

10404-81

12/18/2000

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 18, 2000

Stephen M. Jedrzejek
Director of Regulatory Affairs
LESCO, Inc.
20005 Lake Road
Rocky River, OH 44116

Subject: Chlorpyrifos MOU dated June 7, 2000
LESCO 0.97 Dursban Granular
EPA Reg No.: 10404-81
Submission Dated: August 30, 2000

Dear Mr. Jedrzejek:

The revised labeling referenced 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 Agency's conditions as enumerated in this letter below and submit one copy of your final printed label prior to releasing the product for shipment.

- 1) The wording "non-cropland areas" must be deleted from the product label. The only outdoor, non-residential uses allowed for this product are golf course turf, road medians and the industrial plant sites.
- 2) The text "use for crawling insect control outside of warehouses, food handling establishments, commercial and industrial sites" must be revised to read "use for crawling insect control outside of industrial plant sites such as warehouses and food handling establishments." The term "commercial" must be deleted.
- 3) All references of treatment of golf courses must be changed to "golf course turf only."

4) Per the document "Guidance for Formulators of End-Use Products Containing Chlorpyrifos," you must add the text "For Professional Use Only" to your fire ant use directions.

5) It is unclear whether the directions for use on Page 2 ("for use on lawns, parks, golf courses, road medians and industrial site turf areas: apply uniformly to golf courses, road medians and industrial site turf and non-cropland areas using any hand or power operated gravity or rotary type spreader...") refer to control of fire ants. Per the chlorpyrifos MOA, chlorpyrifos can only be used to treat individual fire ant mounds. If these directions were intended to refer to use on fire ants, they must be deleted. If these directions were intended for use on golf turf, road medians and industrial sites, "lawns and parks" must be deleted. This section needs clarification and revision.

6) The homeowner disposal statement must be deleted from the label.

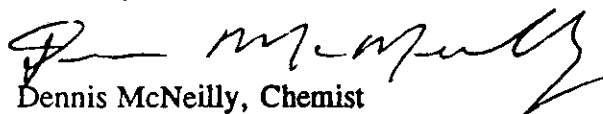
7) The product name currently on the label, Granular Dursban Insecticide, should be revised to reflect the name of record with the Agency, LESCO 0.97 Dursban Granules.

8) Under the Commercial Control section, "Etc." must be deleted from the label when used as follows: FOR USE ON GOLF COURSES, ETC.

Submit one copy of the revised final printed label before releasing the product for shipment. If the conditions enumerated above are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e).

A stamped copy of the label is enclosed for your records. If you have questions about this label review, please contact me at (703) 308-6742 or electronically at McNeilly.Dennis@EPA.gov. You may also contact Judy Loranger at (703)-308-8056 if you have specific questions regarding this letter.

Sincerely,



Dennis McNeilly, Chemist
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure: stamped label

3/4



Granular Dursban® Insecticide

For the Control of Surface Insects such as Chinch bugs*, Fleas*, Brown dog ticks*, Ants, Fire ants*, Sod webworm* (lawn moth), Armyworms and Cutworms.

FOR USE on Golf courses (turf only), road medians and industrial sites only.

Also Controls Centipedes, Clover mites, Crickets, Earwigs, Fiery skipper, Grasshoppers, Leafhoppers, Millipedes, Sow bugs, and Springtails.

*See Specific Directions

1 pound treats up to 415 sq ft

Active Ingredient:	
Chlorpyrifos: O,O-diethyl-O-(3,5,6-trichloro-2-pyridyl) phosphorothioate	0.97%
Inert Ingredients:	99.03%
TOTAL	100.00%

U.S. Patent No. 3,244,586
EPA Reg. No. 10404-81
EPA Est. No. 10404-OH-04(M), 10404-FL-1(S), 33272-OH-1(LOL)
First letter of lot code indicates manufacturing site.

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be harmful if swallowed. Avoid contact with eyes, skin, and clothing. Avoid breathing dust. Wash thoroughly after handling and before eating or smoking. Wash contaminated clothing before reuse. Keep away from food, feedstuffs, and water supplies. As recommended, water lawn after application and allow to dry before permitting children and pets on treated areas.

STATEMENTS OF PRACTICAL TREATMENT

If Swallowed: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. DO NOT induce vomiting or give anything by mouth to an unconscious or convulsing person. Get medical attention.

If in eyes: Flush eyes with plenty of water.

If on skin: In case of contact, remove contaminated clothing and wash affected area with soap and water.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote only by injection.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

DIRECTIONS FOR USE

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 or disposal.

Storage: Store product in its original labeled container in a cool, dry, locked place out of reach of children.

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: 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.

Household: Do not reuse empty container. Wrap container and put in trash.

*COMMERCIAL CONTROL

The following paragraphs correspond to insects followed by asterisk (*) on the above front panel. Insects not followed by an Asterisk (*) may be controlled by following the instruction FOR USE ON GOLF COURSES, ETC. Repeat as needed for control.

TICKS AND FLEAS

Use 2.4 lb per 1,000 sq ft for area control of these insects, infesting non-crop-land areas such as golf courses (turf only), road medians and industrial sites where these pests are present and are creating a nuisance. DO NOT allow use of treated area during applications.

CHINCH BUGS

Apply 2.4 lb per 1,000 sq ft when insects appear or their damage is imminent. To prevent damage, apply as soon as daily temperatures reach 80 degrees and repeat every 2 months. For best results, product should be watered in after application.

SOD WEBWORM

For SOD WEBWORMS, delay watering or mowing the treated area for 12 to 24 hours after treatment. Treat in the spring or when insects first appear troublesome. Additional treatments at 30-day intervals may be needed for new infestations. Apply at rate of 2.4 lb per 1,000 sq ft.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

DEC 18 2000

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

10404-81

#000007 (Front)

LESCO® Granular Dursban® Insecticide

4/4

IMPORTED FIRE ANT CONTROL - MOUND TREATMENT

To control Fire Ants in lawns, turf and premise areas, apply 1/2 cup (4 ounces) evenly over and around each mound. For best results, do not disturb the mound before or during the application. Apply in cool weather (65° - 80°F) or in the early morning or later evening. Treat new mounds as they appear.

FOR USE ON LAWNS, PARKS, GOLF COURSES, ROAD MEDIANS AND INDUSTRIAL SITE TURF AREAS: Apply uniformly to golf courses, road medians and industrial site turf and non-cropland areas using any hand or power operated gravity or rotary type spreader designed for application of granules.

SURFACE INSECTS

For Surface Insects: Ants, Armyworms (Beet, Fall, Yellowstriped), Ticks, Centipedes, Cutworms, Crickets, Earwigs, Fiery Skipper, Grasshoppers, Leafhoppers, Millipedes, Clover Mites, Sowbugs, and Springtails, use 2.4 lb per 1,000 sq ft (105 lb per acre). Treat when insects first appear. Sprinkle the granules lightly to wash granules off grass blades just to soil surface. Observe delayed watering for Sod Webworm Control.

WARRANTY

LESCO warrants that this insecticide conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this insecticide 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.

APPROXIMATE ROTARY SPREADER SETTINGS:

Model:	# Product /1,000 sq ft	#A/A	Approx* Setting
LESCO (Calibration Gauge)	2.4	1.0	# 11
Cyclone or Spyker	2.4	1.0	3.00
Ortho	2.4	1.0	3.50
True Temper Commercial 5000	2.4	1.0	4.25
True Temper SB 1500	2.4	1.0	3.25

***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.

INSECT CONTROL USING BAND AND PERIMETER TREATMENT
Use for crawling insect control outside of warehouses, food handling establishments, commercial and industrial sites.

To protect against insects entering the indoors, a band of granules may be placed around the outside of buildings to kill Ants, Brown Dog Ticks, Crickets, Earwigs, Fleas, Millipedes, Sowbugs, Springtails, and Spiders before they attempt to enter. Use 2.4 lb to treat 1,000 sq ft (as a band 5 ft. x 200 feet long) around the structure. Apply when insects have become troublesome or before they cause problems in the spring or early fall. Repeat one month later and then as needed for control but not more than once every 7 days.

LESCO is a registered trademark of LESCO, Inc.
 Dursban is a registered trademark of DowElanco.
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Net Weight: 40 lb (18.1 kg)

#000007

Manufactured by: LESCO, Inc.
 20005 Lake Road
 Rocky River, Ohio 44116-1545

