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

JAN 8 2001

Dawn L. Walters
The Andersons Lawn Fert. Div. Inc.
PO Box 119
Maumee, OH 43537

Subject: TwinLight Dursban Turf Insect Killer
EPA Reg. # 9198-127
label amendment submitted 12/18/00
accepted with comments

Dear Ms. Walters:

The revised labeling reference to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided you incorporate the changes required by the Agency as listed below.

| Topic | Action required |
|---|--|
| Front Panel | Replace the phrase "Statement of Practical Treatment" with: "FIRST AID" |
| Precautionary Statements Environmental Hazards | Remove the following text from the environmental hazards section: "Do not allow people, especially children or pets on treated turf until insecticide is washed off the turf into the soil and turf is completely dry." |

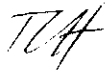
| Topic | Action required |
|--------------------|--|
| Directions for Use | 1) Remove the text "General Classification." 2) Following each occurrence (3 total) of the sentence "Wash granules into soil with 30 gallons of water per 1,000 sq.ft." add the following text: "Do not allow people, especially children or pets, on treated turf until insecticide is washed off the turf into the soil and turf is completely dry." |

Submit three (3) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of your label stamped "accepted with comments" is enclosed for your records.

If you have any questions please contact me at (703) 308-9423 or Harris.Thomas@EPA.gov.

Sincerely yours,



Thomas C. Harris
Insecticide / Rodenticide Branch
Registration Division (7505C)
Office of Pesticide Programs

enclosure

(Front Panel)

Twinlight Dursban® Turf Insect Killer

For use on turf on Golf Courses, Road Medians and Industrial Plant Sites Only

ACTIVE INGREDIENT:

Chlorpyrifos [0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate] 2.32%

INERT INGREDIENTS 97.68%

Total ... 100.00%

DURSBAN® is a Trademark of DowElanco

Covers up to 25,000 square feet
Net Weight 25 lbs. (11.3 kg)

KEEP OUT OF REACH OF CHILDREN

WARNING

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED - Remove victim to fresh air and apply respiration if indicated.

IF ON SKIN - Wash thoroughly with soap and water. Rinse thoroughly.

IF IN EYES - Rinse eyes for at least 15 minutes with water and call a physician immediately.

NOTE TO PHYSICIAN: Active ingredient is a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote.

SEE BACK PANEL FOR ADDITIONAL CAUTIONS.

EPA Reg. No. 9198-127
EPA Est. No. 9198-OH-1

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 8 2001

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

9198-127

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(Back Panel)

Net Weight 25 lbs. (11.3 kg)

Twinlight Dursban® Turf Insect Killer

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS WARNING

Avoid breathing dust. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin eyes or clothing. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Keep out of any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from area treated.

Do not allow people, especially children or pets on treated turf until insecticide is washed off the turf into the soil and turf is completely dry.

DIRECTIONS FOR USE

GENERAL CLASSIFICATION

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

STORAGE: Keep in original container and place in locked cool storage area. Keep out of reach of children, pets and other animals. Avoid moisture. Avoid contamination of feed or foodstuffs by storage and disposal. Open burning and dumping prohibited. Do not reuse empty container.

PESTICIDE DISPOSAL: Pesticide that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures.

CONTAINER DISPOSAL: Do not reuse empty container. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Wrap empty container in several layers of paper and place in trash collection.

CHINCH BUGS, SOD WEBWORMS, ANTS, EARWIGS, CRICKETS, CUTWORMS, BROWN DOG TICKS and SOWBUGS (PILLBUGS)-Spread uniformly at a rate of 1 pound per 1,000 sq. ft. In northeastern states, make first application in May or June or when insects first appear. Re-treat as needed, usually in July or August.

Consult your Extension Service Specialist as to exact timing of applications.

(Wash granules into soil with 30 gallons of water per 1,000 sq. ft.)

HYPERODES WEEVIL-Apply uniformly at a rate of 1 pound per 1,000 sq. ft. Make the first application of suspected area in mid-April followed by second application 30 days later.

(Wash granules into soil with 30 gallons of water per 1,000 sq. ft.)

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(Back Panel)

JAPANESE BEETLE GRUBS and EUROPEAN CHAFER GRUBS-Depending on infestation, apply uniformly at a rate of 1 pound per 1,000 sq. ft. For Grub control, apply anytime between late July and early October when grubs are young and feeding near surface. After application sprinkle turf thoroughly to wash the insecticide off the grass and onto the soil.

(Wash granules into soil with 30 gallons of water per 1,000 sq. ft.)

Maximum application rate is 1 lb. ai per acre (1 pounds of product per 1,000 square feet).

Approximate Spreader Settings
(available at final printing)

The age, condition of spreader, speed of operation and roughness of turf will cause variations in rates applied. These suggested settings are for your guidance only.

WARRANTY STATEMENT

Seller makes no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and or handling of this material when such use or handling is contrary to label instruction. (AP010394/RVmoa082200)

Manufactured by:
The Andersons Lawn Fertilizer Division, Inc.
d/b/a Free Flow Fertilizer
PO Box 119
Maumee, OH 43537

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| Date Printed | 8/22/00 |
| Date Approved | |
| Supersedes | 01/03/94 |
| Label Change | MOA: remove all uses but golf courses, road medians, industrial sites, fire ants/max application rate 1 lb ai/acre |
| Filename | 9198-127 |
| Label code | (AP010394/RVmoa082200) |