

72155-31

10/6/2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Gregory C. Mattern
Bayer Advanced
2 T.W. Alexander Dr.
P.O. Box 12014
Research Triangle Park, NC 27709

OCT 6 2010

Dear Mr. Mattern:

Subject: Labeling Amendment; Addition of Alternate Application Rate
0.15% Imidacloprid + 0.05% Beta-Cyfluthrin Granular Insecticide
EPA Registration No. 72155-31
Date Submitted: May 14, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

1. A number of marketing claims on the first page of the label require the addition of the word "*listed*". Included below is a list of claims that require revision. Please note that the word "*listed*" may appear as a footnote on the same page as the claim.
 - a. revise "*Controls pests above ground or below ground*" to read "*Controls listed pests above ground or below ground*"
 - b. revise "*Kills Nuisance Pests Outdoors*" to read "*Kills Listed Nuisance Pests Outdoors*"
 - c. revise "*Kills Below Ground Outdoor Pests Like White Grubs*" to read "*Kills Listed Below Ground Outdoor Pests Like White Grubs*"
 - d. revise "*2-Way Dual Action* - Kills Soil and Surface Insects*" to read "*2-Way Dual Action* - Kills Listed Soil and Surface Insects*"
 - e. revise "*Kills Lawn Pests*" to read "*Kills Listed Lawn Pests*"
 - f. revise "*Kills surface pests in 24 hours (at 2 lb/1,000 sq. ft. rate)*" to read "*Kills listed surface pests in 24 hours (at 2 lb/1,000 sq. ft. rate)*"
2. On page one of the label, delete the claim "*Kills Bugs (Insects) At Every Level*". Alternatively, the claim may be revised to read "*Kills Listed Bugs (Insects) Above and Below Ground*".
3. On page one of the label, delete the following marketing claims:
 - a. "*Kills surface insects in 24 hours*"
 - b. "*Fast Acting Granules (Kills listed bugs at every level) (Kills listed bugs Above &*

Below ground)"

4. On page two of the label, revise the claim "*Kills White Grubs Early, Before They Damage the Lawn*" to read "*Kills White Grubs Early*". Alternatively, the claim may be deleted.
5. On page three of the label, revise "*For best results, be sure to read and follow all label directions.*" to read "*Before use, read and follow all label directions.*"
6. On page three of the label, directly above the bullet "*Do not apply near fish pools, ponds, streams or lakes.*", add the header "***Restrictions:***". Alternatively, all of these restrictions may be added to the "***APPLICATION RESTRICTIONS***" section of the label (page 4).
7. On page 5 of the label, revise "***Storage Conditions:***" to read "***Pesticide Storage:***". In addition, revise "***Disposal:***" to read "***Pesticide Disposal:***".

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415 or davis.kable@epa.gov.

Sincerely,



Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure- Stamped Label

3098

0.15% Imidacloprid + 0.05% Beta-Cyfluthrin Granular Insecticide

For Use on: Lawns, Ground Covers, Flower Beds, Around Trees & Shrubs, and Around Homes

- READY TO USE
- KILLS LISTED INSECTS
- KILLS ANTS
- KILLS GRUBS
- [insert trademark]™ formula
- [insert trademark]™ technology
- Creates long-lasting kill zone
- Controls pests above ground or below ground (from the grass to the roots/top to bottom)
- Systemic Action (systemic protection) for protection
- Long-Lasting – up to 90-Day Subsurface Insect Protection
- Up to 90 Day grub Protection
- 3-Month Soil Insect Protection
- Long-Lasting Protection
- Effective Home Barrier Treatment
- Kills Nuisance Pests Outdoors
- Kills Listed Above Ground Outdoor Pests
- Kills Below Ground Outdoor Pests Like White Grubs
- Kills Ants
- Protects your lawn from top to bottom
- Kills Bugs (Insects) At Every Level
- 2-Way Dual Action* – Kills Soil and Surface Insects
- Works 2 ways to control insects*
- Combo Product*
- Insect Control – Listed Surface and Soil Insects
- Kills Listed Bugs (Like Scorpions, Mole Crickets, and Ants)
- Stops and Prevents Insect Damage
- One Step (Lawn) Insect Protection
- Kills Listed Insects Above and Below Ground
- One Application Keeps on Killing (Working) for Weeks
- Guaranteed Results
- Kills 30+ Listed Outdoor Pests in Lawns &

- Around Home
- Kills Lawn Pests
- Kills White Grubs and Mole Crickets
- One Application Kills White Grubs
- Kills White Grubs Early
- One Application Stops/Kills Grubs
- Contains Merit® and Tempo Ultra®
- Sprinkle On Ant Mound and Walk Away
- Even Effective/Works in the Rain
- Long Lasting...Keeps on Killing for Weeks
- Also stops spiders, ticks, fleas, cockroaches and other listed pests
- Fast Acting Granules (Kills listed bugs at every level) (Kills listed bugs Above & Below ground)
- 100% Satisfaction Guaranteed
- Highly Effective Systemic Protection
- Kills surface insects in 24 hours
- Kills surface pests in 24 hours (at 2 lb/1,000 sq. ft. rate)
- Kills listed soil insects for up to 3 months
- 20% more vs. 10 lb size (12 lbs)
- Treats up to 10,000 sq. ft. (10 pound size)
- For Ants, Fleas, and Ticks
- For Ants, Fleas and Ticks - Covers up to 10,000 sq. ft. (10 pound size)
- Covers 5,000 sq. ft. (all pests) (10 pound size)
- Kills listed surface pests in lawn, landscape, and around home

*contains both contact and systemic insecticides

[The word "listed" can appear as a footnote on the same page as the claim with the appropriate phrase, such as *listed insects]

ACTIVE INGREDIENT:

Imidacloprid0.15%

Beta-Cyfluthrin0.05%

OTHER INGREDIENTS*0%

ACCEPTED
with COMMENTS

In EPA Letter Dated:

Net Contents: 10 lbs, 12 lbs, 20 lbs, 30 lbs.

OCT 6 2010

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional Precautionary statements

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

72155-31

Not for sale, sale into, distribution and or use in Nassau, Suffolk, Kings, and Queens counties of New York.

[] Information is optional

40x8

[BACK PANEL]

This product contains Bayer's proprietary 2-way action [insert trademark TM] Granules (formula)*. Bayer Advanced's 2-way action controls turf pests like ants fleas, and ticks plus soil pests like grubs in one easy step. It not only kills existing listed soil pests, but also keeps on protecting for up to 90 days. Keeping the yard, lawn, and around your home free of listed nuisance pests has never been easier.

READ THE LABEL FIRST!

QUICK FACTS <ul style="list-style-type: none"> • Kills listed Insects both Above & Below Ground • Controls existing populations plus keeps on preventing new soil infestations for up to 90 days • Kills Listed Pests Outdoors in Lawns, Ground Covers, Flower Beds, Around Trees & Shrubs, and Around Homes • Kills White Grubs Early, Before They Damage the Lawn • One Application Kills White Grubs • For Use With Lawn or Hand-held Spreaders • Convenient, Ready to Use Shaker Bottle • Kills Ants Outdoors in Lawns and Around Homes • Effective as a Spot Treatment for Ant Mounds • Kills Fire Ants -Results in 3 Days • Easy-To-Use Granules 		
KILLS	Annual Bluegrass weevil (hyperodes weevil) Ants Armyworms Billbugs Black turfgrass Ataenius Centipedes Chiggers Chinch Bugs Cockroaches Crickets Cutworms Digger wasps (Cicada killer) Earwigs European crane fly Larvae Fire Ants Fleas Grasshoppers Leafhoppers Mealybugs	Millipedes Mole Crickets Mosquitoes Pillbugs Scorpions Sod webworms (lawn moths) Sowbugs Spiders Termites* Ticks (including deer ticks) White Grubs (including larvae of Asiatic Garden Beetle, Black Turfgrass Ataenius, Chafers, Japanese Beetle, May or June Beetle, and Oriental Beetle)
COVERAGE	Covers up to 10,000 sq ft (10 pound size). For Ants, fleas, and ticks. Covers up to 5,000 sq. ft. for all others (10 pound size).	
WHERE TO USE	Lawns, Ground Covers, Flower Beds, Around Trees & Shrubs, and Around Homes	
WHEN TO USE	Surface Pests: Whenever insects are present White Grubs: May thru July European crane fly larvae: Apply once, when adult insects are present in large numbers.	
HOW MUCH TO USE	See directions	
	For questions or comments, call toll-free 1-877- BayerAG (1-877-229-3724)	

FOR OUTDOOR RESIDENTIAL USE


DIRECTIONS FOR USE continued	
TO CONTROL LISTED PESTS IN AND AROUND THE LAWN	
HOW TO USE	<p>PESTS</p> <p>Annual Bluegrass weevil (hyperodes weevil)</p> <p>Ants</p> <p>Armyworms</p> <p>Billbugs</p> <p>Black Turfgrass Ataenius</p> <p>Chiggers</p> <p>Chinch Bugs</p> <p>Cutworms</p> <p>European crane fly Larvae</p> <p>Fleas</p> <p>Grasshoppers</p> <p>Leafhoppers</p> <p>Mealybugs</p> <p>Mole Crickets</p> <p>Mosquitoes</p> <p>Sod Webworms (lawn moths)</p> <p>Ticks (including deer ticks)</p> <p>White Grubs (including larvae of Asiatic Garden Beetle, Black Turfgrass Ataenius, Chafers, Japanese Beetle, May or June Beetle, and Oriental Beetle)</p>
	<p>HOW MUCH TO APPLY</p> <p>Apply 1 to 3 lbs per 1000 sq ft - ants, fleas, and ticks , Apply 2-3 lbs per 1,000 sq ft (This bag covers up to 10,000 sq ft) (10 pound size)</p> <p>Adjust your spreader to the proper setting. See the following table.</p> <p>This bag covers 10,000 sq ft (10 pound size) which is the same as a lawn 100 feet wide and 100 feet long.</p>
	<p>HOW TO APPLY</p> <p>Use rotary or drop type spreaders to apply granules evenly over the lawn, flower beds, ground covers, and around trees/shrubs. To be sure you cover lawn areas uniformly, first treat the border of the lawn then fill in the center. Make parallel passes, walking at a steady pace to ensure even distribution of the granules.</p> <p>Water thoroughly within a day after applying.</p> <p>TIP: For best control of white grubs, mole crickets, and European crane flies apply just before egg hatch. Contact your County Extension Agent for the ideal dates to apply in your area.</p>
	<p>PEST</p> <p>Fire Ants</p>
	<p>HOW MUCH TO APPLY</p> <p>¼ cup per mound</p>
	<p>HOW TO APPLY</p> <p><u>Fire Ant Mounds</u></p> <p>Sprinkle evenly over mound. Treat new mounds as they appear.</p>
APPLICATION RESTRICTIONS	<p>Apply this product directly to the lawn or garden area. Water treated area as directed on this label. Do not water to the point of run-off.</p> <p>Do not make applications during rain.</p> <p>Do not mow until the granules are thoroughly watered in.</p> <p>Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.</p>
FOR BEST RESULTS	<p>Water in thoroughly after applying.</p> <p>To prevent pest damage, apply this product early--when pests are still young and easier to kill.</p> <p>For control of European crane fly larvae apply 3 lbs per 1,000 sq ft.</p> <p>Also, for improved and extended protection against all pests, apply at the high rate of 3 lbs per 1,000 sq ft.</p>

SPREADER SETTINGS

If your spreader is not listed, please call our Consumer Service Hotline toll-free (877) 229-3724 for help.

Rate: 2 to 3 lbs per 1,000 sq ft

SPREADER	SETTING* to deliver 1 lb, 2 lbs or 3 lbs per 1,000 sq ft
Vigoro Drop Vigoro Rotary Sta-Green Drop Sta-Green Rotary Bandini Ev-N-Spread Rotary Ortho Drop Ortho Rotary Precision Drop Precision Rotary Quaker Rotary Republic EZ Drop Republic EZ Grow Republic EZ Rotary Scotts Drop Scotts Accugreen Scotts Easygreen Scotts Evengreen Scotts Speedy Green True Temper Rotary ADD: NEW TWO-IN-ONE SPREADERS	To be determined.
<ul style="list-style-type: none"> • Settings are approximate. The condition of your spreader, the speed at which you walk and uneven terrain may affect the rate of application. Calibrate your spreader according manufacturer's directions. • Tip: 1000 sq ft = 20 ft x 50 ft • Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Be sure the spreader works properly and spreads granules evenly. 	

IMPORTANT: Directions for Storage and Disposal	
Storage Conditions:	Store in original container in a cool, dry place, out of the reach of children, preferably in a locked storage cabinet.
Disposal: 	If empty: Non-refillable container. Do not refill or reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-877-229-3724 for disposal instructions. Never place unused product down any outdoor or indoor drain.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS	
CAUTION <ul style="list-style-type: none"> • Harmful if swallowed, inhaled or absorbed through skin. • Causes moderate eye irritation. • Avoid contact with skin, eyes or clothing. • Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. • Remove contaminated clothing and wash clothing before reuse. 	

8048

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If Inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice
If on Skin or Clothing	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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.
NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. You may call toll-free 877-229-3763 for medical emergency information. Active Ingredient: 0.15% Imidacloprid [CAS # 138261-41-3] and 0.05% Beta-Cyfluthrin [CAS # 68359-37-5].	

ENVIRONMENTAL HAZARDS
<ul style="list-style-type: none"> • This pesticide is toxic to fish. • To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems. • Apply this product only as specified on this label.

NOTICE
Research and testing have determined that the "Directions for Use" are appropriate for the proper use of this product under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.



A Business Unit of Bayer CropScience LP
 P.O. Box 12014, 2 T.W. Alexander Drive
 Research Triangle Park, North Carolina 27709

0.15% Imidacloprid + 0.05% Beta-Cyfluthrin Granular Insecticide (PENDING) 07/07/09, Resubmitted 05/04/10, Resubmitted 10/04/10