

Ann M. Tillman, Ph.D.
RohMid, LLC.
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Philadelphia, PA 19106-2399

JUN 19 2000

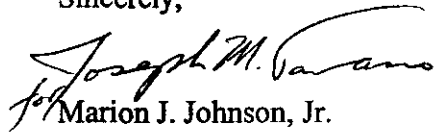
Subject: Amended Label for:
MACH 2 Plus Fertilizer (0.57% A.I.)
EPA Registration No. 69075-6
Application dated April 26, 2000

Dear Dr. Tillman:

The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide and Rodenticide Act, as amended revising the label regarding use of the product in the state of New York is acceptable subject to the comment listed below. A stamped copy of the accepted draft label is enclosed for your records.

Change the statement, "In The State Of New York, This Product May Be Used Only By Professional Applicators.", to read " In The State Of New York, New York State Requires That The Product Only Be Used By Professional Applicators.".

Sincerely,


Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division (7505C)

WPS USES

Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40CFR part 170) - in general, agricultural plant uses are covered - must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus 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.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standards (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handlers PPE requirements may be reduced or modified as specified in the WPS.

NON-WPS USES

Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40CFR part 170) - in general, only agricultural plant uses are covered by the WPS - must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

<p>USER SAFETY RECOMMENDATIONS</p> <p>Users should:</p> <ul style="list-style-type: none"> • 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.
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ENVIRONMENTAL HAZARDS

For terrestrial uses, 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 by cleaning of equipment or disposal of equipment wash waters.

This chemical has 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.

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 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 turf, plants, soil or water, is:

- Coveralls
- Waterproof gloves
- 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 Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry, well-ventilated area. Prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of reach of children.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your local State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA region office for guidance.

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

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED: Appropriate protective equipment must be worn when handling a spill of this material. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to **PRECAUTIONARY STATEMENTS** on label for hazards associated with handling of this material. Do not walk through spilled material. Dispose of pesticide as directed above. In spill or leak incidents, keep unauthorized people away.

IN CASE OF AN EMERGENCY ENDANGERING LIFE OR PROPERTY INVOLVING THIS PRODUCT, CALL DAY OR NIGHT 1-800-424-9300.

GENERAL INFORMATION

MACH 2™ PLUS FERTILIZER can be used as directed on any turfgrass site (lawns, sod, turf areas). Examples of such sites include, but are not limited to: 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, golf courses, and sod farms.

MACH 2 mimics the action of a natural insect hormone which induces the molting and metamorphosis process in insects. MACH 2 is highly active against grubs and lepidopterous larvae listed as target pests. MACH 2 controls listed larvae through a novel mode-of-action which starts within hours of ingestion. Actual death of larvae may take several days to occur.

USE RATE DETERMINATION

Carefully read, understand, and follow label use rates, recommendations and restrictions. Apply the amount specified with a properly calibrated fertilizer spreader. Check calibration periodically to ensure that equipment is working properly. Avoid overlaps that will increase rates above those recommended. Failure to follow the DIRECTIONS FOR USE and all precautions on this label may result in grass injury or poor pest control.

APPLICATION TIMING

The activity of MACH 2™ PLUS FERTILIZER is expressed following ingestion by the target larvae. Consequently the timing of application is dependent upon the feeding behavior of the target pest. Consult your local State Extension Specialists for more specific information regarding timing of applications.

To achieve optimal effectiveness, the following turf management practices are suggested:

- Minimize thatch since heavy thatch will prevent the insecticide from penetrating to the area where insects are feeding.
- Make applications prior to egg hatch or when larvae are small and actively feeding (Late spring through mid summer).
- MACH 2™ PLUS FERTILIZER is not dependent upon immediate irrigation for activation, however, water must transport the material through the thatch. Under conditions of drought it is recommended to water in MACH 2 PLUS FERTILIZER.

USE DIRECTIONS FOR TURFGRASS		
PEST	Amount of MACH 2™ PLUS FERTILIZER	COMMENTS
Lepidoptera larvae such as: larvae of cutworms, sod webworms, armyworms, fall armyworms	174 lbs./Acre (4.0 lb./1,000 sq. ft.)	Apply at first sign of pest damage. A single repeat application can be made if needed.
White grub larvae such as: Japanese beetle, <i>Popillia japonica</i> Northern masked chafer, <i>Cyclocephala borealis</i> Southern masked chafer, <i>Cyclocephala lurida</i> May/June beetle, <i>Phyllophaga</i> spp. Black turfgrass ataenius, <i>Ataenius spretulus</i> Green June beetle, <i>Cotinus nitida</i> Annual bluegrass weevil larvae, <i>Hyperodes</i> spp. Billbugs, <i>Sphenophorus</i> spp. Aphodius beetle, <i>Aphodius</i> spp.	261 lbs./Acre (6.0 lbs./ 1,000 sq. ft.)	MACH 2 PLUS FERTILIZER may be used as either a preventative or an early curative treatment (see application timing instructions). Make only one application.
White grub Larvae such as: European chafer, <i>Rhizotrogus majalis</i> Oriental beetle, <i>Exomala orientalis</i>	261-348 lbs/Acre (6.0-8.0 lb/1000 sq.ft)	MACH 2 PLUS FERTILIZER may be used as either a preventative or an early curative treatment (see application timing instructions). Make only one application.

Do not apply more than 348 lbs. (2 lbs. active ingredient) per acre per year regardless of pests controlled.

FOR SOD FARMS: Allow at least 7 days to elapse between last application and harvest of sod.

Use of this product on "Tifdwarf" Bermudagrass greens may result in short term discoloration of the turfgrass. Since, many agronomic factors may influence this response it is recommended that users treat a small area at recommended rates prior to initiating large-scale use.

**Suggested Spreader Settings
(Calibration Gauge setting Number)**

Recommended rates in lbs/1000 sq.ft

SPREADER TYPE	2.7	4.0	5.4	PATTERN SETTING
LESCO rotary	X	X	X	X
Scott Rotaries (R-7, R-7X)	X	X	X	X
Scott Rotaries R-8, R-8A, SR-1	X	X	X	X
Cyclone	X	X	X	X
Spyker	X	X	X	X
Vicon	X	X	X	X
Lely	X	X	X	X

Apply MACH 2 Plus Fertilizer with a drop or rotary spreader designed to apply granular insecticides. Avoid the use of spreaders that would apply this product in narrow rows or concentrated bands. Calibrate the spreader according to the manufacturers' directions for adjusting the spreader settings such that the spreader delivers the appropriate application rate recommended above. Apply this product uniformly over the lawn or ornamental turf area. A more uniform application can be made by spreading half the required amount over the area and then applying the remaining half at a right angle to the previous direction. Avoid streaking, skips, or overlaps during application.

DISCLAIMER

The label instructions for use of this product reflect 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 the use or application of the product contrary to label instructions, all of which are beyond the control of RohMid L.L.C.. All such risks shall be assumed by the user.

RohMid L.L.C. warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the directions for use, subject to the risk referred to above.

Any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values or any other special or indirect damages.

RohMid L.L.C. makes no other express or implied warranty, including other express or implied warranty of FITNESS or of MERCHANTABILITY.

A Product of
RohMid L.L.C.
 One Campus Drive
 Parsippany, NJ 07054

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