UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20480



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 14, 2000

Mr. Richard Fresh Verdant Brands 213 S.W. Columbia Street Bend, OR 97702

Subject:

Golf Course Turf & Industrial Site Perimeter Granules

(Previously named Lawn & Perimeter Granules)

EPA Reg. No. 769-726 Submission dated 7/13/00

Dear Mr. Fresh:

The revised product labeling referred to above, submitted in connection with the Chlorpyrifos Memorandum of Agreement (MOA) as amended, is acceptable, with the following comments:

- 1. All references to golf courses must read as "golf course turf," including the new name of the product.
- 2. The restriction "For Professional Use Only" must appear prominently in the directions for use for fire ant mound treatment.
- 3. The statement, "Maximum application rate is 1 lb a.i. per acre." must appear on the label in the Directions for Use section of the label.
- 4. The Agency notes that the product name has been changed from "Lawn & Perimeter Granules" to "Golf Course Turf & Industrial Site Perimeter Granules." (Note: We have added "Turf" following "Golf Course" in the name.)

The conditions of paragraph 5 of the June 2000 Memorandum of Agreement apply to this label amendment, specifically this amended label is effective December 1, 2000. Failure to comply with any of the conditions of registration set forth in Paragraph 10 of the MOA shall be grounds for cancellation of the affected registration(s) under FIFRA section 6(e). Submit one copy of the revised final printed label before releasing the product for shipment. If the conditions enumerated above are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e).

A stamped copy of the label is enclosed for your records. If you have questions about this label review, please contact Ann Hanger at (703) 308-8036 or electronically at Hanger. Ann@EPA.gov.

Sincerely,

me muly Dennis McNeilly, Chemist

Insecticide-Rodenticide Branch

Registration Division (7505C)

GOLF COURSE & INDUSTRIAL SITE PERIMETER GRANULES

For Effective Long Lasting Control of Chinch Bugs and Sod Webworms

Public Health Use For Mound Treatment Control of Imported Fire Ants

Use For Crawling Insect Control Outside of Warehouses, Food Processing Plants and Other Industrial Sites

ACTIVE INGREDIENT:

Chlorpyrifos: [0,0,-diethyl 0-(3,5,6-trichloro-2-pyridyl)

phosphorothicate] 1.0%
OTHER INGREDIENTS: 99.0%
TOTAL: 100.0%

EPA Reg. No. 769-726

EPA Est. Nos. 44616-MO-1 (H), 47427-OH-1(M), 11600-MN-1 (C)

Letter within parenthesis corresponds to the first letter of Batch No. printed on container.

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Additional Precautionary Statements

FIRST AID

This product is an organophosphate Insecticide

If Swallowed: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. DO NOT induce vomiting or give anything by mouth to an unconscious or convulsing person. Get medical attention.

If In Eyes: Flush eyes with plenty of water.

If On Skin: In case of contact, remove contaminated clothing and was effected area with soap and water.

Note To Physician: Chlorpyrifos is a cholinesterase inhibitor. Treat

symptomatically. Atropine is an antidote only by injection.

ACCEPTED with COMMENTS In EPA Letter Dated:

NOV 1 4 2000 Under the Federal Insecticide, Pungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 1 4 200

PRECAUTIONARY STATEMENTS Hazards To Humans and Domestic Animals CAUTION

May be harmful if swallowed. Avoid contact with eyes, skin and clothing. Avoid breathing dust. Wash thoroughly after handling and before eating or smoking. Wash contaminated clothing before reuse. Keep away from food, feedstuffs and water supplies. When watering-in of the insecticide is required children and pets should be kept off treated areas until material is washed into the soil and the grass is dry.

ENVIRONMENTAL HAZARDS

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.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store product in its original container in a cool, dry. Locked place our of reach of children.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

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.

IMPORTED FIRE ANT CONTROL

Mound Treatment: For Public Health treatment of fire ant mounds occurring in turf and premise areas, treat individual ant mounds measuring from 3 to 12 inches in diameter by applying 5 tablespoonfuls (1 oz.) of granules evenly in a circle around the outer edges (1 to 2 feet from the center) of the mound. Finish the treatment by applying 5 tablespoonfuls (1 oz.) sprinkled evenly over the center of the mound. Best results will be obtained if mound is not disturbed after treatment thus allowing ants to come and go and to be exposed to the insecticide. Repeat treatments as needed for additional control, but not more than once every 7 days.

GENERAL DIRECTIONS FOR USE ON GOLF COURSES

Apply uniformly to golf course areas using any hand or power operated gravity or rotary type spreader designed for application of granules. Treat when insects first appear, at the rate of 2.25 lbs./1,000 sq. ft. (100lbs./acre). For control of soil feeding insects (sod weborms, white grubs and crane fly larvae, bluegrass billbugs) sprinkle the turf after application with 15 gallons of water per 1,000 sq. ft. (1,300 gals./acre) to move the granules into the zone of insect infestation, see table below. Repeat treatment as necessary. For sod webworms, delay watering or mowing the treated area for 12 to 24 hours after treatment.

SURFACE AND SOIL FEEDING INSECTS

For control of Ants, Armyworms, (such as Beet, Fall, Yellowstriped), Brown Dog Ticks, Centipedes, Chiggers, Chinch Bugs, Cutworms, Crickets, Earwigs, Fiery Skipper, Fleas, Gnats, Grasshoppers, Greenbugs, Leafhoppers, Lucerne Moth, Millipedes, Mites (such as Clover, Formula Grass, Winter Grain), Sod Webworms (Lawn Moth), Sowbugs, Springtails and Ticks use 2.25 lbs./1,000 sq. ft. It is not necessary to water in the granules to obtain control of surface insects.

PERIMETER TREATMENT USE FOR CRAWLING INSECT CONTROL OUTSIDE OF WAREHOUSES, FOOD PROCESSING PLANTS, AND OTHER INDUSTRIAL SITES

The following pests are commonly found around or near the foundations. Many of these insects will enter the facility seeking food and shelter. Ants, Brown Dog Ticks, Crickets, Clover Mites, Cockroaches, Earwigs, Fleas, Millipedes, Springtails, Sowbugs (pillbugs), Spiders, Ticks. To control and prevent entry of these pests, apply this product in a band 2 to 6 feet wide around and next to the building foundation using a suitable spreader. Apply when pests are active and may find entrance. Thoroughly treat garbage and trash can areas. Apply as follows: 1 lb. will treat 400 sq. ft. of soil surface.

	1 lb. will Treat	4 lbs. will Treat
Band Width	(linear feet)	(linear feet)
2 feet wide	200 feet	800 feet
4 feet wide	100 feet	400 feet
6 feet wide	66 feet	264 feet

Repeat one month later than as needed for control but not more than once every 7 days.

SPREADER SETTINGS are approximate. Your spreader may need recellibrating due to age and use. Test proper working condition by placing 1.25 lb. of granules into your spreader using the setting at the "2.5 lb. rate". Apply over a

premeasured area 500 sq. ft. (5 ft. x 100 ft. long). If the "spreader" contains granules at the end of the test, open the spreader ½ to ¾ setting; if granules have run-out before the end of the test, close (shut) the spreader ½ to ¾ setting. Repeat test if indicated. Insects may not be killed and control may be "spotty" if your spreader does not apply the exact recommended amount/1,000 sq. ft. as found on this label.

SPREADER SETTINGS				
SPREADER	ER <u>Pounds of Product for Use per 1,000 sq. ft.</u>		- 1	
	2.5 lb.	3.5 lbs.		
Scott Lawn	4	5		
Cyclone B1	3.5	4.5		

IMPORTANT: Read these entire Directions and Conditions of Sale before using this product. DISCLAIMER: SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.

Distributed by: SureCo, Inc. an indirect subsidiary of Verdant Brands, Inc. 9555 James Avenue South, Suite 200 Bloomington, MN 55431 (612) 703-3300

NET WEIGHT: 50 LBS.

6/00

Chlorpyrifos revision