

8780-56 139  
Mr. William Guck  
High Point Mills  
1225 Lehigh Station Rd.  
Box 400  
Henrietta, NY 14467

JUL - 9 1991

Subject: Amendments - Decrease Signal Word and  
Revise per Diazinon Registration Standard  
Turf Line Arthroban Triple Action #4  
EPA Reg. No. 56819-15 *Transferred to 8780-56*  
Your submission dated February 23, 1990

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) It is understood that the decreasing of the Signal Word is associated with the change of fertilizer analysis from 15-2-4 (31.8% urea) to 13-2-5 (27.6% urea). This reduction in the urea content to below 30% (identified as the trigger for the previous WARNING Signal Word) was originally submitted on August 5, 1981 and was approved by the Agency September 14, 1981. Presumably you have now deleted the previous Basic Formula (31.8% urea). The 31.8% urea formula was identified as the Basic Formula in your CSF's dated May 13, 1983, March 13, 1985, and June 18, 1985, while the 27.6% urea formula had been identified as only an Alternate Formula in all of those submissions. It is noted that your action on the companion product, EPA Reg. No. 56819-13, appears to be directly opposite of what you have done for this product, i.e., you have retained the 31.8% urea formula while apparently discarding the alternate formulas with urea content under 30%. What is the reason for this conflicting actions on these two products?
- 2) The Diazinon Registration Standard stipulates that Diazinon outdoor use products are classified as Restricted Use due to avian and aquatic toxicity unless they are registered for

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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 5,000 square feet".

- 3) Correct the spelling of "Nitrogen" in the front panel "Guaranteed Analysis".
- 4) Under the heading "WHAT THIS PRODUCT IS FOR", correct the spelling of "Yellow Foxtail".
- 5) In the "Precautions", 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 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) Under the heading "WHERE TO USE", delete ", or other turf areas not used for pasture or hay". Recommending use of this product on any turf other than home lawns would render this a Restricted Use product.
- 7) 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 a 2.1% granular diazinon product, that rate would be 4.76 lbs. of product per 1,000 sq. ft. of lawn. That rate, and appropriately revised spreader setting recommendations, must appear on your label. If such a reduced application rate will not supply enough of the herbicide component of this product, then you will have to revise the formula accordingly such that adequate weed control will occur when the product is applied at 4.76 lbs. per 1,000 sq. ft. If reformulation is necessary, you will have to submit a revised CSF and product chemistry data as required under the Diazinon Registration Standard.
- 8) You may delete "Food utensils such as tablespoons or measuring cups must not be used for food purposes after use in measuring pesticides." from the "Hazards to Humans and Domestic Animals" text since the directions specify that the product is to be applied with a lawn spreader.

9) Revise the Environmental Hazards text to read as follows:

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 increase potential hazards to birds and waterfowl. Avoid 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. Keep 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.

Please note that the master name for this product is "Turf Line Arthroban Triple Action #4". That master product name must appear on the label and should appear in your correspondence regarding this product. "Turf Line Arthroban-s Triple Action #4" (as indicated in your cover letter) is just an additional brand name for this product.

Sincerely yours,

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

TURF LINE Arthroban Triple Action 4.  
Formula for Established Lawns

This Product must not be used on golf courses and sod

ACCEPTED  
for COMMENTS  
in EPA Letter Dated:

Kills Grubs of European Chafer and Japanese Beetles.  
Prevents Crabgrass and Certain Other Weed Grasses.  
Fertilizes the Lawn.

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Treats 5,000 square feet.

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide  
registered under EPA Reg. No.

Net Weight 30 lbs.

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Active Ingredient:

Diazinon: O,O-Diethyl O-(2-isopropyl-6-methyl-4-pyrimidinyl)	
phosphorothioate	2.10%
N-butyl-N-ethyl-a,a,a-trifluoro-2,6-dinitro-p-toluidine	0.80%
Inert Ingredients	97.10%
Total	100.00%

Guaranteed Analysis

Total Nitrogen (N)	13.0 %
Available Phosphoric Acid ( $P_2O_5$ )	2.0 %
Soluble Potash ( $K_2O$ )	5.0 %
Magnesium (Mg)	0.5 %
Sulfur (S)	1.0 %
Iron (Fe)	0.2 %
Boron (B)	0.02%
Copper (Cu)	0.05%
Manganese (Mn)	0.05%
Molybdenum (Mo)	0.0005%
Zinc (Zn)	0.05%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

DO NOT APPLY TO NEWLY SEEDED LAWNS

Manufactured By: HIGH POINT MILLS

A Division of Progressive Lawn Research, Inc.  
Henreitta, NY 14467

EPA Est. No. 8780-NY-1  
EPA Reg No. 56819-15

TURF LINE, ARTHROBAN-S,  
& NPK FORTIFIED FORMULA  
are trademarks of HIGH  
POINT MILLS.

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DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product. If terms are not acceptable, return the unopened product container at once.

Conditions of Sale and Warranty

) The Directions for Use 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, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or 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 Directions for Use subject to the inherent risks referred to above. 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 Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of High Point Mills.

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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.

#### WHAT THIS PRODUCT IS FOR:

Controlling existing infestations, in the turf of grubs (larvae) of the European Chafer and Japanese Beetle. Preventing the successful germination of Crabgrass (Hairy & Smooth), Yellow Fowltail, Goosegrass, and Barnyardgrass.

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 treatment), water lawn with at least 0.25 inch water immediately after application, however, stop watering before puddling occurs.

#### WHERE TO USE:

Use only on the established grass of home lawns, or other turf areas not used for pasture or hay. Do not use on newly seeded areas, edible food crops, bentgrass, or dichondra turf.

#### WHEN TO USE:

Apply in the Spring before May 15, but not later than the drop of Forsythia blossoms. Do not apply when wind conditions would cause drift from areas being treated. Wait 60 days before any reseeding of the treated area.

#### HOW TO USE:

Rake lawn if necessary to remove extraneous material. DO NOT rake or disturb the soil surface after application. Spread evenly over the lawn with a good fertilizer spreader. The settings given in the table are intended to be a guide in setting your spreader. Due to variations in the performance of individual spreaders, and the difference in walking speed of applicators, it is important to make certain that you are applying the correct amount of material. The correct use rate for this product is 6 lbs. per 1,000 sq. ft. Water immediately after spreading using 30 gallons per 1,000 sq. ft.

SPREADER SETTINGS

<u>Make of Spreader</u>	<u>Number</u>
Turf Line Rotary	3.75
Cyclone Rotary	3.75
Scott Drop Type	5.0
Scott Rotary	F

## STORAGE AND DISPOSAL

Storage: Store in original container in a cool, dry, well-ventilated area inaccessible to children and domestic animals. Do not store near fertilizers, herbicides, seeds, food, or feed. Do not reuse bag. Discard bag in trash.

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.

## 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 smoking or eating. May cause contact sensitization following repeated contact with skin of susceptible individuals. If sensitization reactions result, contact a physician. Do not store near food or feed products. Food utensils such as table-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 onto the treated area until granules have been watered in and the grass has dried.

### 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 respiration 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:

**BEST COPY AVAILABLE**

This product is an organophosphate 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 fish and wildlife. Birds feeding on treated areas may be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and pot-holes). Runoff may be hazardous to aquatic organisms in neighboring areas. Collect or incorporate granules that are spilled during loading or are visible on soil surfaces in turn areas. Do not contaminate water by disposal of equipment washwaters.

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. Rates above those recommended significantly increase potential hazards to birds and waterfowl. Avoid overlapping of granules. Keep out of lakes, streams, ponds, tidal marshes and estuaries. 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.