

72155-33

11/30/2005

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

NOV 30 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Charles W. Boyd
Registration Manager
Bayer CropScience
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Subject: Label Amendment: Add pests including the public health pests Ants, Scorpions and Ticks.
Dylox Grub Control Insecticide .
EPA Reg. No. 72155-33
Resubmission dated August 31, 2005 to November 30, 2004

Dear Mr. Boyd:

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

- 1) **Nothing works faster on grubs and nothing kills grubs faster** must be deleted from the label.
- 2) The disclaimer excluding fire ants, carpenter ants harvester ants and pharaoh ants should be placed under the list of pests on the front panel for higher visibility.
- 3) Other ingredients-plural (not singular) since more than one "other ingredients" in the formulation.

A stamped copy "accepted with comments" of the label is enclosed for your records. Please submit two (2) copies of the final printed before shipment. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink that reads "Akiva Abramovitch".

Akiva Abramovitch, Ph.D.
Chemist
Insecticide-Rodenticide Branch
Registration Division (7505C)

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[FRONT PANEL]

Dylox[®] Grub Control Insecticide

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

NOV 30 2005

READY-TO-USE

FOR OUTDOOR RESIDENTIAL USE

DYLOX is a fast-acting insecticide which kills:

- white grubs,
- mole crickets,
- Other Lawn Pests including Ants*, Armyworms, Chinch Bugs, Crickets, Cutworms, Earwigs, European Crane Flies, Grasshoppers, Leafhoppers, Millipedes, Pillbugs, Scorpions, Sowbugs, sod webworms, and ticks.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 72155-33

For Use On: Lawns

- Kills Grubs within 24 hours
- Delivers Overnight Results
- Nothing Kills Grubs Faster
- Stops Grubs From Further Damaging Lawn
- For Use After First Signs of Grubs
- Degrades Quickly – Does Not Linger
- Also Controls Ants*, Armyworms, Chinch Bugs, Crickets, Cutworms, Earwigs, European Crane Flies, Grasshoppers, Leafhoppers, Millipedes, Mole Crickets, Pillbugs, Scorpions, Sowbugs, sod webworms, and Ticks.
- Contains Dylox
- Nothing works faster on grubs - overnight results
- Degrades quickly - will not linger
- Also kills Ants*, Armyworms, Chinch Bugs, Crickets, Cutworms, Earwigs, European Crane Flies, Grasshoppers, Leafhoppers, Millipedes, Mole Crickets, Pillbugs, Scorpions, Sowbugs, sod webworms, and Ticks.

ACTIVE INGREDIENT:

Trichlorfon 6.2%

OTHER INGREDIENT:

93.8%

Net Weight: ___ Pounds

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for precautionary statements

First Aid +

Organophosphate Insecticide

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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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.
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 preferable mouth to mouth, if possible. • Contact poison control center or doctor for further 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 (877) 229-3763 for medical emergency information. Active Ingredient: Trichlorfon [CAS # 52-68-6]

Note to Physician: Trichlorfon is an organophosphate. Prolonged exposure will cause cholinesterase depression. Atropine Sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

Environmental Hazards

- This pesticide is toxic to fish, bird and wildlife. Do not apply directly to water.
- Do not contaminate water when cleaning equipment or disposing of equipment wash water.
- Apply this product only as specified on this label.

DIRECTIONS FOR USE

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

For best results, read and follow all label directions.

BEFORE YOU USE

Read and follow these directions when using:

- Do not apply near fish pools, ponds, streams or lakes.
- Do not apply to waterlogged soil.
- Do not apply with hand-held or chest mounted spreader.
- Water grass as soon as possible after application to move product to root zone where insects feed.
- Do not allow children or pets on treated lawn until grass has been watered and allowed to dry.



Children and pets may re-enter only after the treated area has been watered and allowed to dry.

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DIRECTIONS FOR USE (continued)	
HOW TO USE	
TO CONTROL	WHEN TO APPLY
GRUBS	Apply when grubs are present
MOLE CRICKETS	Apply when mole crickets are present
OTHER LAWN PESTS	Apply when insects or damage first appear.
LAWNS	How Much: See Spreader Settings
	Adjust spreader to the proper setting (see Spreader Settings). (ART)
	To be sure you cover the entire area 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. (ART)
	Water thoroughly after applying. (ART)
FOR BEST RESULTS	<ul style="list-style-type: none"> • The best time to kill grubs is July through September, when they are young and actively feeding near the soil surface. • Water thoroughly within 24 hours after applying. • Do not mow until the granules are watered into the soil. • Avoid applying DYLOX Grub Control Insecticide to waterlogged areas, as this may decrease the product's effectiveness. • You may spread DYLOX Grub Control Insecticide over soil or mulch. If present, remove weed barrier before applying.
SIGNS OF DAMAGE TO LAWNS	
GRUBS	White grubs cause extensive damage to lawns by feeding on grass roots. Grass turns yellow, then brown and dies. Grubs chew off roots so that the grass is easily pulled up in pieces with your hands. You can roll it back like a carpet to reveal the grubs. If patches of dead grass appeared in your lawn late last summer, check for grubs.
MOLE CRICKETS	Mole crickets often cause extensive damage by tunneling through lawns. Some species also feed on roots. Tunneling uproots the grass so it easily dries out. Lawns turn yellow, become thin, weedy and can eventually die.
OTHER LAWN PESTS	Armyworms, Sod webworms and cutworms damage lawn by cutting blades of grass near the ground. Small brown patches will appear. Other lawn pests chew or suck on grass which may cause grass to be weakened or look poorly. Other lawn pests can be a nuisance outdoors.
HOW IT WORKS	DYLOX Grub Control Insecticide is intended to be used when insects and grubs are present. After granules are watered in, insects are killed on contact. The active ingredient then degrades quickly.

Spreader Settings

If your spreader is not listed, please call our Consumer Service Hotline toll-free (877) 229-3725 for help.

Rate for Grubs and Mole Crickets: 3 lbs per 1,000 sq ft

Rate for Other lawn pests including Ants*, Armyworms, Chinch Bugs, Crickets, Cutworms, Earwigs, European Crane Flies, Grasshoppers, Leafhoppers, Millipedes, Mole Crickets, Pillbugs, Scorpions, Sowbugs, sod webworms, and Ticks: 2 lbs per 1,000 sq ft

SPREADER	SETTING*	
	To Deliver	To Deliver
	3 lbs per 1,000 sq ft	2 lbs per 1000 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	Spreader settings to be determined.	Spreader settings to be determined.

* 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 to 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

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

STORAGE CONDITIONS: Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

DISPOSAL  **If Empty:** Do not reuse this container. Place in trash or offer for recycling if available.
If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines.

*Ants except Carpenter Ants, Fire Ants, Harvester Ants, and Pharoah Ants.

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NOTICE
Research and testing has determined that the "Directions for Use" are appropriate for the proper use of DYLOX Grub Control Insecticide 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.

Bayer Advanced

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

Dylox Grub Control (PENDING) Submitted 11/29/05