



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

September 14, 2005

William Washburn
Micro Flo Company LLC
P.O. Box 772099
Memphis, TN 38117

Subject: Amendment - Revise label for copyright infringement
Bifenthrin 0.2%G GC
EPA Reg. No. 51036-388
Your Letter Dated June 17, 2005

Dear Mr. Washburn:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Move the paragraph beginning, "Do not apply this product in a way that will contact etc.", to the top of the Agricultural Use Requirements box.
2. Under Directions for Use change, the advisory phrases, "should not be made" to "must not be made".
3. On page 5 under Imported Fire Ant delete part of the sentence "..... or by applying ½ cup of Bifenthrin 0.2% G GC. If Bifenthrin 0.2%G GC xxx of water." Data demonstrating that this product is effective as a mound treatment has not been submitted.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

BeWanda Alexander for

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

3/9

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators, or persons under their direct supervision and only for those uses covered by certified applicator's certification.

BIFENTHRIN 0.2%G GC

INSECTICIDE

For control of Insect Pests including imported fire ants and mole crickets on lawns and perimeters around buildings (residential, commercial, industrial, public and institutional) and parks. For Use on Sod Farms and Recreational Areas including Golf Courses and Athletic Fields.

DO NOT USE THIS PRODUCT ON GOLF COURSES AND SOD FARMS IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK.

ACTIVE INGREDIENT:	By Wt.
Bifenthrin*.....	0.2%
INERT INGREDIENTS:.....	99.8%
TOTAL:.....	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See other panels for additional precautionary information.

EPA Reg. No. 51036-388
EPA Est. No. 51036-GA-001
AD xxxxxx

NET CONTENTS: _____

Manufactured By:
Micro Flo Company LLC
P.O. Box 772099
Memphis, TN 38117

ACCEPTED
with COMMENTS
In EPA Letter Dated
SEP 14 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
51036-388

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.

NOTE TO PHYSICIAN: This pesticide is a pyrethroid. If significant quantities have been swallowed, promptly eliminate the ingested quantities from the stomach and intestines. Treatment is symptomatic and supportive. Alcohol, milk, cream, and other digestible fats and oils should NOT be administered as they may increase absorption.

EMERGENCY TELEPHONE NUMBERS:

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

(800) 424-9300 CHEMTREC (transportation and spills)
 (800) 832-HELP (4357) Human Health
 (800) 345-4735 ASPCA (animal health)

PRECAUTIONARY STATEMENTS
Hazards to Humans (and Domestic Animals)

Caution. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing.

The following Personal Protective Equipment requirements apply to sod farm use only.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

1. Long sleeved shirt and long pants
2. Waterproof gloves
3. 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:

1. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
2. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
3. 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.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and 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 apply when weather conditions favor drift from treated areas. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

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.

Do not use this product on plants grown for sale, for research purposes, for commercial seed production or for any other commercial use. This product is intended for use only on plants grown for aesthetics uses or for climatic alteration such as plants in interior landscapes, ornamental gardens, parks and lawns.

Apply using ground equipment only; do not apply by air.

For residential sites such as homes, apartments, condominiums, preschools, day care facilities, outbuildings that are not used for agricultural purposes, private (non-commercial) greenhouses etc. Apply no more than 100 pounds of BIFENTHRIN 0.2%G GC (0.2 lb. active ingredient (a.i.)) per acre per application on residential use sites. For applications near institutional, public, commercial or industrial buildings, parks, recreational areas or athletic fields, use up to 0.4 lb. a.i. per acre per application.

Per acre, apply no more than 200 lbs. BIFENTHRIN 0.2%G GC (0.4 lbs. a.i.) in a year.

Application should not be made within a 25 foot radius of the following: lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries, and commercial fish farm ponds.

Application should not be made on the following: nurseries, commercial greenhouses, and grass grown for seed.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker 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 intervals. 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 to 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:

1. Coveralls
2. Waterproof gloves
3. Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standards for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries and greenhouses.

Do not allow people or pets on treated surfaces until the spray has dried.

Do not touch treated surfaces until dry.

6/9

STORAGE AND DISPOSAL

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

Pesticide Storage: Open dumping is prohibited. Do not store this product near fertilizers, seeds, or other pesticides.

Keep this product out of reach of children and animals at all times. Store this product in a cool, dry place in its original container only. Do not expose the product to excessive heat. Open the product container carefully and, after use, seal tightly.

To Contain a Spill: Cover the spilled product to prevent the material from spreading. If the product container is damaged, place the entire container along with the product in a secure receptacle and clearly label the contents.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal:

Paper and plastic bags: Completely empty bag into application equipment. Then dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

APPLICATION TO SOD (including Sod Farms, Lawns and Golf Courses) AND PERIMETERS

SOD APPLICATION: Use equipment designed to give uniform coverage of the area to be treated to Broadcast BIFENTHRIN 0.2%G GC.

The following table provides recommended application rates of this product for control of the respective pests under normal conditions. However, for each pest listed BIFENTHRIN 0.2%G GC can be applied at a rate up to 0.4 lbs ai/A (200 pounds per acre). When used on residential sites such as lawns, do not apply more than 0.2 abs ai/A (100 pounds) per application.

INSECT	POUNDS PER ACRE OF ACTIVE INGREDIENT	POUNDS PER ACRE OF BIFENTHRIN 0.2%G GC	POUNDS PER 1000 SQ.FT. OF BIFENTHRIN 0.2%G GC
Armyworms ¹ Cutworms ¹ Sod Webworm ¹	0.1 lbs. a.i./A	50 lbs. per acre	1.15 lbs. per 1000 sq.ft.
Annual Bluegrass Weevil (Hyperodes) (Adult) ² Billbugs (Adult) ³ Black Turfgrass Ataenius (Adult) ⁴ Leafhoppers Mealybugs	0.1 - 0.2 lbs. a.i./A	50 - 100 lbs. per acre	1.15 - 2.3 lbs. per 1000 sq.ft.
Ants Centipedes Chinch Bugs ⁵ Fleas (Adults) Fleas (Larvae) ⁶ Imported Fire Ants (Adult) ⁷ Imported Fire Ants (Mounds) ⁷ Millipedes	0.2 - 0.4 lbs. a.i./A	100 - 200 lbs. per acre	2.3 - 4.6 lbs. per 1000 sq.ft.

Mole Cricket (Adult) ⁸			
Mole Cricket (Nymph) ⁹			
Pillbugs	0.4 lbs.	200 lbs. per	4.6 lbs.
Sowbugs	a.i./A	acre	per 1000 sq.ft.

In New York State, this product may NOT be applied to any grass or turf area 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 BIFENTHRIN 0.2%G GC if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

¹ **Armyworms, Cutworm, and Sod Webworm** – Immediately after application irrigate with up to 0.1 inches of water in order to release the insecticide from the granule.

² **Annual Bluegrass Weevil (*Hyperodes*) (adult)**: Time applications to control adult insects as they move from over-wintering sites and to grass areas. Movement generally starts when *Forsythia* is in full bloom and ends when flowering dogwood is in full bloom. Consult your State Cooperative Extension Service for more information.

³ **Billbug (adult)**: Apply when adult insects are first observed (April and May). Degree-day models are available to determine best application timing. Spring applications will also control over-wintered chinch bugs in temperate regions. Consult your State Cooperative Extension Service for information.

⁴ **Black Turfgrass Ataenius (adult)**: Apply during May and July for control of the first and second generation of insects. Apply in May when Vanhoutte spiraea and horse chestnut are blooming. Apply in July when Rose of Sharon is blooming.

⁵ **Chinch Bug**: Immediately after application irrigate with up to 0.25 inches water in order to release the insecticide from the granule. To optimize treatment of the base of grass plants and the thatch area, where the insects are often located, irrigate the grass area before treatment. Chinch bugs are difficult pests to control in grasses, thus, higher application rates may be required during the summer when both nymphs and adults are present.

⁶ **Flea larvae**: Immediately after application irrigate with up to 0.5 inches water in order to release the insecticide from the granule. Flea larvae are known to develop in the soil in shaded areas that are accessible to animals (including pets).

⁷ **Imported Fire Ant**: To obtain the best result, combine broadcast applications (this will provide control of foraging workers and newly mated fly-in queens) with mound drenches (this will eliminate existing colonies). When the soil is dry, irrigate before application or use a high volume application. For broadcast treatments, apply up to 0.4 lb ai/A. Mounds should be treated either by diluting 1 teaspoon of Bifenthrin Pro Multi Insecticide (EPA Reg. No. 51036-392) formulation per gallon of water and applying 1 to 2 gallons of finished spray per mound, or by applying 1/2 cup of BIFENTHRIN 0.2%G GC. If BIFENTHRIN 0.2%G GC is used, drench the mound with 1 to 2 gallons of water. Spray with sufficient force to break the mound apex and allow the insecticide solution to flow into the ant tunnels. In addition, treat the four foot diameter circle surrounding each mound. For optimal control, treat in cool weather (65 - 80°F) or in early morning or late evening hours.

⁸ **Mole Cricket (adult)**: Apply as late in the day as possible. If the soil is dry, irrigate before application to bring the insects closer to the soil surface (maximizing contact with the product). Immediately after application, water in with up to 0.5 inches of water. Treat grassy areas that receive pressure from adult mole crickets at peak egg hatch for best control of subsequent nymph populations (see below).

⁹ **Mole Cricket Nymph**: Apply as late in the day as possible. If the soil is dry, irrigate before application to bring the insects closer to the soil surface (maximizing contact with the product). Immediately after application, water in with up to 0.5 inches of water. Treat grassy areas that received intense adult mole cricket pressure in the spring immediately prior to peak egg hatch. Higher application rates and more frequent applications may be required to control larger nymphs later in the year.

When treating perimeters of structures, make the application to the ground from 5-10 feet adjacent to the structure.

8/9

For Perimeter Applications:

Appl. Rate: Lbs./ 1,000 sq.ft.	Band Width In Feet	Lbs. of BIFENTHRIN 0.2%G GC/ Linear Distance (Feet) Around Structure							
		100	150	200	250	300	400	500	1,000
2.3	5	1.3	1.9	2.5	3.0	3.6	4.8	5.9	11.7
2.3	10	3.0	4.2	5.3	6.5	7.6	9.9	12.2	23.7
3.0	5	1.7	2.5	3.3	3.9	4.7	6.3	7.7	15.2
3.0	10	3.9	5.4	6.9	8.5	9.9	12.9	15.9	30.9
3.5	5	2.0	2.9	3.8	4.5	5.4	7.2	8.9	17.5
3.5	10	4.5	6.3	8.0	9.8	11.4	14.9	18.3	35.5
4.6	5	2.6	3.8	5.0	6.0	7.2	9.6	11.8	23.4
4.6	10	6.0	8.4	10.6	13.0	15.2	19.8	24.4	47.4

NOTE: This table provides BIFENTHRIN 0.2%G GC amounts which include the total area to be treated. This area includes the area of a circle whose radius is the bandwidth (this accounts for the area treated at the four corners of the structure) plus the linear distance treated times the bandwidth.

APPLICATION TO INDUSTRIAL NON-AGRICULTURAL SITES
(Such as Industrial Sites, Ball Fields, Parks and Cemeteries)

BROADCAST SPOT APPLICATIONS: To control actively foraging ants (including Imported Fire Ants) uniformly broadcast 2.3 to 4.6 lbs. BIFENTHRIN 0.2%G GC per 1000 sq. ft. (this rate is equivalent to 0.2 to 0.4 lbs. a.i./Acre). Additional rate recommendations can be found in the footnotes in the Sod Application Section.

ELECTRICAL SITES (Pad Mounted): Apply 1 to one and one-half Tablespoons of BIFENTHRIN 0.2%G GC per 4 sq. ft of pad in order to reduce or prevent mound building activity by ants. Care must be taken to ensure that the product is evenly distributed. If the existing transformer is filled or partially filled with soil already excavated by ants the fill must be removed prior to application. Once the excess is removed, and prior to application, relevel the soil.

Best results are obtained by treatment in the early Spring or Fall as ants appear to be attracted to transformers in cooler months.

BIFENTHRIN 0.2%G GC - Recommended Spreader Settings for Broadcast Applications

EQUIPMENT TYPE USED FOR APPLICATION	GROUND SPEED (MPH)	SPREADER SETTING			
		100 LBS./ACRE		200 LBS./ACRE	
		ONCE OVER	TWICE OVER	ONCE OVER	TWICE OVER
Hand-Pushed					
Gandy Models (42,36,30,24")	3	12	10.5	16	12
LESCO Rotary	3	B + ¼	A + ½	C + ½	B + ¼
Scotts R-8A-1 Rotary	3	G	E	Use Not Recommended	G
Spyker (all Models)	3	2.6	2	3.1	2.6
Equipment Drawn (PTO=540 RPM)					
Gandy 10T Series	5.0	16.5	12	24	16.5
Gandy 6500 Series	4.5	15	11	20	15

9/9

EQUIPMENT TYPE USED FOR APPLICATION	GROUND SPEED (MPH)	SPREADER SETTING			
		100 LBS./ACRE		200 LBS./ACRE	
		ONCE OVER	TWICE OVER	ONCE OVER	TWICE OVER
Gandy Models (42, 36, 30, 24")	4.5	14	11.5	19	14
Herd GT-77	4.0	-	-	8-H	-
Herd GT-77	8.0	8-H	-	-	8-H
Lely 2.3202.000.1	4.5	2	1	3.5	2
Lely Model L- 400	4.5	Use Not Recommended	Use Not Recommended	2	Use Not Recommended
Vicon PS402	4.5	10	7	16	10
Vicon PS1002T	4.5	13	9	21	13

Equipment should always be calibrated for use prior to application. The settings recommended above represent starting points for final calibration. In order to insure continuing delivery of the correct amount of a BIFENTHRIN 0.2%G GC further adjustments to the settings should be made periodically during application. Consult the Owner's Manual of the equipment being used for calibration instructions.

Resistance: Repeated use of products for control of insect pests has been shown to cause resistance in some insects. BIFENTHRIN 0.2%G GC should be used in accordance with resistance management strategies appropriate for the local use area. For more information, contact local or state pest management authorities.

Adequate control may not be attained if resistance to this product or similar products (those with the same or similar modes of action) develops in your area. If poor performance is noted and cannot be explained by misapplication or weather extremes it is possible that a resistant strain of insect has developed. Consult with your pest management advisor or company representative for alternative control methods if you believe that a resistant strain may be present.

Dealers Should Sell in Original Packages Only.

CONDITIONS OF SALE AND WARRANTY

The **Directions For Use** of this product reflects the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of MICRO FLO COMPANY LLC ("MICRO FLO") or the Seller. All such risks shall be assumed by the Buyer.

MICRO FLO warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above.

MICRO FLO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT PERMITTED BY LAW, MICRO FLO AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. MICRO FLO and the Seller offer this product, and the Buyer and User accept it, subject to the foregoing **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of MICRO FLO.