

OCT - 4 1991

Ms. Carolyn Bussey
Ciba-Geigy Corporation
P.O. Box 18300
Greensboro, NC 27419-8300

Dear Ms. Bussey:

Subject: Revised Confidential Statement of Formula
D.z.n Granular Insect Control
EPA Reg. No. 100-468
Your submission dated June 21, 1991

The Agency has completed its review of the revised Confidential Statement of Formula (CSF) expressing the percentage of diazinon as pure active ingredient, rather than as the percentage of the manufacturing-use product used, which was submitted as a follow-up to your meeting with the Agency's Product Chemistry Section on May 8, 1991. The CSF dated 6/21/91 is the only CSF that is current. All previous CSFs are obsolete. The Agency assumes that you have efficacy data to show that this product will still be effective even if it is produced at the certified lower limit. As requested, I have encl sed a copy of the product chemistry review. This is a third variation on the type of diazinon end-use product review that the PM Team has received for your products. You have indicated that Bipin Gandhi has offered to talk with you regarding the product chemistry reviews and you may now wish to contact him directly, as there appears to be some confusion regarding your CSF submissions. For this particular product, although the reviewer indicates that the certified limits have changed, it appears that they are the same (allowing for the fact that they are now expressed in terms of the active ingredient rather than of the manufacturing concentrate used) as that appearing on your CSF dated December 7, 1989. The comment about implementing PR Notice 91-2 only during reregistration does not appear to be pertinent, especially since the submission of the new CSF is related to reregistration activities.

As previously discussed in the Agency's letter dated February 15, 1991, the Diazinon Registration Standard stipulated in the

requirements for product specific chemistry data for end-use products (Table C) that the Discussion of the Formation of Impurities (61-3) must specifically address the formation of diazoxon, TEPP, and its sulfur derivatives. Furthermore, the requirement for Certification of Ingredient Limits (62-2) specifically requires that certified upper limits for each toxicologically significant impurity present at < 0.1% (w/w) must appear on the CSF (i.e., certified upper limits for the same impurities that must be specifically addressed under 61-3 [diazoxon, TEPP, and its sulfur derivatives] must appear on the CSF form if they are present in any amount). Ciba-Geigy indicated in the May 8, 1991 meeting that these impurities would indeed be present in very small amounts in diazinon end-use products, because they are present in small amounts in the manufacturing use product from which they are derived, and that detectable levels had been observed in the storage stability studies on end-use products. Although you indicated at the May 8, 1991 meeting that Ciba-Geigy's chemistry section would begin work on these specific requirements immediately, to date the Agency has not received revised Discussions of Formation of Impurities (61-3) and revised CSFs including the upper certified limits for the toxicologically significant impurities (62-2) for your diazinon end-use products, including the subject product. Please respond to this deficiency **within 60 days** of the date of this letter. A revised Discussion of the Formation of Impurities (61-3), specifically addressing those toxicologically significant impurities identified in the Diazinon Registration Standard, must be submitted. A revised Confidential Statement of Formula, EPA Form 8570-4 (revised 2/85), including certified upper limits for any toxicologically significant impurities present, must also be submitted.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide Rodenticide Branch
Registration Division (H7505C)

D·z·n[®]

Granular

Lawn Insect Control

This product must not be used on golf courses and sod farms.

Ready to use. Contains 2% diazinon insecticide.

Treats up to 2500 square feet.

**12½ Pounds
Net Weight**

Active Ingredient:
Diazinon: O, O-Diethyl
O-(2-isopropyl-6-
methyl-4-pyrimidinyl)
phosphorothioate . . 2%

Inert ingredients: 98%

Total: 100%

KEEP OUT OF REACH
OF CHILDREN.

CAUTION

See additional precautionary statements on back of bag.

EPA Reg. No. 100-468

Controls

Brown dog ticks

Chinch bugs

Sod webworms

Lawn moths

Earwigs

Fleas

Fire ants *

White grubs of:

- Japanese beetle

- European chafer

- Southern chafer

Billbugs

. . . and many others

* Aids in control

See complete list
on back of bag

ACCEPTED

JAN 29 1990

Under the Federal Insecticide, Fungicide, and
Rodenticide Act, as amended, for the
products registered under
EPA Reg No. 100-468

CIBA-GEIGY

D·z·n kills:

- | | | |
|--------------------|--------------|--------------------|
| Ants | Crickets | Springtails |
| Armyworms | Cutworms | Sod webworms |
| Bermudagrass mites | Digger wasps | Sowbugs |
| Billbugs | Earwigs | White grubs of: |
| Brown dog ticks | Fire ants * | • Japanese beetle |
| Chiggers | Fleas | • European chafer |
| Chinch bugs | Lawn moths | • Southern chafer |
| Clover mites | Leathoppers | |
| | Millipedes | * Aids in control. |

DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product. If terms are not acceptable, return the unopened product container at once.

Conditions of Sale and Warranty

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of CIBA-GEIGY or the Seller. All such risks shall be assumed by the Buyer.

CIBA-GEIGY warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. **CIBA-GEIGY makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall CIBA-GEIGY or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product.** CIBA-GEIGY and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of CIBA-GEIGY.

DIRECTIONS FOR USE

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

OVERALL LAWN APPLICATION

D·z·n® Granules control lawn pests on both grass and dichondra lawns. Apply D·z·n Granules to your lawn with a fertilizer spreader at the rate shown on side panel chart. For application with other types of equipment, apply at the rate of 5 lbs. per 1000 sq. ft. (an area 20' by 50') or 8 oz. per 100 sq. ft. (an area 10' by 10').

Precautions: Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Apply this product only as specified on this label. Because of the migratory habits of certain waterfowl, do not apply in Nassau County, New York between November 1 and May 20. Do not exceed maximum permitted label rates, since rates above those recommended significantly increase potential hazards to birds. Avoid overlapping treated areas. If waterfowl, i.e., ducks, geese can be expected to enter the treated area after treatment (except spot treatments), water lawn with at least 0.25 inch water immediately after application, however, stop watering before puddling occurs.

Chinchbugs, Earwigs, Ants, Lawn Moths (Sod Webworms), Bermudagrass Mites, Crickets, Armyworms, Brown Dog Ticks, Chiggers, Clover Mites, Cutworms, Fleas, Leathoppers, Sowbugs, Millipedes, Springtails (Collembola): Application should be made when grass is dry. Water lawn lightly after application. Repeat application in 7-10 days if necessary.

Billbugs; White grubs of Japanese beetle, European chafer, Southern chafer, *Ataenius spretulus* (dung beetle): Water grass thoroughly after application. For billbug control, apply when activity is first observed or when chewed or brown grass indicates damage from these insects. Repeat as necessary.

For grub control, except dung beetle, treat any time between late July and early October. For dung beetle grub control, apply in Spring or early Summer when damage is first noticed. Water grass thoroughly with 1/4-1/2 in. of water after application. Treat again in late Summer or early Fall if a second generation occurs.

Hyperodes Weevils

Water grass thoroughly after application. Treat problem areas in mid-April and again in mid-May.

NOTE: The spreader settings listed below are approximate. Accurately weigh a few pounds into your spreader and apply to a measured area. Then adjust the spreader setting if necessary in order to assure correct rate of application.

SPREADER SETTING NO.

Spreader Make and Model	For insects listed Grass and Dichondra Lawns 5 lbs./1,000 sq. ft. of lawn
Central Imperial Mark No. 1662-G	7 1/2
Central Suburbia Lawn Spreader No. 1622-0	7 1/2
Cyclone Model B1 Rotary	6
Greenfield Model 105	8
J.C. Penney Model 6005	8 1/2
J.C. Penney Rotary Spreader	8
Scott's Precision Flow Spreader PF-1	6 1/2
Sears Craftsman Model 671.19198	7 1/2

ANT TREATMENT

Ants: Apply one tablespoon of D·z·n Granules over and around each individual ant hill.

Fire Ants: To aid in the control of fire ants in lawns and other recreational areas, apply 1¼ cups over, and 2 ft. around, each fire ant mound. Immediately after application, water in thoroughly. A minimum of 1 gallon of water should be applied to each mound area. Apply water gently to avoid disturbing ants. Use of high pressure watering equipment may disturb the ants and cause migration, reducing product effectiveness. Treat as necessary.

Note: For best results, apply in cool weather, 65-80° F, or in early morning or late evening hours. Treat new mounds as they appear.

Digger wasps: Apply one tablespoon of D·z·n Granules in and around each individual ground nest opening. Make the application about dusk when the wasps are not active.

BAND TREATMENT AROUND FOUNDATION

The following insects are commonly found around or near the foundation of houses as well as in the lawn.

Ants	Crickets	Millipedes
Brown dog ticks	Earwigs	Sowbugs
Clover mites	Fleas	Springtails (Collembola)

For control of the above insects, apply a five-foot band of D·z·n Granules next to the foundation of the house. Distribute the granules uniformly using a rate of 8 oz. for each 5' by 20' area to be treated.

Storage and Disposal

Storage: Store in original container in a cool, dry, well-ventilated area inaccessible to children and domestic animals. Do not store near fertilizers, herbicides, seeds, food, or feed. Do not reuse bag. Discard bag in trash.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Container Disposal: Do not reuse empty bag. Discard bag in trash.

Precautionary Statements**Hazards to Humans and Domestic Animals****CAUTION**

Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing dust and contact with eyes, skin, or clothing. Wash thoroughly after handling and before smoking or eating. May cause contact sensitization following repeated contact with skin of susceptible individuals. If sensitization reactions result, contact a physician. Do not store near food or feed products. Food utensils such as tablespoons or measuring cups must not be used for food purposes after use in measuring pesticides. Do not contaminate ornamental fish ponds. Do not allow children or pets onto the treated area until granules have been watered in and the grass dried.

Statement of Practical Treatment

If swallowed, call a physician immediately. Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth if person is unconscious or convulsing.

If inhaled, remove victim to fresh air and apply artificial respiration if indicated.

If on skin, wash promptly with soap and water. Rinse thoroughly.

If in eyes, rinse eyes with plenty of water and call a physician immediately.

Note to Physician

This product is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

Environmental Hazards

This product is highly toxic to fish and wildlife. Birds feeding on treated areas may be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and pot-holes). Runoff may be hazardous to aquatic organisms in neighboring areas. Collect or incorporate granules that are spilled during loading or are visible on soil surfaces in turn areas. Do not contaminate water by disposal of equipment washwaters.

Because of the migratory habits of certain Atlantic Coast waterfowl, do not apply this product to lawns in Nassau County, New York between November 1 and May 20. Do not exceed maximum permitted label rates. Rates above those recommended significantly increase potential hazards to birds and waterfowl. Avoid overlapping of granules. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where fish, shrimp, crab and other aquatic life and important resources.

D·z·n® trademark of CIBA-GEIGY for diazinon

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