



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

September 28, 2005

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

Subject: Amendment - Copyright infringement issues
Bifenthrin 0.2%G Nursery
EPA Reg. No. 51036-396
Your Letter Dated June 20, 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. Change the front panel statement as follows: "For Control of Imported Fire Ant in Balled and Containerized etc."
2. Delete the If Swallowed, If Inhaled and If in Eyes first aid statements since these exposure routes are in Toxicity Category IV. If you retain these then you need to add the appropriate precautionary statements under Hazards to Humans and Domestic Animals for Toxicity Category III exposures.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "BeWanda Alexander for".

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

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**BIFENTHRIN 0.2%G NURSERY
INSECTICIDE**

For Agricultural or Commercial Use Only

For Control of Imported Fire Ants and Balled and Containerized Nursery Stocks as a Quarantine Treatment

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. 51036-396
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 28 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
51036-396

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- 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.

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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

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

EMERGENCY NUMBERS:

- Transportation or spill, call CHEMTREC 800-424-9300.
- Human health, call Poison Control Center at 800-900-4044.
- Animal health, call ASPCA at 800-345-4735.

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.

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 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 to treated areas during the restricted entry interval (REI) of 12 hours.

EXCEPTION: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: 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, replace the container lid by thoroughly tightening the screw cap. In the event of a spill, confine the spill, avoid contact with the spilled product and evacuate the area, keeping all unprotected persons and animals at a safe distance.

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TO CONFINE SPILL: Cover to prevent dispersal. Place damaged package in a holding container. Identify 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 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.

USE RECOMMENDATIONS FOR ORNAMENTALS

For use by soil incorporation into potting media of containerized bushes, Christmas trees, conifers, flowers, nonbearing fruit and nut trees, ornamental trees, plants, and shrubs.

POTTING MEDIA APPLICATION INSTRUCTIONS: First, measure the dry weight of a unit volume of the mix to determine potting media bulk density. Then, completely mix the correct amount of BIFENTHRIN 0.2%G NURSERY insecticide, as necessary for the desired length of control, in equipment that will evenly distribute the product within the potting media. To ensure sufficient product mix distribution, a suitable quantity of sand (1:10) can be pre-mixed with BIFENTHRIN 0.2%G NURSERY.

BIFENTHRIN 0.2%G NURSERY insecticide is approved for use in connection with the USDA Imported Fire Ant Quarantine Program if the use complies with the USDA's guidelines. The following table provides recommended application rates based on the length of control required for certification.

Insect	USDA IFA Certification Period (months)	BIFENTHRIN 0.2%G Nursery Application Rate (ppm)	Potting Media Bulk Density*				
			(Lbs. of BIFENTHRIN 0.2%G Nursery/ Cubic Yard)				
			200	300	400	500	600
Imported Fire Ant	0 - 6	10	1.0	1.5	2.0	2.5	3.0
	7 - 12	12	1.2	1.8	2.4	3.0	3.6
	13 - 24	15	1.5	2.25	3.0	3.75	4.5
	Continuous	25	2.5	3.75	5.0	6.25	7.5

Comments: Per cubic yard of potting media, use a suitable quantity of BIFENTHRIN 0.2%G NURSERY insecticide based on the known bulk density.

GENERAL USE RECOMMENDATIONS FOR ORNAMENTAL PLANTS OUTSIDE OF USDA GUIDELINES

Use a 5 to 10 ppm application rate for Fungus Gnat larvae & Mealybugs. Use a 10 to 25 ppm application rate for Black Vine Weevil larvae, Imported Fire Ants, Root Weevil larvae, and White Grubs (i.e. European chafer larvae, Japanese Beetle, and oriental beetle). For longer residual control, the higher application rates should be used.

Insect	BIFENTHRIN 0.2%G Nursery Application Rate (ppm)	Potting Media Bulk Density*				
		(Lbs. of BIFENTHRIN 0.2%G Nursery/ Cubic Yard)				
		200	300	400	500	600
Fungus Gnat larvae	5	0.5	0.75	1.0	1.25	1.5
Mealybugs	10	1.0	1.5	2.0	2.5	3.0
Black Vine Weevil	10	1.0	1.5	2.0	2.5	3.0
Root weevil larvae	15	1.5	2.25	3.0	3.75	4.5
White Grubs	25	2.5	3.75	5.0	6.25	7.5
Imported Fire Ants						
Comments: Per cubic yard of potting media, use a suitable quantity of BIFENTHRIN 0.2%G NURSERY insecticide based on the known bulk density.						

*Lbs. BIFENTHRIN 0.2%G Nursery/Cubic Yard = $\frac{\text{potting media bulk density} \times \text{ppm}}{2000}$

Note: Bulk density is a laboratory determined dry weight amount of a unit volume of potting media.

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.