

769-826

7/11/2000

Page 186



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

JUL 11 2000

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

Stacy S. Hartis
Regulatory Affairs Specialist
SureCo, Inc. an indirect subsidiary of Verdant Brands, Inc
3708 Cliff Haven Drive
Raleigh, NC 27615-8118

Dear Ms. Hartis:

Subject: Label Amendment:PR-Notice 96-7 and its addendum dated 9/9/97
SURECO T.A.S.K (chlorpyrifos).
Resubmission dated May 24, 2000 for EPA Reg. No. 769-826, acceptable with comments.

The Agency has reviewed your amended label and the following comments apply:

- 1) The recent Chlorpyrifos Revised Risk Assessment and Agreement with Registrants will render your present label unacceptable and the product will be canceled. A Fact Sheet that summarizes the agreement is enclosed for your information.
2) The recent label you submitted is improved over the previous label with the incorporation of the of the 96-7 homeowners termiticide precautionary language and it is "acceptable with comments" until the cancellation due date of your product. A stamped label "accepted with comments" is enclosed for your records.
3) You must use in the future the new First Aid statement implemented by the Agency's Consumer Labeling Initiative in PR Notice 2000-3.

Please submit five (5) copies of the final printed label. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

Akiva Abramovitch (handwritten signature)

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

SURECO T.A.S.K.
A Termite and Soil Insect Killer

FOR OUTDOOR, HOMEOWNER, POST-CONSTRUCTION USE ONLY

Treats 60 linear feet per gallon.

Active Ingredient:

Chlorpyrifos: [0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate] 12.6%

Other Ingredients:* 87.4%

Total: 100.0%

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 11 2000

*Contains petroleum distillates

EPA Reg. No. 769-826

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 769-826
EPA Est. No. 44616-MO-1*

KEEP OUT OF REACH OF CHILDREN
WARNING

FIRST AID

If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

If On Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If In Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

HOTLINE NUMBER

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Telecommunications Network at 1-800-858-7378.

Note To Physician: This product contains an aromatic petroleum solvent and may present an aspiration problem. Chlorpyrifos is a cholinesterase inhibitor. If signs and symptoms of cholinesterase inhibition develop, atropine by injection is antidotal. 2-PAM may also be given in conjunction with atropine, but should never be used alone.

PRECAUTIONARY STATEMENTS
Hazards To Humans and Domestic Animals
WARNING

CAUSES EYE IRRITATION – HARMFUL IF SWALLOWED: Do not take internally. Do not get in eyes, on skin or clothing. Wash thoroughly after handling. Wash contaminated clothing before reuse. Avoid breathing vapors and spray mist. Avoid spraying food crops. Keep away from food, feedstuffs, and domestic water supplies. Keep container closed. Handle concentrate in ventilated area.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

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, 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. Do not contaminate water when disposing of equipment washwaters.

PRECAUTION: Al Usuario: Si usted no les ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

TRANSLATION: (To user: If you cannot read English, do not use this product until the label has been fully explained to you.)

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame. Do not cut or weld container.

AGRICULTURAL CHEMICAL

DO NOT SHIP OR STORE WITH FOOD, FEED, DRUGS OR CLOTHING

DIRECTIONS FOR USE

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

GENERAL: This product is particularly useful for prevention and control of ants, termites, and certain wood destroying insects. For termites, the chemical solution should be adequately dispersed in the soil to provide a lethal barrier between the wood in the structure and termite colonies in the soil. It can also be used for treatment of localized areas of wooden structures, firewood piles and stored lumber to control wood infesting borers, Carpenter Ants and

Carpenter Bees. In addition, this product controls many common pests in lawns and other outdoor areas around the home. Make new dilution for each use. NOTE: 2 Tablespoons equals 1 fl. oz.

**SUBTERRANEAN TERMITES – DIRECTIONS FOR HOMEOWNERS USE
TERMITE CONTROL IN EXISTING STRUCTURES**

Avoid contamination of public and private water supplies by following these precautions. Do not allow a hose or any type of faucet extension to reach into the termite chemical solution while filling or mixing this material with water. Using anti-back-flo equipment will help to insure that the user of this toxic chemical will not contaminate domestic water supplies. Refer to Federal (Federal Housing Administration), state, and local specifications for safe distances of treatment areas from wells.

Do not treat structures that contain cisterns or wells. Soil in the vicinity of wells, cisterns, or ponds should not be treated. For those situations, contact the local Cooperative Extension Service or consult a commercial pest control service.

Do not treat soil that is water saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

Buildings with Basements or Crawl Spaces: First remove all wood debris and wood forms, Around piers, pipes, chimney bases and along foundations of poured concrete, dig a trench 6 inches wide and 4 inches deep.

For brick and block foundations: Dig the trench about 12 inches deep. If footing is more than 12 inches deep, make holes with a crowbar, pipe or a rod about one foot apart that extend from the trench bottom to the top of the footing. Make holes closer in hard packed clay soils. Cover trench with soil after application. NEVER DIG BELOW THE TOP OF THE FOOTING.

Apply the emulsion (or solution) in the trench at a rate of 4 gallons per 10 linear feet per foot of depth. Apply half of this to the back-fill. Concentrate should be applied as a .50% wafer emulsion, Mix 1 gallon of concentrate in 24 gallons of water to produce a .50% emulsion. Likewise, treat along the inside of foundations of crawl-space buildings. Cover treated soil with a thin layer of untreated soil.

For raised porches, terraces, and entrance slabs: Drill holes at one foot intervals, 6 inches from the foundation, and pour one half gallon of emulsion (or solution) into each hole. Retill holes. Slabs with heat ducts or radiating heat pipes should be treated by a commercial pest control operator.

The object is to establish a treated soil barrier, which will prevent termite entry. Other critical areas may also require treatment, particularly if there are inaccessible areas, basements or slab-type construction. It is suggested that you contact the Agricultural Cooperative Extension Service for advice or consult a Commercial Pest Control Service.

RETREATMENT RESTRICTIONS

- 1. Retreatment of subterranean termites should only be made when there is evidence of a re-infestation subsequent to the initial treatment, or there has been a disruption of the chemical barrier in the soil due to construction excavations, landscaping, etc.
- 2. Retreatment may be made to critical areas in accordance with the application techniques described above. This application should be made as a spot treatment to these areas. Annual retreatment of the entire premises must be avoided.

FENCE POSTS – TERMITE PREVENTION: Apply 1 gal. of diluted product per post hole. Pour one half of solution into hole and add the remaining ½ gal. diluted solution to the soil when filling the hole so that all the fill soil is treated to form a protective barrier. **NOTE:** Do not treat structures that contain cisterns or wells. Do not treat soil that is water saturated or frozen. Consult state and local specifications for recommended distances of treatment from well.

TREATMENT FOR WOOD DESTROYING PESTS (OUTDOORS): (Powder Post Beetles, Furniture Beetles, Deathwatch Beetles, Round-headed House Borers, Carpenter Ants, Carpenter Bees). Treat localized areas of infested wood with a paintbrush, use 2 ½ tablespoonfuls per quart of water. Apply emulsion evenly on wood surfaces. Allow to dry and repeat treatment to ensure penetration.
For wood piles and stored lumber: Apply 5 1/3 fl. oz. per gallon or water. Use a sprinkling can and deliver a coarse drenching spray. Do not use in structures occupied by animals, to be used for food purposes or which produce products for human consumption.

HOME INVADING PESTS (OUTSIDE DWELLINGS): Ants, Fleas, Ticks, Earwigs, Crickets, Sowbugs (Pillbugs), Millipedes - For best results apply with a lawn sprayer using 1 ¾ fl. oz. in 15 gallons to treat 500 sq. ft.
NOTE: One half Tablespoonful in 2 gallons water covers 66 sq. ft.

To help prevent infestations of buildings, treat a band of soil 6-10 ft. wide around and adjacent to the building, also the building's foundation to a height of 2-3 feet when pests are active and may find entrance. Do not treat pets with this product. Do not use inside dwellings.

LAWN PESTS: Armyworm, Lawn Moth Larvae (Sod Webworms), Dichondra-Flea beetles, Chinchbugs, Cutworms, European Crane Fly (Larvae), Fiery Skipper Larvae (California and Hawaii only), Tropical Grass Webworms (Hawaii only), Grasshoppers, Crickets, Chiggers, Clover Mites, Earwigs, Fleas For best results, apply with a lawn sprayer, mix 1 ¼ fl. oz. in 15 gallons of water to treat 500 sq. ft. of lawn.

Mow lawn and water well 1-2 days before treatment. Heavy watering should be withheld for 2-3 days following treatment, Spray when pests first appear. Treat entire lawn. Do not attempt to control lawn pests by spot spraying. Repeat treatments may be necessary at 4-6 week intervals. Sprays are most effective if applied during 2 hour period prior to darkness when lawn insects became active. For European Crane Fly control, consult your local Agricultural Extension Service Specialist for proper time to treat in your area.

NOTE: Mosquitoes coming to rest on areas treated for the control of lawn and home invading pests will be killed for varying periods of time after treatment, depending on exposure of treated areas to weathering conditions.

NOTE: Do not use on vegetables or food crops. Do not use on azaleas, camellias, poinsettias, rose bushes or variegated ivy because of possible injury to these plants.

IMPORTED FIRE ANT MOUNDS: Mix 2 Tablespoonfuls (1 oz.) per gallon of water to each individual mound, using a sprinkler can. Thoroughly wet mound and treat a 4 foot diameter circle around the mound. For best results, apply in cool weather or in early morning or late afternoon. Treat new mounds as they appear.

QUEEN FIRE ANT DEATH PROBE DRENCH

For use in the **QUEEN FIRE ANT DEATH PROBE:** Mix 2 tablespoons (1 oz.) in one gallon of water to each individual mound. Invert the **QUEEN FIRE ANT DEATH PROBE** unit and implant the probe deep into the fire ant mound.

QUEEN FIRE ANR DEATH PROBE Drench controls Imported Fire Ants through direct contact, however, application to polygynous (multiple queens) colonies may not completely impair the mound.

For best results, apply in cool weather or in early morning or late afternoon. Treat new mounds as they appear.

STORAGE AND DISPOSAL

Storage: Store in original container only in locked storage area. Store in areas inaccessible to children.

DISPOSAL: Do not reuse container. Wrap and discard in trash.

NET CONTENTS: _____ oz.

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

per EPA letter 5/22/00