

APR 23 1992

Mr. Gene Currie
Imperial, Inc.
P.O. Box 98
Shenandoah, IA 51601

Subject: Amendment - Revise per Diazinon Registration Standard
Imperial Diazinon 14G
EPA Reg. No. 407-426
Your submission received: June 6, 1990

Dear Mr. Currie:

Please be aware that there have been a number of revisions to Ciba-Geigy's 14G label since the version you submitted and that by incorporating the comments in this letter you will be able to bring your label up to date. A copy of Ciba-Geigy's latest label is enclosed to aid you in revising your label. Your label must include only the crops, directions, and precautions found on Ciba-Geigy's label (plus any updating revisions specified in this letter).

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

1) In the Statement of Practical Treatment, add "Get medical attention." to the end of the "If on skin" advice, based upon the Agency's review of the product specific toxicology data upon which you are relying for reregistration.

2) Revise the Note to Physician to read as follows:

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.

3) In the Precautionary Statements, the Hazards to Humans and Domestic Animals should read as follows:

2 4 7

CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing dust and contact with eyes, skin, or clothing. Wash thoroughly after handling and before eating or smoking. Do not store near food or feed products. Do not contaminate ornamental fish ponds.

- 4) Revise the Environmental Hazards text to read 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. Avoid overlapping of granules. Collect or incorporate granules that are spilled during loading or are visible in turn areas. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. 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 wash waters.

- 5) Because the only crop uses that will remain on this agricultural use product will be pre-plant or at-plant soil incorporation, you may delete the Re-Entry Statement. However, the Work Safety Rules and the Personal Protective Equipment headings and text must appear on the label, since these pertain to pesticide applicators. Please refer to the enclosed sample label for the exact wording for this section.
- 6) In the first section of text under the heading "Directions for Use" revise the second sentence to read "FAILURE TO FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR INSECT CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.". The next paragraph should read as follows:

Unless directions under "Timing/Special Directions" state otherwise, applications to the soil should be worked into the top few inches immediately after application with a rotary hoe, cultivator, disk, harrow, or other suitable means.

- 7) For all crops "Rate for Cutworms" is 14-28 lbs. per acre, the "Rate for Wireworms" is 21-28 lbs. per acre, and the "Rate for Mole Crickets" is 7 lbs. per acre and the "Rate for Root Maggots" is 14-21 lbs per acre. Application rates for less than an acre are unnecessary since this product is restricted to commercial use. The per acre rates should be relocated to appear with the appropriate directions under the heading

"Vegetable Crop Insects". If you choose to retain application rates for less than 1 acre, your label must give the per acre rate first and you must confirm that the rates for lesser areas will not exceed the allowed per acre rate.

- 8) For the crop "Sugar Beets", delete the directions for a second application involving unincorporated granules and the note about contact with seeds which pertains to unsupported in-furrow application (however, do not delete the note about the maximum pounds per acre per season). The "Timing/Special Directions" for sugar beets would then read as follows:

Apply in a 5-7 inch band (based on 22" row spacing)
incorporated 2-3 inches at planting.

- 9) Delete the directions for post emergent application to corn (ie., the corn row spacing table).
- 10) The introductory paragraph under the heading "Vegetable Crops" must contain the following limitations:

For application by ground equipment only. Do not apply this product to food crops grown in greenhouses.
- 11) It is recommended that you add a depth of incorporation table. Please refer to Ciba Geigy's Diazinon 14G label. The depth of incorporation should agree between the table and that specified in the text.
- 12) You may delete the pea and bean forage limitation from the "cutworm" and "wireworm" directions.

A stamped copy of the label is enclosed for your records. Please submit five copies of the revised amended label prior to release for shipment under the amended label. Labeling released for shipment after the August 31, 1992 deadline imposed by the Diazinon Registration Standard, as amended, must be the revised amended label.

Sincerely yours,

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

Attachment: Ciba Geigy's 14 G label for reference

RESTRICTED USE PESTICIDE

Due to Avian and Aquatic Toxicity

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.

**IMPERIAL
DIAZINON 14G**

ACTIVE INGREDIENT:

Diazinon [O,O-diethyl-O-(2-isopropyl-6-methyl-4-pyrimidinyl)phosphorothioate] 14.3%

INERT INGREDIENTS: 85.7%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN (12 pt. type)

CAUTION (18 pt. type)

STATEMENT OF PRACTICAL TREATMENT

- IF SWALLOWED** - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with a finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.
- IF INHALED** - Remove victim to fresh air and apply respiration if indicated.
- IF ON SKIN** - Remove contaminated clothing and wash affected areas with soap and water.
- IF IN EYES** - Flush eyes with plenty of water. Call a physician if irritation persists.

NOTES TO PHYSICIAN: This product is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 407-426
EPA Est. 407-1A-1

P 846 006 467

NET CONTENTS _____

Manufactured by
IMPERIAL INC.
SHENANDOAH, IA 51601

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 23 1992

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

407-426

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing dust and contact with eyes, skin or clothing. Wash thoroughly after handling and before eating or smoking. Do not store near food or feed products.

May cause contact sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician.

ENVIRONMENTAL HAZARDS

Because of the migratory habits of certain Atlantic coast waterfowl, do not apply this product 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 granules. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Shrimp and crab may be killed at applications rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources. This pesticide is highly toxic to fish and wildlife. Birds feeding in treated areas may be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and pot-holes). Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Collect granules that are spilled during loading. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

PERSONAL PROTECTIVE EQUIPMENT: Long-sleeved, long-legged pant, shoes and socks, and chemical-resistant gloves.

Twenty-four hours must elapse between the time of application and the time a worker enters or is allowed to enter the treated area unless the person entering the treated area is wearing the personal protective equipment listed above.

Do not apply this product in a way that will contact unprotected workers, either directly or through drift. Only protected handlers may be in the area during application.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Oral warnings must be given which inform the workers of areas or fields that may be entered without specific personal protective equipment for 24 hours after application and appropriate actions to take as described under Precautionary Statements. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: "CAUTION: Area treated with Dieldrin 14E on (date of application). Do not enter without appropriate personal protective equipment for 24 hours after application. In case of accidental exposure, flush eyes or skin with plenty of water. Call a physician if irritation persists. Remove and wash contamination clothing before reuse

FAILURE TO FOLLOW ALL PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR INSECT CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.

STORAGE: Store in original container only, in a cool, dry, secure area, away from fertilizers, food, or feed. Keep container closed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Do not contaminate water, food, or feed by storage or disposal.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke. **DO NOT REUSE.**

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup and disposal of waters.

CUTWORMS: Broadcast 14 to 28 lbs. per acre. For surface cutworms apply just prior to planting or when larvae first appear and work into soil 1 to 2 inches. Do not apply after layby. For subterranean cutworms apply just prior to planting and work into soil 3 to 6 inches.

SEED CORN MAGGOTS: Broadcast 14 to 28 lbs. per acre just prior to planting. Work into soil 2 inches.

WIREWORMS: Broadcast 21 to 28 lbs. per acre before planting. Work into soil 4 to 6 inches.

SUGAR BEETS

SUGAR BEET ROOT MAGGOT: Apply 7 to 14 lbs. per acre in a 5 to 7 inch band (based on row width of 22 in.) or 4.7 to 9.4 oz. per 1,000 linear feet of row in a 5 to 7 inch band either incorporated 2 to 3 inches at planting or applied above the seed after the seed is covered. Apply ahead of the press wheel. If a heavy maggot infestation is anticipated or a wet Spring occurs, a second application may be made early postemergence, when the adult maggot flies first appear. If a second application is necessary, apply 7 to 10-1/2 lbs. per acre in a 5 to 7 inch band (based on row width of 22 in.) or 4.7 to 7.1 oz. per 1,000 linear feet of row in a 5 to 7 inch band directly over the row.

Note: Diazinon should not come in direct contact with the seed or injury will occur.

WIREWORMS: Broadcast 21 to 28 lbs. per acre just prior to planting. Work into soil 4 to 6 inches.

SUGGESTED RATES ACCORDING TO CORN ROW SPACING

Row Spacing	Linear Feet of Corn Row Per Acre	Amount of Diazinon 14G per Acre Postemergence Basal Treatment
48"	10,890	3 to 6 lbs.
42"	12,455	3-1/4 to 6-1/2 lbs.
40"	13,068	3-1/2 to 7 lbs.
36"	13,929	3-3/4 to 7-1/2 lbs.
36"	14,520	4 to 8 lbs.
30"	17,427	4-3/4 to 9-1/2 lbs.
28"	21,760	5-1/4 to 11-1/2 lbs.
20"	26,126	7 to 14 lbs.
15"	34,480	9-1/4 to 18-1/2 lbs.

NOTE: For any row spacing not listed, calculate the appropriate dosage rate by dividing the amount of Diazinon 14G per acre by the linear feet of row per acre.

Do not use on food crops grown in greenhouses.

This product should be applied uniformly as directed for each crop. When a range of rates is given, use the higher rate for heavy infestations.

BROCCOLI, BRUSSELS SPROUTS, CABBAGE AND CAULIFLOWER - Root Maggots: Broadcast 5 to 7-1/2 oz. per 1,000 sq. ft. (1/2 to 3/4 oz. per 100 sq. ft.) before planting or transplanting. Work into soil 3 to 4 inches.

POTATOES - Cutworms (surface and subterranean): Broadcast 5 to 10 oz. per 1,000 sq. ft. (1/2 to 1 oz. per 100 sq. ft.) before planting. Work into soil 4 to 6 inches. **Wireworms:** Broadcast 7-1/2 to 10 oz. per 1,000 sq. ft. (3/4 to 1 oz. per 100 sq. ft.) before planting. Work into soil 4 to 8 inches. **NOTE:** Do not apply to commercially grown potatoes which will be hand-harvested.

SWEET CORN - Cutworms: Broadcast 5 to 10 oz. per 1,000 sq. ft. (1/2 to 1 oz. per 100 sq. ft.). For surface cutworms apply just prior to planting and work into soil 1 to 2 inches. For subterranean cutworms apply just prior to planting and work into soil 3 to 6 inches. **Seed Corn Maggots:** Broadcast 5 to 10 oz. per 1,000 sq. ft. (1/2 to 1 oz. per 100 sq. ft.) before planting. Work into soil 2 inches.

CUTWORMS: (Surface and Subterranean) Preplant only. For Broccoli, Brussels Sprouts, Cabbage, Muskmelons, Cauliflower, Celery, Collards, Cucumbers, Kale, Lettuce, Cantaloupes, Parsley, Peas (succulent varieties only), Peppers, Lima, Pole, and Snap Beans (succulent varieties only), Spinach, Summer and Winter Squash, Swiss Chard, Tomatoes, and Watermelons broadcast 5 to 10 oz. per 1,000 sq. ft. (1/2 to 1 oz. per 100 sq. ft.). Work into soil 2 to 3 inches for surface cutworms, 3 to 6 inches for subterranean cutworms. Do not feed pea or bean forage to livestock.

WIREWORMS: For Broccoli, Brussels Sprouts, Cabbage, Carrots, Cantaloupes, Cauliflower, Celery, Collards, Cucumbers, Kale, Lettuce, Muskmelons, Onions, Parsley, Peas (succulent varieties only), Peppers, Lima, Pole and Snap Beans (succulent varieties only), Spinach, Summer and Winter Squash, Swiss Chard, Tomatoes, and Watermelons broadcast 7-1/2 to 10 oz. per 1,000 sq. ft. (3/4 to 1 oz. per 100 sq. ft.) before planting. Work into soil 4 to 8 inches. **Sweet Potatoes:** Broadcast 7-1/2 oz. per 1,000 sq. ft. (3/4 oz. per 100 sq. ft.) before planting. Work into soil 4 to 5 inches. Do not feed pea or bean forage to livestock.

MOLE CRICKETS: Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Collards, Endive (escarole), Kale, Lettuce, Mustard, Peppers, Radishes, Tomatoes, Turnips broadcast 10 to 15 oz. per 1,000 sq. ft. or 1/4 oz. per 100 sq. ft.) when moths are present. Make application to plant beds or fields 1 to 2 days prior to sowing of seed or transplanting and work into soil 1 to 2 inches.

Seller guarantee shall be limited to the terms of the label, and subject thereto, the buyer assumes any risk to persons or property arising out of use or handling and accepts the product on these conditions.