

FEB - 8 1991

Ms. Katherine Buteau
Chevron Chemical Company
Ortho Consumer Products Division
940 Hansley Street
Richmond, CA 94804-0036

Subject: Amendment: Revise per Agency letter dated July 19, 1990
and defend "Controls" claim
Ortho Diazinon Granular Fire Ant Killer
EPA Reg. No. 239-2503
Your FAX submission dated January 29, 1991

Dear Ms. Buteau:

The amendment referred to above, submitted in connection with a registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable provided the following revisions are made prior to release for shipment under the amended labelings:

- 1) The Diazinon Registration Standard stipulates that only homeowner use outdoor products (or commercial outdoor use products limited to home yard use) are not restricted due to avian and aquatic toxicity. While your product presumably is intended for home use (since it is marketed by your Consumer Products Division), the label does not specifically indicate this. In fact the front panel claim "For Use in Lawns and Other Recreational Areas" could be interpreted as allowing use in any number of commercial, industrial, or institutional sites (which would render this a Restricted Use product). To clarify the intended use site the front panel claim should be revised to indicate "For Use on Home Lawns and Other Outdoor Home Recreational Areas".
- 2) Your cover letter confirmed that this product is sold only in the current fire ant infested states and is not sold in New York state. You also indicated that you would add the Nassau County, New York lawn prohibition (and any other current appropriate prohibitions) if warranted by a change in the states affected, however, your label still includes the New York state prohibition. In addition, the revised Environmental Hazards text for diazinon fire ant control products, as presented in our letter of July 19, 1990, addresses the

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problem of potentially contradictory watering-in recommendations between the Environmental Hazards text, which was directed at overall lawn use rather than just spot treatment, and the directions for use, i.e., the former indicates "apply a minimum of 0.25 inch of water" while the directions are very specific, "Immediately after application, water in thoroughly. A minimum of 1 gallon of water should be applied to each mound area. Do not use more than 2 gallons of water.". Finally, the Environmental Hazards statement "Avoid overlapping granules" pertains to the overlapping of application paths when applying diazinon granular products by lawn spreader for overall lawn treatment. Fire ant control products such as yours are not applied with a lawn spreader. For all of the above reasons the Agency strongly recommends your using the Environmental Hazards text as indicated in the Agency's letter dated July 19, 1990. Specifically, the text for that section should appear as follows:

This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Do not exceed maximum permitted label rates. Application rates above those recommended significantly increase potential hazards to birds and waterfowl. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Runoff may be hazardous to aquatic organisms in neighboring areas. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

- 3) The claim "controls fire ants" is acceptable based upon efficacy data, EPA Accession No. 257256, submitted by Chevron Chemical Company on May 6, 1985 and accepted by the Agency's letter dated July 25, 1985.

A stamped copy is enclosed for your records. Please submit five (5) copies of the finished revised label prior to release for shipment under the amended labeling.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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Diazinon Granular Fire Ant Killer

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing dust and contact with eyes, sun or clothing. Wash thoroughly after handling and before smoking or eating. May cause skin sensitization following repeated contact with skin of susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, contact a physician. Do not store near food or feed ducts. Food utensils such as tablespoons or measuring cups must not be used for food purposes or 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 ACTUAL TREATMENT:** If swallowed, call a physician immediately. Drink one or two glasses of water to 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 comatose. If inhaled, remove person 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: Physicians: Emergency Information—call 1-800-457-2022. This 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 birds, fish and other wildlife. Birds, especially waterfowl feeding or drinking on treated areas may be killed. Because of the migratory habits of certain waterfowl, do not apply this product to lawns in Nassau County, New York between September 1 and May 20. Do not exceed maximum permitted label rates. Application rates above those recommended significantly increase potential hazard to birds and waterfowl. Avoid overlapping applications. Where irrigation (watering) is recommended in the directions or if waterfowl (ducks or geese) are expected in the treated area after treatment (except spot treatment), apply a minimum of 0.25 inch of water immediately after applying this product. Stop irrigation before puddling occurs. Keep out of streams, ponds, tidal marshes, and estuaries. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Runoff may be hazardous to aquatic organisms in neighboring areas. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where shrimp, crab and other aquatic life are important resources. Do not contaminate water by cleaning equipment or disposal of equipment washwaters.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.**

Treatment — Imported Fire Ants: To control imported fire ants in lawns and other recreational areas, apply 1/2 cup in a 3 ft. diameter over and around each fire ant mound. Immediately after application, water thoroughly. A minimum of 1 gallon of water should be applied to each mound area. Do not use more than 2 gallons of water. Apply water gently to avoid disturbing ants. Use of high pressure watering may irritate the ants and cause migration, thus reducing effectiveness of treatment. Treat new mounds as they appear. For best results apply in cool weather, 65-80°F, or in the early morning or late evening hours.

STORAGE AND DISPOSAL

STORAGE: Keep pesticide in original container. Do not put into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area. **DISPOSAL:** **PRODUCT** — Partially filled canister may be disposed of by securely wrapping original container in several sheets of newspaper and discard in trash. **CONTAINER** — Do not reuse empty canister. Discard canister in trash.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Read the Use Granules
Controls Imported Fire Ants
For Use in Lawns and Other
Recreational Areas



Active Ingredient
Diazinon [0,0-diethyl 0-(2-isopropyl-5-methyl-4-pyrimidinyl) phosphorothioate] 95%
Inert Ingredients 5%

Keep out of reach of children.
CAUTION
See back panel for additional
precautionary statements.

NET WT. 1 LB.

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