

AUG 17 1994

Ms. Rebecca M. Horton
Dragon Corporation
P.O. Box 7311
Roanoke, Virginia 24019

Subject: Revised Labeling
Dragon Termite & Soil Insect Killer
EPA Registration Number 16-146
Your Application Dated May 18, 1994

Dear Ms. Horton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable provided that you make the labeling changes indicated below before you release the product for shipment bearing the amended labeling:

1. Add a footnote to the ingredients statement:

Contains petroleum distillates.

2. Add a sentence to the Hazards to Humans and Domestic Animals section:

Food utensils such as teaspoons, tablespoons, or measuring cups must not be used for food after use with a pesticide.

3. In the Statement of Practical Treatment/If Swallowed, change the sentence "Contains aromatic petroleum solvent" to "Contains petroleum distillates."

4. In the Note to Physician change the sentence, "This product contains an aromatic petroleum solvent..." to "This product contains petroleum distillates..."

5. Revise the first paragraph of the Environmental Hazards section to:

This pesticide is toxic to birds, fish, and aquatic invertebrates. Birds feeding in treated areas may be killed. Clean up spilled product to reduce exposure to wildlife. Do not apply directly to water. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

DHE

Dennis H. Edwards, Jr.
Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

PL 19 16-146 09386

ACCEPTED
with COMMENTS
in EPA Letter Dated

AUG 17 1994

[FRONT PANEL]

**DRAGON®
TERMITE & SOIL INSECT KILLER**

[Additional Brand Name: DRAGON® Termite Killer]

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
16-146

Nothing Beats The Dragon!

Effective chlordane replacement.
Kills wood destroying pests.
Kills: Termites, Wood borers, Ants, Chinch bugs, Chiggers, Fire ants, Fleas, Ticks, Sod webworms,
and other listed insects.

Contains DURSBAN® insecticide.

For Termites: ½ gallon makes 12 gallons of diluted solution and treats 30 linear feet of trench.

[Note to EPA: Front panel may contain graphics representing product use, e.g., termites, fire ants, fleas,
ticks, spiders, etc.]

ACTIVE INGREDIENT:

Chlorpyrifos [0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate] 12.6%

INERT INGREDIENTS: 87.4%

TOTAL: 100.0%

Contains 1 lb. of chlorpyrifos per gallon.

**Keep Out of Reach of Children
WARNING**

See back/side/other panel(s) for additional precautions.
NET CONTENTS 1 QT (32 FL OZ) / ½ GAL (64 FL OZ)

[BACK/SIDE/OTHER PANEL(S)]

Shake Well Before Using! READ ENTIRE LABEL, INCLUDING ATTACHMENT (EPA - if
necessary). USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS
AND DIRECTIONS.

DIRECTIONS FOR USE

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

Do not use on vegetables or food crops.

FOR TERMITES (Outdoors): Remove all wood debris and wood forms. Determine the extent of termite
infestation. For prevention and light infestation, treat soil adjacent to both sides of infested foundations
of poured concrete, pipes, or piers by digging a trench 6 inches wide and 4 inches deep or down to the
top of the footing (whichever is less). For brick and block foundations, dig the trench about 12 inches
deep. If footing is more than 12 inches deep, make holes with a crowbar, pipe or a rod about 1 foot apart
that extend from the trench bottom to the top of the footing. Make holes closer in hard packed clay soils.
NEVER DIG BELOW THE TOP OF THE FOOTING.



Avoid contamination of public and private water supplies by following these precautions. Do not allow a hose or any type of faucet extension to reach into the termite chemical solution while filling or mixing this material with water. Use anti-backflow or anti-siphonage equipment on all filling equipment. These devices can be purchased at hardware or plumbing supply stores. Use of anti-backflow equipment will help ensure that the user of this toxic chemical will not contaminate domestic water supplies. Refer to FHA (Federal Housing Administration), state and local specifications for safe distances of treatment areas from wells. Soil in the vicinity of wells, cisterns or ponds should not be treated. Do not treat structures that contain cisterns or wells. NOTE: When conditions will not permit trenching, surface application adjacent to interior foundation walls may be made, but the treated strip should not exceed 18" in width.

Apply solution with a sprinkling can. Mix 5 1/3 fl. oz. (10 2/3 Tbs.) per gallon of water and treat 2 1/2 linear feet of trench or foundation, (1/2 gallon of DRAGON® TERMITE AND SOIL INSECT KILLER will make 12 gallons of diluted solution and treat 30 linear feet). Mix solution into soil as it is replaced in the trench. Cover treated soil with a layer of untreated soil. Be sure to treat the interiors of accessible hollow block foundations at same rate as above. Be careful to have adequate ventilation when treating areas under structure. For severe infestations or treatment under slabs, in basements and buildings with insufficient crawl space, etc., contact a licensed pest control operator or termite control service.

Retreatment for subterranean termites should only be made when there is evidence of reinfestation subsequent to the initial treatment, or there has been a disruption of the chemical barrier in the soil due to construction, excavation, landscaping, etc. Reapplication should be made as a spot treatment to those areas. Annual retreatment of the entire premises must be avoided.

FENCE POSTS (TERMITE PREVENTION): Apply one gallon of diluted DRAGON® TERMITE & SOIL INSECT KILLER per post hole. Pour one-half of solution into hole and add the remaining one-half gallon diluted solution to the soil when filling the hole so that all the fill soil is treated to form a protective barrier.

NOTE: Do not treat structures that contain cisterns or wells. Do not treat soil that is water saturated or frozen. Consult state and local specifications for recommended distances of treatment from well.

TREATMENT OF WOOD DESTROYING PESTS (Outdoors): *Powder post beetles, Deathwatch beetles, Round-headed house borers, Carpenter ants, Carpenter bees* — Treat localized areas of infested wood. With a paint brush, use 2 1/2 Tbs. per quart of water. Apply emulsion evenly on wood surfaces. Allow to dry and repeat treatment to ensure penetration.

For wood piles and stored lumber, apply 5 1/3 fl. oz. (10 2/3 Tbs.) per gallon of water. Use a sprinkling can or hose-end sprayer and deliver a coarse drenching spray. Do not use in structures occupied by animals to be used for food purposes, or which produce products for human consumption. **DO NOT TREAT WOOD WHICH WILL BE USED FOR FIRE PLACES OR INDOOR HEATING, OR WHICH WILL BE USED FOR HEATING IN FOOD PREPARATION.**

HOME INVADING PESTS (Use Outdoors Only): To prevent infestation of *Ants, Crickets, Spiders, Fleas, Ticks, Earwigs, Sowbugs (Pillbugs), Millipedes, Chiggers, Roaches* and other crawling insects. Treat a band of soil 6-10 ft. wide around and adjacent to the building, also to the building's foundation to a height of 2 to 3 feet when pests are active and may find entrance to your home or building. Use a hose-end (follow backflow precaution under "TERMITES") or pressure-type sprayer. Use 1/2 Tbs. in 2 gallons of water to cover 66 sq. ft. Do not treat pets with this product. Do not use inside dwellings. Do not spray vinyl siding or other plastic or rubber materials.

LAWN PESTS: To control *Ants, Armyworms, Brown dog ticks, Chiggers, Chinch bugs, Clover mites, Crickets, Cutworms, Earwigs, Fleas, Grasshoppers, Sod webworms, Ticks*, apply with a hose-end sprayer (take backflow precautions), mixing 1½ fl. oz. with 15 gallons of water to treat 500 sq. ft. of lawn, (¾ tsp. in 1 gallon of water to treat 33½ sq. ft. of lawn). Spray when pests first appear; retreat when needed. Spray entire lawn — do not spot spray. Sprays are most effective when applied two hours prior to dark when insects are most active. For Sod Webworms delay watering or mowing treated areas for 12-24 hours following treatment. Retreat as necessary at 4-6 week intervals.

WHITE GRUBS IN LAWNS (European chafer and Japanese beetle larvae only): Mix 6½ fl. oz. in 15 gallons of water to treat 500 sq. ft. (2¾ tsp. in 1 gallon of water to treat 33½ sq. ft.) and apply with a hose-end sprayer (take back-flow precautions). Spray entire lawn area — do not spot spray. For *white grubs*, spray when grubs are young and actively feeding near the soil surface, usually during late July and August, or as recommended by your local Agricultural Extension Service. Water lawn thoroughly following application to wash insecticide into the underlying soil.

For *Bluegrass billbug* mix 6½ fl. oz. with 15 gallons of water to treat 500 sq. ft. (2¾ tsp. in 1 gallon of water to treat 33½ sq. ft.) and apply with a hose-end sprayer. Spray in season when adults first appear. Retreat as needed.

IMPORTED FIRE ANT MOUNDS: Mix 1 fl. oz. (2 Tbs.) per gallon of water. Using a sprinkling can, gently sprinkle a total of 1 gallon of the diluted solution over the surface of each mound. Thoroughly wet mound and surrounding area to a 4 ft. diameter (12 sq. ft.). For best results, apply in cool weather (65°-80°F) or in early morning or late evening hours. Treat new mounds as they appear.

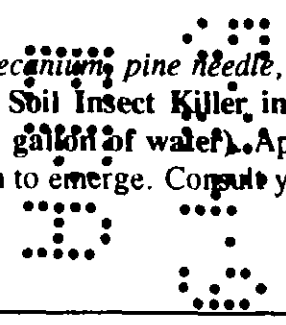
NOTICE: Mosquitoes coming to rest on areas treated for control of turf and ornamental plants will be killed for varying periods of time after treatment, depending on exposure of treated area to weather conditions.

ORNAMENTAL PLANTS: To control *Aphids, Bagworms, Eastern tent caterpillars, Fall webworms, Grasshoppers, Mites, Orangestriped oakworms, Spittlebugs, Whiteflies, Yellownecked caterpillars*, apply at the rate of 4¾ fl. oz. (9½ Tbs.) of DRAGON® Termite & Soil Insect Killer in 15 gallons of water (1¼-2 tsp. of DRAGON® Termite & Soil Insect Killer in 1 gallon of water).

To control *Cutworms, Leafhoppers, Mealybugs, Mimosa webworm, Redhumped caterpillar, exposed Thrips*, apply at the rate of 9½ fl. oz. (19 Tbs.) of DRAGON® Termite & Soil Insect Killer in 15 gallons of water (3¾ tsp. of DRAGON® Termite & Soil Insect Killer in 1 gallon of water).

For insects listed above, apply with hose-end or pump-type sprayer in a manner to provide complete and uniform coverage. For best results, apply a wetting spray to both upper and lower leaf surfaces and infested limb and trunk areas. Attempt to penetrate dense foliage, but avoid over-spraying to the point of excessive runoff. Treat when pests appear and repeat at 7-10 day intervals, if needed. **NOTE:** Do not use on azalea, camellia, poinsettia, rose bushes or variegated ivy because of possible injury to these plants.

To control *Ash borer, Lilac borer, Dogwood borer, and Scale crawlers (oak lecanium, pine needle, tea and white peach)*, apply at the rate of 19 fl. oz. of DRAGON® Termite & Soil Insect Killer in 15 gallons of water (2½ Tbs. of DRAGON® Termite & Soil Insect Killer in 1 gallon of water). Apply solution to the trunks and lower limbs of Dogwood trees when the adults begin to emerge. Consult your State Extension Service for the proper time to treat in your area.



To control *Peach tree borer* apply at rate of 57½ fl. oz. in 15 gallons of water (7½-7¾ Tbs. in 1 gallon of water). Apply solution to flowering trees and shrubs of the Genus *Prunus* as a trunk spray before newly hatched larvae enter the trees. Apply as a coarse, low-pressure spray. Thoroughly wet all bark areas from ground level to scaffold limbs. Consult your Extension Service for the proper time to treat in your area.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes eye irritation. Harmful if swallowed. Do not take internally. Do not get in eyes, on skin or clothing. Wash thoroughly after handling. Wash contaminated clothing before reuse. Avoid breathing vapors and spray mist. Avoid spraying food crops. Keep away from food, feedstuffs and domestic water supplies. Keep container closed. Handle concentrate in a ventilated area.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Contains aromatic petroleum solvent. Call a physician or Poison Control Center immediately.

IF ON SKIN: In case of contact, remove contaminated clothing and immediately wash skin with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician.

NOTE TO PHYSICIAN: This product contains an aromatic petroleum solvent and may present an aspiration problem. Chlorpyrifos is a cholinesterase inhibitor. If signs and symptoms of cholinesterase inhibition develop, atropine by injection is antidotal. 2-PAM may also be given in conjunction with atropine, but should never be used alone.

ENVIRONMENTAL HAZARDS: This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Shrimp and crabs may be killed at application rates recommended on this label. Do not apply where these are important resources. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

This product is highly toxic to bees exposed to direct treatment or residues on plants. Protective information may be obtained from your Cooperative Agricultural Extension Service.

PHYSICAL OR CHEMICAL HAZARDS: COMBUSTIBLE! Do not use or store near heat or open flame.

STORAGE: Store in original container in a cool, dry storage area, preferably locked, away from feed, foodstuffs and domestic water supplies. Do not put concentrate or diluted spray into food or drink containers. Do not store diluted spray. Store above freezing. Handle concentrate with care and store in a ventilated area. Keep container closed.

PESTICIDE DISPOSAL: Partially filled bottle may be disposed of by securely wrapping original container in several layers of newspaper and discarding in trash.

CONTAINER DISPOSAL: Do not reuse empty container. Rinse thoroughly before discarding in trash.

NOTICE: Buyer assumes all risks of use, storage or handling of this material not in strict accordance with DIRECTIONS and CAUTIONS stated on this label.

DURSBAN® is a registered trademark of DowElanco.

Distributed by
DRAGON CORPORATION
Roanoke, VA 24019

