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JUL - 8 1991

Mr. William Guck High Point Mills 1225 Lehigh Station Rd. Box 400 Henrietta, NY 14467

Subject: Amendment - Revise per Diazinon Registration Standard Turf Line Diazinon 5G Lawn Insect Control EPA Reg. No. 8780-51 Your submission dated June 19, 1991

Dear Mr. Guck:

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) The Diazinon Registration Standard stipulates that diazinon outdoor use products are classified as Restricted 'se due to avian and aquatic toxicity unless they are registered for application by homeowners to the home yard and/or home garden or by commercial applicators only to home yards. You can clarify the intended use site for this product by addition of "For outdoor use on the home lawn" to the front panel. A good location for this addition would be just after "Treats up to 12,000 square feet".
- 2) Delete "for general lawn insect control, higher rates are for white grubs and for use on heavy lawns (see directions for use)" because, based on avian toxicity studies, Ciba-Geigy is supporting only a single lawn application rate regardless of the pests to be controlled or type of lawn. For 5% granular diazinon products, that rate is 2 lbs. of product per 1,000 sq. ft. of lawn.
- 3) In the front panel list of pests, revise "Bermuda Mites" to "Bermudagrass Mites" and "Lawn Montas" to "Lawn Moths".
- 4) Under the heading "OVERALL LAWN APPLICATION", for consistency capitalize the "A" of armyworms.

5) In the "Precautions" under "Overall Lawn Application, revise the end of the fourth sentence to read "... hazards to birds and waterfowl.". Also in this same section, revise the sixth sentence to read as follows:

Where thorough watering is recommended in the directions, or if waterfowl, i.e., ducks or geese, can be expected to enter the treated area after treatment (except spot treatment), water lawn with at least 1/4 inch of water immediately after applying this product, however, stop watering before puddling occurs.

6) In the first paragraph of the overall lawn application directions, delete "For heavy lawns such as St. Augustine grass, application should be increased to 3 lbs. per 1,000 sq. ft.", since the only supported lawn application rate for 5% diazinon granules is 2 lbs. per 1,000 sq. ft. of lawn. Add "Apply when grass is dry." before "Water lawn lightly after application.".

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- 7) Revise the rate given at the beginning of the paragraph on billbug control to read "Apply at the rate of 2 lbs. per 1,000 sq. ft.".
- 8) Revise the spreader setting table to reflect the fact that there is only one application rate, i.e., delete the columns for 2 1/2 lbs. and 3 lbs. per 1,000 sq. ft. of lawn. Since you will not need the three column subheadings based on rate, you may want to revise the right-hand heading to read as follows:

Spreader Setting Number (To deliver 2 lbs. per 1,000 sq. ft.)

9) Based on Ciba-Geigy's toxicology data submitted in support of reregistration of their 5% diazinon granular products, and upon which you are relying for reregistration of the subject product, the text of the Hazards to Humans and Domestic Animals should be revised as follows:

Harmful if swallowed or absorbed through skin. Causes moderate eye injury. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating or smoking. Do not store near food or feed products. Food utensils such as spoons or measuring cups should not be used for food purposes after use in measuring pesticides.

- 10) Reflecting the toxicology data you are relying upon to support reregistration of this product, in the Statement of Practical Treatment add "Get medical attention." to the end of the "If on skin" advice. In this same section, at your option, you may elect to delete the "If inhaled" advice, since the Ciba-Geigy's data showed their 5% diazinon granular products are in Toxicity Category IV by this route of exposure.
- 11) Revise the Environmental Hazards text to read as follows.

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This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Because of the migratory habits of certain Atlantic Coast waterfowl, do not apply this product to lawns in Nassau County, New York, between November 1 and May 20. Do not exceed maximum permitted label rates. Application rates above those recommended significantly Avoid increase potential hazards to birds and waterfowl. overlapping of granules. For lawns, where irrigation (watering) is recommended in the directions, or if waterfowl, i.e., ducks or geese, can be expected in the treated area after treatment (except spot treatment), water lawn with at least 1/4 inch of water immediately after applying this product, however, stop watering before puddling occurs. 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.

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 deadline imposed by the Diazinon Registration Standard should be the revised amended label.

Sincerely yours,

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

DRAFT LABEL FOR 8780-51

TURF LINE Diazinon 5G. Lawn Insect Control.

Treats up to 12,000 square feet for general lawn insect control, higher rates are for white grubs and for use on heavy lawns. (See directions for use.)

This product must not be used on golf courses and sod farms.

25 lbs. net weight

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 8780-51 EPA Est. No. 8780-NY-1

Manufactured By: HIGH POINT MILLS

A Division of Progressive Lawn Research, Inc.

Henreitta, NY 14467

TURF LINE a trademark of HIGH POINT MILLS

TURF LINE DIAZINON 5G. LAWN INSECT CONTROL KILLS:

Ants
Armyworms
Bermuda Mites
Billbugs
Brown Dog Ticks
Chiggers
Chinch Bugs
Clover Mites
Crickets
Cutworms
Digger Wasps

Earwigs
Fleas
Lawn Months
Leafhoppers
Millipedes
Springtails
Sod Webworms
Sowbugs

White Grubs Of: A . European Chafes

. Japanese Beetle

Southern ChaferSee back Panel

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL - 8 1991

Under the Pedal of the Fungind and Rode time amended, for the posticid registered under EPA Reg. No. 8780-51

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DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire <u>Directions</u> for <u>Use</u> and the <u>Conditions</u> of <u>Sale and Warranty</u> before using this product.

Conditions of Sale and Warranty

The <u>Directions</u> for <u>Use</u> of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, of other unintended consequences may result because of such factors as weather conditions, presence of other materials, of the manner of use or application all of which are beyond the control of High Point Mills or the Seller. All such risks shall be assumed by the Buyer.

HIGH POINT MILLS warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the <u>Directions for Use</u> subject to the inherent risks referred to above. <u>HIGH POINT MILLS makes no other express or implied warranty of Fitness of Merchantability or any other express or implied warranty. In no case shall High Point Mills or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. High Point Mills and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Marranty, which may be varied only by agreement in writing signed by a duly authorized representative of HIGH POINT MILLS.</u>

Directions for Use

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

OVERALL LAWN APPLICATION

To control the following lawn insects on both grass and dichondera lawns: Chincg Bugs, Earwigs, Ants, Lawn Moths (Sod Webworms), Bermuda Mites, Crickets, armyworms, Brown Dog Ticks, Chiggers, Clover Mites, Fleas, Leafhoppers, Sowbugs, Millipedes, and Springtails (Collembola).

Precautions: Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Apply this product only as specified on this label. Because of the migratory habits of certain waterfowl, do not apply in Nassau County, New York between November 1 and May 20. Do not exceed maximum permitted label rates, since rates above those recommended significantly increase potential hazards to birds. Avoid overlapping treated areas. If waterfowl, i.e., ducks, geese, can be expected to enter the treated area after treatment (except spot treatments), water lawn with at least 0.25 inch water immediately after application, however, stop watering before puddling occurs.

Apply at the rate of 2 lbs. per 1,000 sq. ft. (an area 20' X 50'). For heavy lawns such as St. Augustine grass, application should be increased to 3 lbs. per 1,000 sq. ft. Water lawn lightly after application.

To control the following insects in the lawns:

Billbugs, White Grubs of European Chafer, Japanese Beetle & Southern Chafer.

Apply at the rate of 2½ lbs. per 1,000 sq. ft. Water lawn thoroughly after application. For grub control make application any time between late July and early October. For Billbug control, apply when activity is first observed or when chewed or brown grass indicates damage from these insects. Repeat as necessary.

TO CONTROL HYPERODES WEEVIL

Apply 2 lbs. per 1,000 sq. ft. Water grass thoroughly after application. Treat problem areas in Mid-April and again Mid-May.

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IT IS RECOMMENDED THAT ALL APPLICATIONS BE MADE WITH A FERTILIZER SPREADER.

SPREADER SETTINGS FOR OVERALL LAWN APPLICATIONS:

NOTE: The spreader settings listed are approximate. Accurately weigh a few pounds into your spreader and apply to a measured area. Then adjust your spreader setting in order to insure the correct rate of application.

Spreader Make	Spreader setting number		
	2 lbs. per 1,000 sq. ft.	2½ lbs. per 1,000 sq. ft.	3 lbs. per 1,000 sq. ft.
Scott Model PF-4	4	41/2	5
Cyclone Model Bl Rotary	413	4 ³ 4	5

SPOT TREATMENT

Ants: Apply 14 teaspoons over and around each individual ant hill.

Digger Wasps: Apply 14 teaspoons in and around each ground nest opening. Make application about dusk when the wasps are not active.

BAND TREATMENT AROUND FOUNDATION

The following insects are commonly found around or near the foundation of houses as well as in the lawn. Certain of these insects may even enter the house.

Ants, Brown Dog Ticks, Clover Mites, Crickets, Earwigs, Fleas, Millipedes, Sowbugs, Springtails (Collembola).

For control of these insects, apply a five-foot band of Turf Line Diazinon 5G. Lawn Insect Control next to the foundation of the house. Distribute the granules uniformly using a rate of 3.2 oz. for each 5' X 20' area to be treated.

STORAGE AND DISPOSAL

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Storage: Store in original container in a cool, dry, wellventilated area. Store product in an area inaccessible to children and domestic animals. Do not store near fertilizers, herbicides, other insecticides, seeds, food, or feed.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Container Disposal: Do not reuse empty bag. Discard bag in trash.

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 wastes. In the event of a major spill, fire or other emergency, call 1-716-334-4574 day or night.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Wash thoroughly after handling and before eating or smoking. May cause contact sensitization following repeated contact with skin of susceptible individuals. Avoid repeated contact with skin. I f sensitization reactions result, consult a physician. Do not store near food or feed products. Food utensils such as spoons or measuring cups must not be used for food purposes after use in measuring pesticides. Do not contaminate ornamental fish ponds. Do not allow children or pets on treated areas until granules have been watered into the soil and grass or soil is dry.

Statement of Practical Treatment

If swallowed: call a physician immediately. Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth if person is unconscious or convulsing.

If inhaled: Remove victim to fresh air and apply artificial respi.ation, if indicated.

If on skin, wash promptly with soap and water. Rinse thoroughly.

If in eyes, rinse eyes with plenty of water and call a physician immediately.

Note to Physician

This product is an organiphosphate 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.

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Environmental Hazards

This product is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl feeding or drinking on
treated areas may be killed. Because of the migratory habits
of certain Atlantic Coast waterfowl, do not apply this product to lawns in Nassau County, New York, Between November 1
and May 20. Do not exceed maximum permitted label rates.
Application rates above those recommended significantly
increase potential hazards to birds and waterfowl. Avoid
overlapping granules. Where irrigation (Watering) is recommended in the directions or if waterfowl, i.e., ducks or
geese, can be expected in the treated area after treatment
(except spot treatment), apply a minimum of 0.25 inch of
water immediately after applying this product. Stop irrigation before puddling occurs. Keep out of lakes, streams,
ponds, tidal marshes and estuaries.

Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). 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.