



769-825

10/30/2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 30 2000

Gary N. Clark
Director, Regulatory & Government Affairs
Verdant Brands, Inc.
9555 James Ave South, Suite 200
Bloomington, MN 55431


Subject: Label Amendment: MOA
SMCP Dursban 2.5G Insecticide
EPA Reg. No. 769-825
Submissions dated July 13, 2000, "acceptable with comments"

Dear Mr. Clark:

The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

- 1) The label and form 8570-1 must state in box 4 that the package size is 25 pounds or larger. It is noted that the January 22, 1996 8570-1 form which is on file, lists 20, 25, 40, 50 lb bags. A new form must be submitted since the 20 lb bag is not legal unless the product is labeled as a restricted use pesticide. As a restricted use product the following statement must be placed on the label: "Restricted Use Pesticide: 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"
- 2) On page 3 Directions for use for golf course turf (you must add turf)
- 3) You must submit three (3) copies of the final printed label and form 8570-1 for our files prior to releasing the product for shipment.
- 4) The product must be marketed in 25 pounds bags or larger and it must be specified on the label or labeled as a restricted use pesticide.

If you have any questions please call me at (703) 308-8328.

Sincerely yours,

Akiva Abramovitch, Ph.D.
Chemist
Insecticide-Rodenticide Branch
Registration Division (7505C)

SMCP DURSBAN* 2.5G INSECTICIDE

GOLF COURSE TURF AND PERIMETER INSECT CONTROL

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

ACCEPTED

with COMMENTS

ACTIVE INGREDIENT:	In EPA Letter Dated:	
Chlorpyrifos: [0,0,-diethyl	OCT. 3.0. 2000	2.5%
phosphorothioate]	Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 769-825	
INERT INGREDIENTS:		97.5%
TOTAL:		100.0%

*Dursban is a trademark of Dow AgroSciences LLC

EPA Reg. No. 769-825

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

STATEMENT OF PRACTICAL TREATMENT

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.

PRECAUTIONARY STATEMENTS
Hazards To Humans and Domestic Animals
CAUTION

May be harmful if swallowed. Avoid contact with eyes, skin and clothing. Avoid breathing dust. Keep away from food, feedstuffs, and water supplies. If watering in is directed, children and pets should be kept off treated areas until this material is washed into the soil and grass is dry.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: long-sleeved shirt and long pants, waterproof gloves, shoes plus socks and a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C0. Follow manufacturers instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Removed PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

PUBLIC HEALTH USE FOR IMPORTED FIRE ANT CONTROL

Mound Treatment: For treatment of fire ant mounds occurring in lawns, turf and premise areas, treat individual ant mounds measuring from 3 to 12 inches in diameter by applying 3 tablespoonfuls (0.6 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 2 tablespoonfuls (0.4 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.

FIRE ANT CONTROL IN NURSERY, BENCH AND POTTING SOILS INTENDED PRIMARILY FOR WOODY ORNAMENTALS TO BE GROWN OUTDOORS IN CONTAINERS

Mix 1 lb. plus 2 oz. (18 ounces) of this product with 1 cubic yard of growing medium. Thoroughly blend granules into medium using an appropriate mechanical mixer. Do not use plants which have been exposed to treated soil for food or feed purposes. For 10" or 12" plants use 4 tbsp. Mix into soil surface.

GENERAL DIRECTIONS FOR USE ON GOLF COURSES

Apply Dursban 2.5%G uniformly to golf course turf using any hand or power operated gravity or rotary type spreader designed for application of granules. Treat when insects first appear, using Dursban 2.5%G per acre at a rate of 40 lbs./acre for Surface insects. For control of soil insects after application, sprinkle the turf with 30 gallons of water per 1,000 sq. ft. (1300 gals./acre) to move the granules into the zone of insect infestation. It is not necessary to water the insecticide in for control of surface insects. The following table gives amounts of Dursban 2.5%G and water needed for small areas. Repeat treatment as necessary. For sod webworms delay watering and mowing the treated area for 12 to 24 hours after treatment.

HOW MUCH TO USE FOR SURFACE INSECTS 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 approximately 1 lb./1,000 sq. ft. It is not necessary to water the insecticide into the soil to obtain control of surface insects.

Areas to be Treated	Pounds of Dursban 2.5%G	Gallons of Water to Sprinkle on Area after Treatment
1,000 sq. ft.	1 lbs.	30 gals.
5,000 sq. ft.	5 lbs.	150 gals.
10,000 sq. ft.	10 lbs.	300 gals.

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

To protect against insects entering the indoors, a band of granules may be placed around the outside of buildings to kill ants, brown dog ticks, crickets, earwigs, fleas, millipedes, sowbugs, springtails, and spiders before they attempt to enter. Use one pound to treat 500 sq. ft. (as a band 5 ft. x 100 ft. long) around the structure. Apply when insects have become troublesome or before they cause problems in the spring or early fall. Repeat one month later and then as needed to control but not more than once every 7 days.

SPREADER SETTINGS are approximate. Your spreader may need recalibrating due to age and use. Test proper working condition by placing 1/2 lb. of Dursban 2.5%G into your spreader using the setting at the "1 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 1/2 to 3/4 setting; if granules have run-out before the end of the test, close (shut) the spreader 1/2 to 3/4 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	SPREADER SETTINGS	
	Pounds of Dursban 2.5%G to Use per 1,000 sq. ft.	
	1 lb.	1.5 lbs.
Scott Lawn	3 1/2	3 3/4
Cyclone B1	3	3 3/4

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 out 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.

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.

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Chlorpyrifos revision