

APR - 4 1996

Ms. Kresti Lyddon
LESCO, Inc.
20005 Lake Road
Rocky River, OH 44116

Dear Ms. Lyddon:

Subject: Amendment- Revise per Diazinon Registration Standard,
Specify as Restricted Use Product
LESCO 30-5-7 Plus Diazinon
EPA Registration Number 10404-14
Your submission dated October 10, 1995

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), are acceptable provided that you:

- 1) Submit and/or cite all data or other materials required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
- 2) Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Revise the Hazards to Humans and Domestic Animals to read as follows:

Harmful if swallowed or absorbed through skin. Causes moderate eye injury. Avoid contact with skin, eyes, or clothing. May cause contact sensitization following repeated contact with skin of susceptible individuals. If sensitization reactions result, contact a physician. Wash thoroughly with soap and water after handling and before eating or smoking. Do not store near food or feed products. Do not contaminate ornamental fish ponds. Do not allow children or pets onto treated areas until granules have been watered into the soil and the grass is dry.

- b. In the Statement of Practical Treatment, revise the If swallowed advice to read as follows: 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 if person is unconscious or convulsing.
- c. Also in the Statement of Practical Treatment, add "Get medical attention." to the end of the If on skin advice.
- d. At the end of the Statement of Practical Treatment, i.e., after the If in eyes advice, add a NOTE TO PHYSICIAN heading with text as follows: 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.
- e. Replace the Environmental Hazards text with the following:

This product is highly toxic to birds, fish, and other wildlife. especially waterfowl (ducks or geese), 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. Avoid overlapping granules. Follow all watering instructions in the directions for use, however, stop watering before puddling occurs. For lawns, do not apply this product to sites occupied by waterfowl, or within 75 feet of any body of water which may attract waterfowl, such as ponds or lakes. 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 fish and other 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.

- f. Directly under the sentence "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." (under the heading DIRECTIONS FOR USE) add the following heading and text in a box outline:

OVERALL LAWN APPLICATION

Special Precautions To Reduce Risks to Birds

Birds, especially waterfowl (ducks or geese) feeding on treated areas may be killed. To reduce risks to birds:

1. Do not treat areas larger than 15,000 sq. ft.
 2. Because of the migratory habits of certain waterfowl, do not apply in Nassau County, New York between November 1 and May 20.
 3. Do not exceed maximum permitted label rates, since application rates above those recommended significantly increase potential hazards to birds, especially waterfowl.
 4. Avoid overlapping treated areas.
 5. Follow all watering instructions in the directions for use, however, stop watering before puddling occurs.
 6. Do not apply this product to sites occupied by waterfowl, or within 75 feet of any body of water which may attract waterfowl, such as lakes or ponds.
 7. If it is necessary to repeat application, wait a minimum of 3 weeks between applications. Make no more than 4 applications per year.
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- g. Is there a reason why the listing of pests controlled appears in two places (at the bottom of the left column and the top of the right column)? Assuming that a single consolidated list is adequate, retain the heading Overall Lawn Applications and its associated pests listing but add Billbugs, Digger Wasps, and White Grubs of - Japanese beetle, European chafer, Southern chafer to the listing (the same pests are not included in both lists). Also, correct "Bermuda mites" to "Bermudagrass mites", and "Sow bugs" to "Sowbugs" in that pests listing.
- h. Based on Ciba-Geigy's wildlife data, only a single application rate can be used for each lawn product, regardless of the type of grass or pests to be controlled. For your 3.33% diazinon product that rate is 3 pounds per 1,000 sq. ft.. Since only a single even poundage rate is appropriate, revise the first rate given (under Apply LESCO Diazinon 3.33% + 31-5-7 Fertilizer) to read "Apply at a rate

of 3 pounds per 1,000 sq. ft. (an area of 20 ft. x 50 ft.).", i.e. delete the decimal and following zero. Also, under Billbugs, etc., revise the rate from 3.6 lbs. to 3 lbs. and under Hyperodes Weevil, revise 3.0 to just 3.

- i. Since only a single 3 pound rate is allowed, delete the second line (i.e., the 3.6 pound line) from under the spreader setting directions for the LESCO Rotary Spreader and for the Cyclone spreader. Revise 3.0 to just 3 for the first line of both spreaders.
- J. Please note that the master name of record for this product is LESCO 30-5-7 Plus Diazinon, and that this is the name that should appear on labeling submitted for approval (unless you elect to change the master name). You are, of course, free to market this product under any of the various alternate brand names that are contained in this products' registration file, including the one shown on this label submission.

A stamped copy of the label is enclosed for your records. Please note that diazinon products may not be released into channels of trade after August 31, 1995 unless they bear accepted labeling amended in accordance with the Diazinon Registration Standard, i.e., this product may not be released for shipment unless it bears the label being accepted at this time, revised in accordance with the comments in this letter.

A revised Confidential Statements of Formula (CSF), must be submitted for this product. The CSF must include upper certified limits for the impurities of toxicological concern as identified in the Diazinon Registration Standard (TEPP, O,S-TEPP, S,S-TEPP, and oxo-diazinon), and should include signed and dated certification statements relative to FIFRA Sec 12 (a)(1)(C) and the method of arriving at the certified limits for the impurities (i.e., reliance on Ciba-Geigy's analysis, or another producer's analysis if another source of diazinon is used) and addressing data requirements under Guidelines 61-3 and 61-2b. If you have more than one diazinon supplier, separate CSF forms should be submitted for each supplier since the levels of toxicologically significant impurities are different for each diazinon technical and the certification of analyses are only appropriate to each supplier's own material. The text of these certification statements is as follows:

I hereby certify that, for the purposes of FIFRA Sec.12(a)(1)(C), the description of the composition of [your product's name], EPA

Reg. No. [insert correct number for your product], refers to the composition set forth on this Statement of Formula and supporting materials. This description includes the representation that (1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower

certified limit specified for that ingredient in this Statement of Formula; and (2) if the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

I certify that the upper certified limits for the impurities listed on this Statement of Formula are based on [your supplier's name] analysis and certification of limits for this product based on [name of source product that your supplier has analyzed]. I further certify under Section 61-3 and 61-2(b) that there are no chemical reactions between diazinon and/or its impurities with the intentionally added inerts.

If you do not already have the impurities information required on the CSF, please immediately contact your supplier(s) directly.

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (7505C)

NOT FOR USE on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

To Control Both Soil and Surface-Feeding Insects
 Ready-to-Use - Contains 3.33% Diazinon
 This product must not be used on golf courses or sod farms.

Active Ingredient:
 O,O-diethyl O-(2-isopropyl-6-methyl-4 pyrimidinyl)
 phosphorothioate 3.33%
 Inert Ingredients: 96.67%
 Total 100.00%

GUARANTEED ANALYSIS

Total Nitrogen (N) 31.00%
 1.95% Ammoniacal Nitrogen
 29.05% Urea Nitrogen*
 Available Phosphate (P₂O₅) 5.00%
 Soluble Potash (K₂O) 7.00%
 Sulfur (S) Total 2.85%
 2.85% Free Sulfur (S)

DERIVED FORM: Poly Coated Sulfur Coated Urea, Urea, Diammonium Phosphate, Muriate of Potash.
 Chlorine (Cl) Max. 4.00%
 * 8.35% Slowly Available Nitrogen from LESCO™ Poly Plus® Sulfur Coated Urea.
 Brush off walks and painted surfaces following application to avoid discoloration.

Overall Lawn Application: LESCO Diazinon 3.33% + 31-5-7 Fertilizer controls the following lawn insects on both grass and dichondra lawns:

Ants Chiggers Crickets Lawn moths Millipedes
 Armyworms Chinch bugs Cutworms (Sod Webworms)
 Bermuda mites Clover mites Earwigs Leafhoppers Sow bugs
 Springtails (Collembola)

STORAGE AND DISPOSAL

Pesticide Storage: Keep out of reach of children and animals. Store in original container only. Store in a cool, dry place and avoid excess heat. Carefully open container. After partial use, fold and roll back bag, clamp and close tightly. Do not put concentrate or dilute material into food or drink containers. Do not contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal.

In Case of Spill: Avoid contact, isolate area, and keep out animals and unprotected persons. Confine spills. If dry material: Cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

Pesticide Disposal: Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your state Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Apply LESCO Diazinon 3.33% + 31-5-7 Fertilizer to lawn with fertilizer spreader at the rate shown. Application should be made when grass is dry. Water lawn lightly after application. Repeat as necessary. Apply at a rate of 3.0 pounds per 1,000 sq. ft. (an area of 20 ft. x 50 ft.)

Billbugs, White Grubs of Japanese beetle, European chafer, and Southern chafer: Apply 3.6 lbs./1,000 sq. ft. of lawn. 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.

Hyperodes Weevil (New York Only): Apply 3.0 lbs./1,000 sq. ft. of lawn. Water lawn thoroughly after application. Treat problem areas in mid-April and again in mid-May.

APPROXIMATE SPREADER SETTINGS FOR LESCO ROTARY SPREADER:

#Product/ 1,000 sq. ft.	#N/ 1,000 sq. ft.	#A/A 1,000 sq. ft.	Effective Spreading Width	Third Hole	Approx. Setting
3.0	0.93	4.36	9 feet	1	G
3.6	1.10	5.23	9 feet	1	G 1/2

	Once Over	Twice Over	Spread Width
Cyclone* 3.0 lbs./1,000 sq. ft.	4.75	4.00	7 feet
3.6 lbs./1,000 sq. ft.	5.25	4.50	7 feet

*IMPORTANT: These settings are only approximate. Age, condition of spreader, and operator speed can cause wide variation. Be sure to calibrate your spreader with each application.

WARRANTY

LESCO warrants that this product conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this product is reasonably fit for its intended purposes. Since timing, method of application, weather, plant and soil conditions, mixture with other chemicals, and other factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

LESCO is a trademark of LESCO, Inc.
 Poly Plus is a registered trademark of LESCO, Inc.

Net Weight: 50 Lbs. (22.72 kg.)
 Made in U.S.A.

EPA Reg. No. 10404-14
 EPA Est. No. 10404-OH-04

F335

Manufactured by: LESCO, Inc.
 20005 Lake Road, P.O. Box 16915
 Rocky River, Ohio 44116

#008564

ACCEPTED
 with COMMENTS
 in EPA Letter Dated

APR - 4 1996

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

10404-14

10/95WP