

Ms. Rebecca M. Horton, Consulting Agent
Consultant for Ambrands
118 1/2 E. Main Street, Suite 1,
Salem, VA 24153

Subject: Application to amend existing label with submission of Product Performance Data.

Product Name: Amdro Fire Ant Bait Yard Treatment
Registration No.: 73342-5
Date of Submission: March 11, 2003.

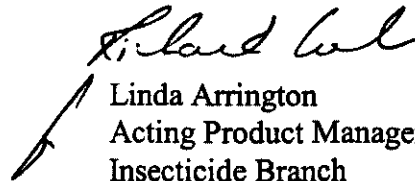
Dear Ms. Horton;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. The Agency has completed reviewing Ambrand's efficacy rebuttal, and determined that the following issues remain:
 - a. The claim "Protects your yard for up to three months" is not acceptable. This product is a bait and not a barrier treatment.
 - b. Ambrands must submit additional data on the efficacy of the product against Argentine ants before the label claim for controlling Argentine Ants may be placed on the label. Ambrands may submit a letter of commitment to provide acceptable data with a label amendment.

A copy of the efficacy review is enclosed for Ambrands' records. If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



Linda Arrington
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosures

073342-00005 S713923.wpd

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	Dec 9, 2003							

AMDRO® Fire Ant Bait Yard Treatment

[Additional Brand Name: AMDRO® Fire Ant Bait Broadcast Yard Treatment]

Optional Marketing Statements:

KILLS FIRE ANTS

IMPORTED AND NATIVE AND OTHER ANTS

KILLS THE QUEEN

DESTROYS THE MOUND

AMDRO Fire Ant Bait Broadcast Yard Treatment is highly attractive to imported and native fire ants, and other listed ants.

For Broadcast Application To Large Infested Areas

Treats Up To 10,000 sq. ft. (5 lb. packaging – area may vary proportionately for different size packages)

Easy to Apply with any standard broadcast spreader

Kills fire ants throughout the entire yard

Destroys visible and hidden mounds

Starts to Kill Ants Immediately

Do not mound treat with this product. It is intended for broadcast treatment only.

This product is NOT for use as a mound treatment. For mound treatment, use Amdro Fire Ant Bait (picture).

Amdro Fire Ant Bait Yard Treatment is specifically formulated for broadcast use – It is NOT for use as a Mound Treatment. For mound treatment, use Amdro Fire Ant Bait (picture).

For broadcast treatment only...do not use on mounds.

Not intended for use on individual mounds. Use Amdro Fire Ant Bait (picture) for mound treatment.

Covers 11,000 sq. ft. (5.5 lb. packaging - area may vary proportionately for different size packages)

Provides Season Long Control

Provides Seasonal Control

Control Up To A Season

~~Protects Your Yard For Up To Three Months~~

Prevents New Mounds From Forming

Prevents New Mound Formation

ACCEPTED
with COMMENTS
in EPA Letter Dated
DEC - 9 2003

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

73342-5

Active Ingredient:	By Weight:
Hydramethylnon: (CAS No. 67485-29-4)	0.036%
Other Ingredients:	99.964%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back/Side/Other Panel(s) for Additional Precautionary Statements

Net Weight: XXX

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact (phone number) for emergency medical treatment information.	
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 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

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION!**

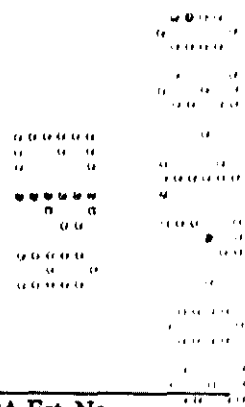
May be harmful if swallowed. Avoid contact with skin, eyes, and clothing. Wash hands thoroughly with soap and water after handling. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.

Environmental Hazards: This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift from target areas.

HOW AMDRO FIRE ANT BAIT YARD TREATMENT WORKS:

1. This product is a bait. Worker ants carry it into the mound as food for the colony.
2. They eat it and feed it to the queen. It starts to kill ants immediately.
3. In about a week the queen is dead, which destroys the mound.



DIRECTIONS FOR USE

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

Outdoor Use:

For large infested areas: Using a rotary broadcast spreader or hand held granular spreader, broadcast this product at 5 lb. per 5,000 to 10,000 sq. ft. (7.5 lb. per 7,500 to 15,000 sq. ft.; 5.5 lb. per 5,500 to 11,000 sq. ft.) For best results, apply when ants are active (typically when soil temperature is greater than 60°F). Repeat application as needed.

This product controls imported and native fire ants and other ants, such as harvester ants, bigheaded ants, ~~and Argentine ants~~. This product is for use ONLY on lawns, landscaped areas, golf courses, commercial grounds, parks and other noncropland areas, as well as on grounds surrounding poultry houses (excluding runs and ranges) or corrals and other animal holding areas. Avoid direct exposure of animals to this product.

Do not graze or feed treated lawn or sod clippings to livestock.

This product is not for use on vegetable or other food crops, timber or plants grown for sale or other commercial use, or for commercial seed production, or for research purposes.

SUGGESTED SPREADER SETTINGS

DROP SPREADERS	SETTING
Scotts AccuGreen® 1000	8.0
Scotts AccuGreen® 2000	8.5
Scotts AccuGreen® 3000	8.5
BROADCAST SPREADERS	
Scotts SpeedyGreen® 2000	6.5
Scotts SpeedyGreen® 3000	6.0
Sta-Green® 4500	5.5
Vigoro® 4300	5.0
Craftsman® Model 486.19710	4.5
EZ Spread® Model SB5500 (Precision Products Inc.)	5.0
HAND HELD SPREADERS	
Scotts HandyGreen® II	3.5
Ortho® Whirlybird®	3.0
Earthway EV-N-SPRED® Model 2700-A	3.0

Note: Spreader settings given are approximate and variation can occur between identical models. User should calibrate spreader by accurately weighing a few pounds into your spreader and applying to a measured area. Then adjust spreader setting if necessary to assure correct rate of application.

STORAGE AND DISPOSAL

STORAGE: Store in cool, dry, secure place and keep container closed. Store container away from children and pets. When properly stored, this product will retain its effectiveness for up to three months after the package has been opened.

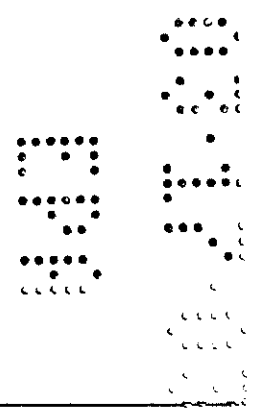
DISPOSAL: *If empty* -- Do not reuse this container. Place in trash or offer for recycling if available. *If partially filled* -- Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DISCLAIMER

Ambrands makes no express or implied warranty, including any other express or implied warranty, of **FITNESS** or of **MERCHANTABILITY**.

In case of an emergency endangering life or property involving this product, call (collect), day or night, (phone number).

Manufactured for:
AMBRANDS
2255 Cumberland Parkway
Bldg. 500, Ste. 200
Atlanta, GA 30339



OPTIONAL GRAPHICS FEATURED ON LABEL

