

51036-394

9-23-2005

1/8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

September 23, 2005

Mr. Bill Washburn,
Regulatory Affairs Manager
Micro Flo Company, LLC
Memphis, TN 38117-2099

Subject: Revise labeling relative to copyright infringement
Bifenthrin 0.2%G PL Insecticide
EPA Reg. No. 51036-394
Your submissions dated June 07, 2005

Dear Mr. Washburn:

We have reviewed the above referenced submissions, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. The labeling is acceptable with the following comments:

- Under "Storage and Disposal", move the statement "*Open dumping is prohibited*" from the sub-heading "Pesticide Storage" to under "*Pesticide Disposal*".
- In the footnotes (pgs 3 & 4) under "Lawn Application" make the following corrections:
 - Footnote #5: Revise 1st and 2nd sentences to read: "Immediately following application, irrigate *treated area* with no . . . the product." and "*Use higher applications volume* if . . . relatively high.", respectively.
 - Footnote #6: Revise the 1st sentence to read: "*Use* a higher application volume when . . . into the soil."
- Under "Broadcast Applications: Recommended Spreader Settings" (pg 6 - footnotes), Make the following corrections:
 - Revise the 1st and 3rd sentences to read: "*Always calibrate equipment prior to application.*" and "*In order to . . . a Bifenthrin 0.2%G PL, make further adjustments to the settings from time to time during application.*", respectively.
- Make the following revisions under the sub-heading "Resistance" (pg 6):
 - Delete the phrase "*should be used*", thus revising the 2nd sentence to read "*Use bifenthrin 0,2%G PL in . . . resistance management*".
 - Replace the word "*may*" with "*will*" (2nd para., 1st line) in the statement "Adequate control may not . . . treatment area."

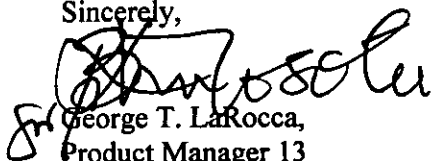
CONCURRENCES							
SYMBOL	2505C						
SURNAME	ACW/2005						
DATE	9/23/05						

OFFICIAL FILE COPY

- Revise the statement directly above "Conditions of Sale and Warranty" to read "Dealers must sell in original packages only" or "We recommend that dealers sell in original packages only".

Please make the above stated changes to the product's labeling and submit two copies of the revised final printed label to the Agency. Enclosed, please find a copy of the stamped label for your records. If you have any questions concerning this action, contact Dr. B. A. Akinlosotu at (703) 605-0653.

Sincerely,



George T. LaRocca,
Product Manager 13
Insecticide Branch
Registration Division (7505C)

enclosure:

3/8

BIFENTHRIN 0.2%G PL INSECTICIDE

For control of Insects, including mole crickets and imported fire ants, on lawns and perimeters around buildings (commercial, industrial, institutional, public and residential), parks and recreational areas, including athletic fields. For sale, use and storage by commercial applicators only.

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

FIRST AID

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 product is a pyrethroid. If large amounts have been ingested, the stomach and intestine should be evacuated. Treatment is symptomatic and supportive. Digestible fats, oils, or alcohol may increase absorption and so should be avoided.

HOTLINE NUMBER

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

EMERGENCY TELEPHONE NUMBERS:

(800) 424-9300 (CHEMTREC, transportation and spills)
(800) 832-HELP (1-800-832-4357)(human health)
(800) 345-4735 (ASPCA, animal health)

See other panels for additional precautionary information.

EPA Reg. No. 51036-394
AD xxxxxx

EPA Est. No. 51036-GA-001
NET CONTENTS:

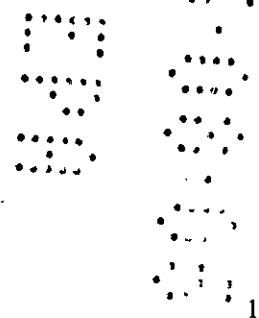
**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

SEP 23 2005

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.**

51036-394

Manufactured By:
MICRO FLO COMPANY LLC
P.O. BOX 772099
MEMPHIS, TN 38117



PRECAUTIONARY STATEMENTS

Hazards to Humans (and Domestic Animals)

Caution. Harmful if absorbed through skin. Avoid contact with skin, eyes or 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 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. This product is not intended for use for agricultural purposes, including private (non-commercial) greenhouses, etc.

This product may be used around residential structures such as apartments, condominiums, homes, outbuildings, and preschool and day care facilities. For each application at residential use sites, apply no more than 100 pounds of BIFENTHRIN 0.2%G PL (0.2 lb. active ingredient (a.i.)) per acre.

This product may be used at non-residential non-agricultural use sites, such as commercial, industrial, institutional or public buildings, parks and recreational areas, including athletic fields. For each application at non-residential use sites, apply no more than 200 pounds of BIFENTHRIN 0.2%G PL (0.4 lb. a.i.) per acre.

Per year, apply a maximum of no more than 200 lbs. BIFENTHRIN 0.2%G PL (0.4 lbs. a.i.) per acre.

Use of this product in commercial greenhouses or on golf courses, nurseries, sod farms or grass grown for seed is prohibited.

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 LAWNS AND PERIMETERS

LAWN APPLICATION: Use broadcast equipment designed to give consistent coverage of the area to be treated with BIFENTHRIN 0.2%G PL.

The following table provides recommended application rates of this product for control of the respective pests under normal conditions. However, for maximum control, this product can be applied at up to 0.4 lbs a.i./A (200 pounds per acre) to control the pests listed in the following table. When used on residential sites such as lawns, apply no more than 0.2 abs a.i./A (100 pounds per acre) per application.

PEST	ACTIVE INGREDIENT	APPLICATION RATE	
		BIFENTHRIN 0.2%G PL	
Armyworm ¹ Cutworm ¹ Sod Webworm ¹	0.1 lbs. a.i./A	50 lbs. per acre	1.15 lbs. per 1000 sq.ft.
Annual Bluegrass Weevil (<i>Hyperodes</i>) (Adult) ² Billbugs (Adult) ³ Black Turfgrass Ataenius (Adult) ⁴ Leafhopper Mealybug	0.1 - 0.2 lbs. a.i./A	50 - 100 lbs. per acre	1.15 - 2.3 lbs. per 1000 sq.ft.
Ants Centipede Chinch Bug ⁵ Flea (Larvae) ⁶ Flea (Adults) Imported Fire Ant (Adult) ⁷ Imported Fire Ant (Mounds) ⁷ Millipede Mole Cricket (Adult) ⁸ Mole Cricket (Nymph) ⁹	0.2 - 0.4 lbs. a.i./A	100 - 200 lbs. per acre	2.3 - 4.6 lbs. per 1000 sq.ft.
Pillbug Sowbug	0.4 lbs. a.i./A	200 lbs. per acre	4.6 lbs. 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 PL 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 following application, irrigate with no more than 0.4 inches of water in order to activate the product.

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 following application, irrigate with no more than 0.25 inches of water in order to activate the product. Higher volume applications ~~should be used~~ if the thatch layer is excessive or if grass height is relatively high. Chinch bugs are difficult pests to control in grasses; thus, higher application rates (up to 1 fluid oz. per 1000 sq. ft.) may be required during the middle of the summer.

⁶**Flea larvae:** A higher application volume ~~should be used~~ when treating the soil of shaded areas that are accessible to pets and other animals to ensure penetration of the product into the soil. If the lawn area is being treated at the rate of 0.25 fl. oz. per 1000 sq. ft. for adult flea control, the larval application rate should be two- to four-fold of this application volume.

⁷**Imported Fire Ant:** For best results, combine broadcast applications (to control foraging workers and newly mated fly-in queens) with mound drenches (to eliminate existing colonies). If the soil is dry, water before application or use a high volume application. For broadcast treatments, apply up to 0.4 lbs. a.i./A. Treat mounds by diluting 1 teaspoon of BIFENTHRIN 7.9% FL TC (EPA Reg. No. 51036-392) formulation per gallon of water and applying 1 to 2 gallons of finished spray per mound. 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.

PERIMETER APPLICATIONS

When treating perimeters of structures, apply to the ground in a band of 5-10 feet width around the structure.

Boundary Applications: Apply to ornamental gardens as well as the following areas: soil areas, pavement crevices, fencelines, planter areas, vegetation areas and mulch areas.

Appl. Rate: Pounds Per 1,000 sq. ft.	Band Width In Feet	Pounds of BIFENTHRIN 0.2%G PL for Perimeter Applications 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	35.9
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

PLEASE NOTE: In using the above chart, the listed amounts of BIFENTHRIN 0.2%G PL correspond to the total treatment area. This area includes (1) the area of a circle whose radius is the bandwidth (this corresponds to the area treated at the four corners of the structure) plus (2) the bandwidth multiplied by the linear distance treated.

FIRE ANT MOUND TREATMENT: To each mound apply ½ cup of Bifenthrin 0.2 %G PL. Following the application, drench with 1-2 gallons of water with sufficient force to break the mound apex and allow the insecticide solution to flow into the ant tunnels. For optimal control, treat in cool weather (65 - 80°F) or in early morning or late evening hours. Never use food utensils for food purposes after use with insecticide.

APPLICATION TO INDUSTRIAL NON-AGRICULTURAL SITES

This product may be applied to industrial non-agricultural sites, such as Ball Fields, Cemeteries, Industrial Sites, and Parks.

BROADCAST SPOT APPLICATIONS: Use a consistent broadcast application of 0.2 to 0.4 lbs. a.i./Acre (2.3 to 4.6 lbs. per 1000 sq. ft.) of this product for effective control of foraging ants, such as Imported Fire Ants. Additional recommendations for application rates can be found in the footnotes to the Lawn Application Section.

ELECTRICAL SITES (Pad Mounted): Apply 1.0-1.5 Tbsp. BIFENTHRIN 0.2%G PL per 4 sq. ft of pad for best control of ant mounds. Care must be taken to ensure that the product is evenly dispersed. If the electrical site is filled with soil previously excavated by ants, this soil must be removed prior to application. Once the soil has been removed, and prior to application, relevel the soil. For optimum control, make applications in the early Spring or Fall.

BROADCAST APPLICATIONS: RECOMMENDED SPREADER SETTINGS

SPREADER TYPE	GROUND SPEED (MPH)	SPREADER SETTING			
		APPL. RATE: 100 lbs./A		APPL. RATE: 200 lbs./A	
		ONCE OVER	TWICE OVER	ONCE OVER	TWICE OVER
Hand-Pushed					
LESCO Rotary	3	B + ¼	A + ½	C + ½	B + ¼
Gandy Models (42,36,30,24)	3	12	10.5	16	12
Scotts R-8A-1 Rotary	3	G	E	Not Rec.	G
Spyker (all Models)	3	2.6	2	3.1	2.6
Equipment Drawn (PTO=540 RPM)					
Gandy Models (42,36,30,24)	4.5	14	11.5	19	14
Gandy 6500 Series	4.5	15	11	20	15
Gandy 10T Series	5.0	16.5	12	24	16.5
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-	4.5	Not Rec.	Not Rec.	2	Not Rec.

400					
Vicon PS402	4.5	10	7	16	10
Vicon PS1002T	4.5	13	9	21	13

Always Calibrate

Equipment ~~should always be calibrated~~ for use prior to application. The settings recommended above represent initial settings for final calibration. In order to insure continuous delivery of the correct amount of a BIFENTHRIN 0.2%G PL, further adjustments to the settings ~~should be made~~ from time to time during application. Consult the Owner's Manual of the equipment being used for calibration instructions.

make

vpe

Resistance: Repeated use of certain insecticides may create resistance in some insects. BIFENTHRIN 0.2%G PL ~~should be used~~ in accordance with treatment area-appropriate strategies for resistance management. For further information regarding resistance management strategies for your treatment area, consult local or state pest management authorities.

Adequate control ~~may~~ *will* not be attained if resistance to this or similar products arises in the treatment area. If you are unable to attain adequate control and this result cannot be explained by misapplication or weather extremes, it is possible that a resistant type of insect has developed. Discuss alternative control techniques with your pest management advisor or company representative if it appears that a resistant insect type is present.

Dealers ~~Should~~ *must* Sell in Original Packages Only. *or We recommend that dealers Sell in*

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.

