



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 2, 2016

Karen Shearer
Registrations Manager
Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Subject: Label Amendment – Adding rate restriction and bee language, revising claims, changing name of product from Merit Concentrate to Imidacloprid Concentrate
Product Name: Imidacloprid Concentrate Insecticide II
EPA Registration Number: 72155-51
Application Date: 6/21/2016
Decision Number: 519192

Dear Ms. Shearer:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

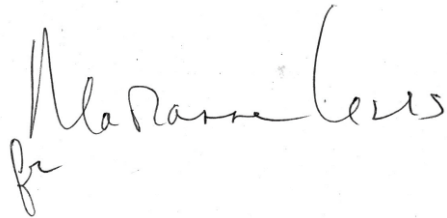
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false

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or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Marianne Lewis by phone at (703) 308-8043, or via email at lewis.marianne@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Marianne Lewis" with a small "for" written below the name.

Venus Eagle, Product Manager 01
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

ACCEPTED

Dec 02, 2016

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72155-51

[Front Panel]

Imidacloprid Concentrate Insecticide II

(ABN: Bayer Advanced Season-Long Grub Control Ready-to-Spray)

Kills White Grubs, Mole Crickets and European Crane Fly Larvae

For Use On: Lawns

READY TO SPRAY

CONCENTRATE

- One application kills white grubs, mole crickets and European Crane Fly Larvae all season long
- Apply Anytime...Spring Through Late Summer
- Stops Grubs from Destroying Your Lawn
- Treats 5,000 sq ft
- Season Long, Effective Protection
- Grubs and other listed insects can cause extensive damage to lawns by feeding on grass and its roots. Imidacloprid Concentrate Insecticide II [or other EPA-accepted alternate brand name for that product] [kills][controls] listed insects and prevents damage.
- One Application Kills Grubs All Season Long
- Season-Long Grub Control
- Protects Against Grubs All Season Long
- Kills white grubs, mole crickets and European Crane Fly Larvae early, before they damage your lawn
- Kills mole crickets and European Crane Fly Larvae
- Kills grubs season-long with 1 application
- Also kills mole crickets & European crane fly larvae
- Easy hold
- EZ Spray
- One-touch sprayer
- EZ grip
- Ergo grip
- Simple spray
- EZ grip
- One touch
- Spray n go
- Thumb switch
- Handy spray
- EZ touch
- One-touch application

ACTIVE INGREDIENT:

Imidacloprid..... 1.47%

OTHER INGREDIENTS: 98.53%

TOTAL: 100.00%

Net Contents: 32 fl oz (946 mL)

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel Booklet for Directions for Use and Precautionary Statements

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

+ **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 by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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.

NOTE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For medical emergency information, you may call toll-free 1-877-229-3763.
Active Ingredient: 1.47% Imidacloprid [CAS # 138261-41-3]

[BACK PANEL]


Imidacloprid Concentrate Insecticide II kills grubs all season long with a single application. Keeping your lawn free of damaging grubs has never been easier.

READ THE LABEL FIRST!

QUICK FACTS

- Ready-To-Spray...No Mixing, No Measuring
- Kills white grub, mole crickets, and European crane fly larvae early, before they damage the lawn
- Just one application stops mole crickets, European crane fly larvae and white grubs

[Note to PM: Other marketing claims from above list may be used in this section]

KILLS	(ART: white grub) Adelgids Annual bluegrass weevil Aphids Billbugs Bluegrass Weevils Elm leaf beetle European crane fly larvae Lacebugs	Leafhoppers Leafminers Mealybugs Mole crickets Sawfly larvae Thrips White Grubs (including larvae of Asiatic Garden Beetle, Black Turfgrass Ataenius, Chafers, Japanese Beetle, May or June Beetle, and Oriental Beetle) Whiteflies
COVERAGE	This bottle covers 5,000 sq ft	
WHERE TO USE	Lawns	
WHEN TO USE	May through mid-August	
HOW MUCH TO USE	No measuring needed. Dilutes automatically.	
	For questions or comments, call toll-free (1-877-229-3724) 1-877-BayerAG or visit our website at www.bayeradvanced.com	

RESTRICTION: FOR OUTDOOR RESIDENTIAL USE ONLY

EPA Reg. No. 72155-51

EPA Est. No. XXXX-AA-XX

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

- Harmful if swallowed
- Causes eye irritation.
- Avoid contact with skin, eyes, or clothing.
- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

- This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to lakes, streams or ponds.
- 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.
- This pesticide is highly toxic to bees. Do not apply this product or allow it to drift to blooming crops or weeds if bees are foraging the treatment area

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
Read and follow all label directions.

Restrictions:

- For outdoor residential use only.
- Do not spray the product into fish pools, ponds, streams, or lakes.
- Remove animal feeding dishes prior to application.
- Do not apply to fruits or vegetables used for food.
- Do not apply more than once per year.
- Do not apply more than 0.4 lb of active ingredient [x bottles] per acre per year. This bottle contains [X] lbs of imidacloprid.



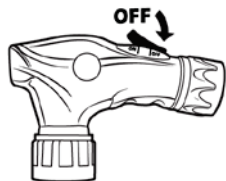
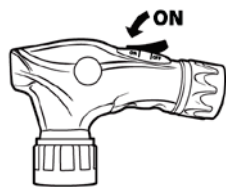
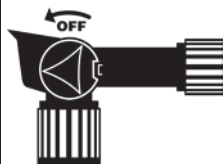
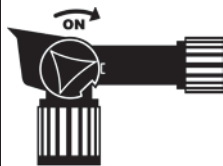
Do not allow children and pets to re-enter the treated area until sprays have dried.

How to Use

(Shake Well before using)

This product is ready to spray. Just attach this bottle to your hose according to directions. Water automatically mixes with the concentrate as you spray. Do not apply this product to waterlogged areas, as this may decrease the product's effectiveness.

HOW TO ATTACH AND SPRAY



[Optional Sprayer Directions 1]

1. Connect your garden hose to the bottle. Be sure the blue water control valve on top of the spray nozzle is in the OFF position.
2. To begin spraying, turn on water at faucet. Point nozzle towards the area to be treated and Press lock tab while using other hand to turn sprayer valve to on position.
3. To stop spraying, turn the water control valve on top of the spray nozzle to OFF. Turn off faucet.
4. Relieve water pressure by turning water control valve to the ON position until water slows to a drip. Turn water control valve back to OFF. Disconnect garden hose from bottle.
5. The unused portion can be saved and used at a later date.

Tips for Applying

1. Extend hose to the farthest area to be treated and work back toward the faucet to avoid contacting wet, treated lawn.
2. Use an even sweeping motion, ensuring thorough coverage of lawn.

[Optional Sprayer Directions 2]

CONNECT

1. Shake well before use.
2. Securely Connect sprayer to garden hose.
3. Be sure that ON/OFF Switch is in OFF position, toward hose end of sprayer.
4. Turn on water at faucet.
5. For first time use, remove plastic shipping lock from beneath switch.

SPRAY

1. Extend hose to farthest area to be treated, point sprayer nozzle in direction to be sprayed.
2. Begin spraying - Push ON/OFF Switch forward into ON position.
3. Walk at a steady pace while spraying, using an even sweeping motion, and slightly overlap treated areas. Work back toward faucet to avoid walking over wet, treated grass.


FINISH

1. To stop spraying, push ON/OFF Switch to OFF position.
2. Turn off water at faucet.
3. Relieve water pressure in hose by turning ON/OFF Switch back to ON position until water slows to a drip, then return ON/OFF switch to OFF position.
4. Disconnect sprayer from hose.

Signs of Damage to Lawns	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. European crane fly larvae often cause damage by feeding on grass roots and disrupting the soil surface. 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.
How This Product Works	After Imidacloprid Concentrate Insecticide II is applied, a protective zone is formed in the soil. If applied early, this product kills grubs when they hatch...before they can cause damage.
Product Information	To avoid serious damage to lawns, eliminate pests early in the season before they multiply. Apply early before grubs, mole crickets and European crane fly larvae hatch. Contact your County Extension Agent for the ideal dates to apply in your area. You may spray this product over soil or mulch. Remove weed barrier before applying.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by Storage or Disposal.

Pesticide Storage	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
Pesticide Disposal and Container Handling 	<p>If empty:</p> <ul style="list-style-type: none"> • Non-refillable container. Do not refill or reuse container. • Place empty container in trash or offer for recycling if available. <p>If partly filled:</p> <ul style="list-style-type: none"> • Call your local solid waste agency or toll free 1-877-229-3724 for disposal instructions. • Never place unused product down any indoor or outdoor drain.

NOTICE: Research and testing have determined that the "Directions for Use" are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, the Buyer assumes responsibility for lack of performance or safety if the product is not used according to the directions on this label.

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

Produced for



A Business Unit of Bayer CropScience, L.P.
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Imidacloprid Concentrate Insecticide II (PENDING) 06/20/2016, 06/21/2016, 09/26/2016, 09/27/2016, 10/03/2016, 10/04/2016, 11/28/2016, 11/29/2016

[Images]

