Mrs. Kelly K. Rahn NCH Corporation 2727 Chemsearch Boulevard Irving, Texas 75062

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Subject: Revised Labeling or Marketing Dichloron L.O. EPA Registration Number 1769-330 Your Application Dated August 30, 1996

Dear Ms. Rahn:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable provided that you make the labeling changes indicated below before you release the product for shipment bearing the amended labeling:

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Revise the environmental hazards section to:

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. For terrestrial uses, do not apply directly to water, or 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.

(The paragraph beginning "This pesticide is toxic to bees..." may remain as written.)

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

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Dennis H. Edwards, Jr. Product Manager (19) Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

LEFT PANEL

CHEMSEARCH

DICHLORON L.O. (Bulk) Low Odor Insecticide

ACTIVE INGREDIENTS:

* U.S. Patent No. 3,244,586

- ** Equivalent to 0.23 pounds per gallon.
 *** Equivalent to 1.2% (butylcarbityl)
 (6-propylpiperonyl) ether and 0.3%
 related compounds.
- **** Contains Aliphatic Petroleum Hydrocarbons

Controls Pests of Households, Turf and Ornamental Plants. Also recommended for Houseflies and area control of ticks and chiggers.

For commercial, industrial or institutional use only. Not for sale to individuals for personal use or storage in or around the home. For use in commercially maintained dwelling units, including but not limited to schools, housing authorities, apartments, golf courses, health care facilities and parks.

KEEP OUT OF REACH OF CHILDREN

WARNING:

change/addit.

(See side panel for additional warnings.)

EPA Registration No. 1769-330

NET CONTENTS:

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Do not breathe vapors or spray mist. Wash thoroughly after handling. Wash contaminated clothing before reuse. Avoid spraying food crops. Keep away from food,

ACCEPTED with COMMENTS in EPA Letter Dated Under the Federal Masteleide. Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 1769-330

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feedstuffs and domestic water supplies. Keep container closed. Handle concentrate in a well-ventilated area. NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine by injection is the preferable antidote. Oximes, such as 2-PAM, may or may not be therapeutic, but it is recommended they not be used in place of atropine. ENVIRONMENTAL HAZARDS: This product is toxic to fish, birds and other wildlife. Do not apply directly to water.

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Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of waste. Shrimp and crab may be killed at application rates recommended on the label. Do not apply where these are important resources. Apply this product only as specified on the label.

This pesticide is toxic to bees exposed to direct treatment or to residues remaining on the treated area. Do not apply when bees are actively visiting the crop, cover crop, or weeds blooming in the treatment area. Applications should be timed to provide the maximum possible interval between treatment and the next period of bee activity.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. If possible, vomiting should be induced under medical supervision. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Apply artificial 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 immediately.

CENTER PANEL

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

STORAGE: 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.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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DIRECTIONS FOR USE:

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

For use on plants intended for aesthetic purposes or climate modification and being grown in interior plantscapes, ornamental gardens or parks, or on golf courses or lawns and grounds. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

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INDOOR PESTS: For spot application in industrial plants, municipal buildings, schools, motels, hotels, apartments, non-food areas of food handling establishments, hospitals and health care institutions.*

NON-FOOD AREAS: Includes garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

To control cockroaches (including strains resistant to certain other insecticides), ants, clovermites, crickets, firebrats, silverfish, spiders, confused flour beetle, saw-tooth grain beetle, indian flour moth, and red flour beetle: Use 1 part DICHLORON L.O. to 11 parts of water to control light infestations and 1 part_DICHLORON L.O. to 5 parts of water to quickly reduce heavy infestations. For spot treatment, apply as a coarse spray or with a paint brush to localized areas where these pests are found or normally occur, including dark corners of rooms and closets; cracks and crevices along walls, along and behind baseboards; beneath and behind sinks, stoves, refrigerators and cabinets; around plumbing and other utility installations. For ants, apply to ant trails, also around doors and windows and wherever else these pests may find entrance. For clover mites, use the 1 to 5 dilution only.

NOTE: A period of 4 to 7 days is normally required for maximum effect on cockroaches.

FOOD HANDLING ESTABLISHMENTS: Places other than private residences in which exposed food is held, processed, prepared or served.

FOOD AREAS: APPLICATION LIMITED TO CRACK AND CREVICE TREATMENT ONLY: Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas when food is exposed and facility is in operation also considered food areas. Mix 1 part DICHLORON L.O. to 11 parts water to control light infestations; mix 1 part DICHLORON L.O. to 5 parts water to quickly reduce heavy infestations. Apply in small amounts directly into cracks and crevices using equipment capable of delivering a pin stream of insecticide in points between different elements of construction, between equipment and floor openings leading to voids and hollow spaces in walls, equipment legs and bases, where cockroaches, crickets, firebrats, silverfish, spiders, confused flour beetle, saw-tooth grain beetle, indian flour moth and red flour beetle hide. Do not apply this product in conduits, motor housings, junction and switch boxes or other electrical equipment because of possible shock hazard. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air.

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surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

SERVING AREAS: Facilities where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held, Mix 1 part DICHLORON L.O. to 11 parts water to control light infestations and 1 part DICHLORON L.O. to 5 parts water to quickly reduce heavy infestations. Apply as a spot treatment to selective surfaces such as baseboards, under elements of construction and into cracks and crevices. Avoid treating surfaces likely to be contacted by food. Do not apply when facility is in operation or foods are exposed.

WARNING: (Pest Indoors): For Spot Application Only. Do not use in poultry houses or other animal buildings. Do not allow spray to contact food, feedstuffs and water supplies. Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated by application of this product. Do not allow children or pets to contact treated surfaces until spray has dried. Remove pets and cover fish bowls (tanks) before spraying. OUT-OF-DOOR PESTS: Houseflies: To reduce the annoyance of houseflies, dilute DICHLORON L.O. at 1 gallon to 11 gallons of water and spray outside surface of windows, door frames around garbage cans, trash bins, etc., where houseflies are a problem. Repeat treatment when effectiveness diminishes.

LAWN PESTS: To control ants, armyworms, brown dog ticks, chiggers, chinch bugs, crickets, cutworms, earwigs, fleas, grasshoppers and sod webworms (lawn moths), dilute 1 gallon of DICHLORON L.O. with sufficient water to cover 10,000 sq. ft. Apply as a coarse, low-pressure spray using suitable application equipment. Thoroughly water immediately after treatment to wash the insecticide into the turf except for sod webworms. For sod webworms delay watering or mowing the treated area for 12 to 24 hours after treatment. For best results, the lawn should be moist at the time of treatment, and care should be taken to obtain complete and uniform coverage of pest infested areas. Spray when pests first appear; re-treat when needed. To control turfgrass (hyperodes) weevils: Use 1 gallon diluted in sufficient water per 5,000 sq. ft. Spray suspected problem areas in mid-April and again in mid-May. To control Japanese beetle larvae and European chafers apply as with hyperodes when grubs are young and actively feeding near surface, usually in late July and August. Immediately after spraying for grubs, irrigate the treated area with 1/2 to 1 inch of water to wash the insecticide into the underlying soil. 9

RIGHT PANEL

Chemsearch Division of NCH Corporation 2727 Chemsearch Blvd. Irving, Texas 75062

NCH CORPORATION'S TURF COLOR may be used as a color indicator on turf to aid in a more uniform application. Use according to directions on the TURF COLOR label.

ORNAMENTAL PLANTS: To control bagworms, grasshoppers, mites, spittlebugs, and whiteflies on flowers, shrubs, vines, shade, and flowering trees and evergreens use DICHLORON L.O. at the rate of 1 gallon to 100 gallons of water. To control cutworms, gypsy moth, mealybugs, leafhoppers and exposed thrips, use DICHLORON – L.O. at the rate of 1 gallon to 50 gallons of water. Apply using suitable hand or power spray equipment in a manner to provide complete and uniform coverage of infested plants. Avoid overspraying to the point of excessive runoff. Treat when pests appear and repeat at 7 to 10 day intervals, if needed. NOTE: Do not use on azaleas, camelias, poinsettias, rose bushes or variegated ivy because of possible injury to these plants.

WARNING: (Lawn and Ornamental Plant Pests): Do not spray food crops. Keep children and pets off treated areas until spray has dried. Keep out of lawn and garden fish pools and other bodies of water. NOTE: Mosquitoes coming to rest on areas treated for control of turf and ornamental plant pests will be killed in a period of time varying according to treatment and to exposure of treated areas to weathering conditions. Do not use inside greenhouses or on household-type tropical plants.

AREA CONTROL OF TICKS AND CHIGGERS: Use DICHLORON L.O. to control ticks and chiggers infesting non-cropland areas such as

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roadsides, footpaths and trails, picnic and camping sites, parks and other recreational areas where these pests are present and create a nuisance or possible public health problem. Apply DICHLORON L.O. in water at the rate of 1 gallon per acre (equivalent to 3 fl. oz. per 1000 sq. ft.) using a hydraulic sprayer, mist applicator, knapsack sprayer, or other suitable hand or power spray equipment. Treat low underbrush, grassy areas, weeds and ground surface and debris using enough spray volume to obtain thorough coverage, usually 40 to 100 gallons per acre. 9

ATTENTION: (Area Control of Ticks and Chiggers): Do not allow public use of treated areas during application or until spray has dried.

NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use; but neither this warranty nor any other warranty of MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller; and buyer assumes the risk of any such use.

For medical or environmental emergencies, call 214-438-1381. Not for Resale Made in the USA

TO REORDER: In Texas, call 1-800-442-7950 Outside Texas, call 1-800-527-9921

* Do not use where patients are confined to room or in operating rooms, nurseries, or areas where patients are on oxygen.

EPA Est. No. 4140 CA-1 IN-1 NJ-1 PR-1 TX-1

8/30/96