PLEASE NOTE

This image contains more than one label approved for this product on this date.
Ms. Debbie Ziehr  
Regulatory Administrator  
The Andersons, Inc.  
P.O. Box 119  
Maumee, OH 43537

Subject: The Andersons 0.2% Imidacloprid Insecticide + Fertilizer  
EPA Reg. No. 9198-236  
Notification Application Dated May 11, 2009

Dear Ms. Ziehr:

The Agency has reviewed your amended Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated May 11, 2009, for The Andersons 0.2% Imidacloprid Insecticide + Fertilizer, EPA Reg. No. 9198-236. The Registration Division (RD) has reviewed this request for applicability under PRN 98-10 and finds that the amended request can be accepted as falling within the scope of PRN 98-10.

The claim “Contains Nutrisphere-N®” may only be placed on the label for containers of this product when that ingredient is actually in the formulation. In all other instances, this claim would be a false statement about the composition of the product and a “false or misleading statement about the value of the product for purposes other than as a pesticide”. See 40 CFR §156.10(a)(5)(ii) and 40 CFR §156.10(a)(5)(iii).

If you have any questions, please call me directly at 703-305-6406.

Sincerely,

William W. Jacobs  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs
Application for Pesticide - Section I

1. Company/Product Number
   9198-236

2. EPA Product Manager
   Eagle

3. Proposed Classification
   [ ] None [ ] Restricted

4. Company/Product (Name)
   The Andersons 0.2% Imidacloprid Insecticide & Fertilizer

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
   [ ] Check if this is a new address

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)
   (b)(1), my product is similar or identical in composition and labeling
   to:
   EPA Reg. No.

Section - II

[ ] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated

[ ] Notification - Explain below.
[ ] Final printed labels in response 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 PR Notice 98-10: Added optional marketing claim. 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:
   Child-Resistant Packaging
   [ ] Yes   [ ] No
   [ ] Certification must submitted

   Unit Packaging
   [ ] Yes   [ ] No
   [ ] Water Soluble Packaging
   [ ] Yes   [ ] No
   [ ] Metal
   [ ] Plastic
   [ ] Glass
   [ ] Paper
   [ ] Other (Specify)

2. Type of Container
   [ ] Lithograph
   [ ] Paper glued
   [ ] Stenciled
   [ ] Other pocket

3. Location of Net Contents Information
   [ ] Label
   [ ] Container

4. Size(s) Retail Container
   10 - 2,000 lbs.

5. Location of Label Directions
   [ ] On Label

6. Manner in Which Label is Affixed to Product
   [ ] Other

Section - IV

1. Contact Point
   [ ] Complete items directly below for identification of individual to be contacted, if necessary, to process this application.
   Name
   Debbie Ziehr
   Title
   Regulatory Administrator
   Telephone No. (Include Area Code)
   419-331-6671

2. Signature
   [ ] Debbie Ziehr

3. Title
   Regulatory Administrator

4. Typed Name
   Debbie Ziehr

5. Date
   5/1/09

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 knowingly false or misleading statement may be punishable by fine or imprisonment, both under applicable law.

6. Date Application
   Received
   3/2/09

EPA Form 85-70-1 (Rev. 3-94) Previous editions are obsolete.

White - EPA File Copy (original) Yellow - Applicant Copy
May 11, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7505P)
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. One copy of the revised labeling is enclosed with changes marked in blue.

We have added the following optional marketing claims:

Contains Nutrisphere-N®

If there are any questions or comments regarding this notification, please contact me.

Sincerely,

The Andersons Lawn Fertilizer Division, Inc.

[Signature]

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

Enclosures
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:

Dispersing Granule Technology

- Controls white grub larvae, mole crickets & other insect pests
- Greatly reduces nutrient loss due to ball, shoe & mower pickup
- 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
- Contains Nutrisphere-N®

Guaranteed Analysis

Total Nitrogen (N) ........................................................... XX%
Available Phosphate (P₂O₅) .............................................. XX%
Soluble Potash (K₂O) ..................................................... 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
ImidaclopridF* ................................................................. 0.2%

Other Ingredients ............................................................ 99.8%
Total ................................................................. 100.0%

TCAS No. 138261-41-3
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
- 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, if present, after the first 5 minutes, then continue rinsing
- Call a poison control center or doctor for treatment advice

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.

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.

**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**

<table>
<thead>
<tr>
<th>Pest</th>
<th>Amount of Product</th>
</tr>
</thead>
<tbody>
<tr>
<td>White Grub Larvae, such as:</td>
<td></td>
</tr>
<tr>
<td>Annual bluegrass weevil, (<em>Hyperodes</em> spp.)</td>
<td>125 – 200 lb./acre</td>
</tr>
<tr>
<td>Aphodius, (<em>Aphodius</em> spp.)</td>
<td>or</td>
</tr>
<tr>
<td>Asiatic garden beetle, (<em>Maladera castanea</em>)</td>
<td>3.0 – 4.5 lb./1,000 sq. ft.</td>
</tr>
<tr>
<td>Billbugs, (<em>Sphenophorus</em> spp.)</td>
<td></td>
</tr>
<tr>
<td>Black turfgrass atenaenius, (<em>Ataenius spretulus</em>)</td>
<td></td>
</tr>
<tr>
<td>European chafer, (<em>Rhizotrogus majalis</em>)</td>
<td></td>
</tr>
<tr>
<td>Japanese beetle, (<em>Popilia japonica</em>)</td>
<td></td>
</tr>
<tr>
<td>May or June beetles, (<em>Phyllophaga</em> spp.)</td>
<td></td>
</tr>
<tr>
<td>Northern &amp; Southern masked chafers, (<em>Cyclocephala borealis</em>, <em>C. immaculata</em>, and/or <em>C. lurida</em>)</td>
<td></td>
</tr>
<tr>
<td>Oriental beetle, (<em>Anomala orientalis</em>)</td>
<td></td>
</tr>
<tr>
<td>Crane Fly, such as European species, (<em>Tipula</em> spp.)</td>
<td>125 – 200 lb./acre</td>
</tr>
<tr>
<td>or</td>
<td>3.0 – 4.5 lb./1,000 sq. ft.</td>
</tr>
<tr>
<td>Mole crickets, (<em>Scapteriscus</em> spp.)</td>
<td>200 lb./acre</td>
</tr>
<tr>
<td>or</td>
<td>4.5 lb./1,060 sq. ft.</td>
</tr>
</tbody>
</table>
**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.

![Chart: Cool season white grub life cycle](chart reprinted with permission of Dr. David Shetlar, Entomologist, Ohio State University, www.bugdoc.edu)

For best results, irrigate treated areas soon after application, enough to thoroughly wet the underlying soil. Use higher application 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.

**Crane Fly (such as European species)**: Adults emerge from 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 late April, because these pests pupate and stop feeding soon after that time.

**Mole Crickets**

**Adults**: To control adult or large nymph mole crickets, this product should be used in conjunction with a curative insecticide, such as Andersons Golf Products Fertibait™ with bifenthrin, Andersons Golf Products 0.15G ProSect, or The Andersons Professional Turf Products 0.15G ProSect.

**Nymphs**: Grass areas that received intense adult mole cricket pressure in the spring should be treated 1 week before or no later than 2 weeks after 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 more frequent applications to maintain acceptable control. Applications 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.
Application Rates – Ornamentals (including trees, shrubs, evergreens, flowers, foliage plants and ground covers)

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

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)

<table>
<thead>
<tr>
<th>SPREADER</th>
<th>GROUND SPEED</th>
<th>WIDTH OF COVERAGE</th>
<th>SPREADER SETTINGS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>LIGHT 0.25 lbs. a.i/A</td>
</tr>
<tr>
<td>aa</td>
<td>X mph</td>
<td>XX ft/</td>
<td>X</td>
</tr>
<tr>
<td>bb</td>
<td>X mph</td>
<td>XX ft/</td>
<td>X</td>
</tr>
<tr>
<td>cc</td>
<td>X mph</td>
<td>XX ft/</td>
<td>X</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Application Rate # product/1,000 sq. ft.</th>
<th># N/1,000 sq. ft.</th>
<th># P2O5/1,000 sq. ft.</th>
<th># K2O/1,000 sq. ft.</th>
<th># Micronutrient 1/1,000 sq. ft.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.0</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.5</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>4.0</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>4.5</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

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

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

{website address}
SGN XXX
NEXT

LABEL
Ms. Debbie Ziehr  
Regulatory Administrator  
The Andersons, Inc.  
P.O. Box 119  
Maumee, OH 43537

Subject: The Andersons 0.2% Imidacloprid Insecticide + Fertilizer  
EPA Reg. No. 9198-236  
Notification Application Dated May 1, 2009

Dear Ms. Ziehr:

The Agency has reviewed your amended Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated May 1, 2009, for The Andersons 0.2% Imidacloprid Insecticide + Fertilizer, EPA Reg. No. 9198-236. The Registration Division (RD) has reviewed this request for applicability under PRN 98-10 and concludes that it falls within the scope of PRN 98-10.

The additional brand name “The Andersons Turf Products Fertilizer with GrubOut Insecticide 21-0-0” may be used for this product, but only when the expression is consistent with the content of the fertilizer component of the product. In all other instances, this alternative brand name would be a false statement about the composition of the product and a “false or misleading statement about the value of the product for purposes other than as a pesticide”. See 40 CFR §156.10(a)(5)(ii) and 40 CFR §156.10(a)(5)(iii). Note also that the brand name GrubOut is used in Canada in reference to certain products containing the insecticide Carbaryl and that GRUB-OUT formerly was used in the U.S. for an Isofenphos product. These circumstances may be confusing to some people shopping for pesticides.

If you have any questions, please call me directly at 703-305-6406.

Sincerely,

William W. Jacobs  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs
### Application for Pesticide - Section I

1. **Company/Product Number**
   - 9198-236

2. **EPA Product Manager**
   - Eagle

3. **Proposed Classification**
   - None

4. **Company/Product (Name)**
   - The Andersons 0.2% Imidacloprid Insecticide & Fertilizer

5. **Name and Address of Applicant (Include ZIP Code)**
   - The Andersons Lawn Fert. Div., Inc.
   - d/b/a Free Flow Fert.
   - P.O. Box 119
   - Maumee, OH 43537

   - Check if this is a new address

### Section - II

- **Amendment - Explain below.**
- **Resubmission in response to Agency letter dated**
- **Notification - Explain below.**

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

Notification of Alternate Brand Name per PR Notice 98-10: The Andersons Turf Products Fertilizer with GrubOut Insecticide 21-0-0

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:**
   - **Child-Resistant Packaging**
     - Yes
     - No
   - **Unit Packaging**
     - Yes
     - No
   - **Water Soluble Packaging**
     - Yes
     - No
   - **No. per container**
     - If "Yes"
     - Unit Packaging wgt.
   - **Package wgt.**
     - If "Yes"

2. **Type of Container**
   - Metal
   - Plastic
   - Glass
   - Paper
   - Other (Specify)

3. **Location of Net Contents Information**
   - Label
   - Container

4. **Size(s) Retail Container**
   - 10 - 2,000 lbs.

5. **Location of Label Directions**
   - [ ] On Label
   - [ ] Other
   - Pocket

6. **Manner in Which Label is Affixed to Product**
   - Lithograph
   - Paper glued
   - Stenciled

### Section - IV

1. **Contact Point**
   - **Name:** Debbie Ziehr
   - **Title:** Regulatory Administrator
   - **Telephone No. (Include Area Code):** (419) 831-6671

**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 knowingly false or misleading statement may be punishable by fine or imprisonment, both under applicable law.

2. **Signature**
   - Debbie Ziehr

3. **Title**
   - Regulatory Administrator

4. **Typed Name**
   - Debbie Ziehr

5. **Date**
   - 5/1/09
May 1, 2009

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

Subject: NOTIFICATION - Additional Brand Name

RE: The Andersons 0.2% Imidacloprid Insecticide & Fertilizer
EPA Reg. No. 9198-236

Per PR Notice 98-10, enclosed is an EPA Form 8570-1, an application notifying the Agency that we wish to market additional products under the subject basic registration. The additional brand name is:

The Andersons Turf Products Fertilizer with GrubOut Insecticide 21-0-0

One copy of the draft label is enclosed.

If there are any questions regarding this notification, please contact me.

Sincerely,

The Andersons Lawn Fertilizer Division, Inc.

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

Enclosure
Ornamental, drought-resistant shrubs, and trees

Applicational Insects, shrubs, and trees

Norton Globtacco.

Fertilizer

9.4

3

4

Wash your hands after handling and before eating, drinking, or chewing food.

Underlined terms in this statement are required terms of this product.

Environmental Hazards

This product is highly toxic to aquatic organisms. Do not apply directly to water or in areas where surface runoff will carry the treated water to a watercourse or pond. This product is designed for use in areas such as, but not limited to, roadways, yards, and gardens. Take care of the environment, protect the aquatic environment, and prevent the drift of this product to water bodies.