.

Do not apply to vegetable gardens.

Do not use on container grown ornamentals.

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 125 lbs. product/acre - LIGHT RATE (3.0 lbs./1,000 sq. ft. rate)

XX lbs. treats X,XXX sq. ft. at the 150 lbs. product/acre - LOW RATE (3.5 lbs./1,000 sq. ft. rate)

XX lbs. treats X,XXX sq. ft. at the 175 lbs. product/acre - MEDIUM RATE (4.0 lbs./1,000 sq. ft. rate)

XX lbs. treats X,XXX sq. ft. at the 200 lbs. product/acre - HIGH RATE (4.5 lbs./1,000 sq. ft. rate)

SPREADER	GROUND SPEED	WIDTH OF COVERAGE	SPREADER SETTINGS			
			LIGHT 0.25 lbs. ai/A	LOW 0.30 lbs. ai/A	MEDIUM 0.35 lbs. ai/A	HIGH 0.40 lbs. ai/A
aa	X mph	XX ft/	X	X	X	X
bb	X mph	XX ft	X	X	X	X
cc	X mph	XX ft	X	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.

Essential Plant Nutrient Table

Application Rate # product/1,000 sq. ft.	# N/1,000 sq. ft.	# P ₂ O ₅ /1,000 sq. ft.	# K ₂ O/1,000 sq. ft.	# {Micronutrient}/1,000 sq. ft.
3.0	X	X	X	X
3.5	X	X	X	X
4.0	X	X	X	X
4.5	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

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.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

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: 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. Where permissible, 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. (AP031208)

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

{website address}
SGN XXX

Date Printed	3/13/08
Date Approved	3/1/07
Supersedes	New
Label Changes	Not - claims, warranty
Filename	9198-236
Label code	APnot0301208



The Andersons, Inc.

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

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March 13, 2008

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

RE: Notification of Minor Label Change

SUBJECT: The Andersons 0.2% Imidacloprid Insecticide + Fertilizer
EPA Reg. No. 9198-236

Per PR Notice 98-10 enclosed is EPA Form 8570-1, an application notifying the Agency of a revision to the labeling for the subject registration. A copy of the revised labeling is enclosed with the additions underlined and marked in blue and deletions marked in red strikeout.

1. We are proposing to revise the warranty statement per Agency's Guidance on Warranty Statements, dated October 10, 2006.

Previous warranty:

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. Where permissible, 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. 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.

Revised warranty:

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.

