

28293-203

1-30-2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Lee Tharrington
Registration Specialist
Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 33762

JAN 30 2001

Subject: Chlorpyrifos MOU dated June 7, 2000
Unicorn Dursban 1-D Insecticide
EPA Reg No.: 28293-203
Submission Dated: 12/14/00

Dear Mr. Tharrington:

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. If the conditions enumerated above are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e).

- 1). The Agency acknowledges the change in container size to 25 pounds as indicated on EPA form 8570-1 dated 12/14/00.
- 2). Please note that for fire ant control the Agency has decided that the text "for use only in Public Health Control Programs by State, Local or other Public Health Agencies and their contractors" must be replaced with "For professional use only." This text must appear on the front panel of the label and also on Page 3 of the label.
- 3). Because this product must be applied by some kind of equipment, you must remove the text "ready to use" on Page 2 of the draft label.

- 4). The text "this product is an insecticidal dust ... apply directly into cracks and crevices or other localized areas with a bulbous duster or other suitable equipment" should be placed under the section entitled "Application within non-food areas of industrial and manufacturing plants" or deleted since it clearly does not apply to the fire ant use directions.
- 5). You must clarify whether the instructions on Page 2 "the amount of dust to be applied will vary, but should be in the range of 1/3 to 2/3 ounces per square yard" also pertain to the indoor use in industrial and manufacturing plants.
- 6). We strongly recommend that you provide directions for transferring the product to the application equipment, with special emphasis on minimizing handler exposure.
- 7). We also strongly recommend that you add personal protective equipment (PPE) text to your label. The text should be based on the toxicity of your product and should, at the least, state something like:

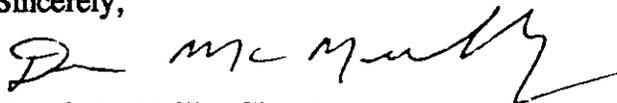
Applicator and other handlers should wear:

- Long sleeved shirt and long pants,
 - Chemical gloves made of any waterproof material, and
 - Sock plus shoes.
- (-Respiratory protection, if appropriate, may also be recommended.)

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

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UNICORN DURSBAN^(R) 1-D INSECTICIDE

- For Use in Manufacturing Plants
- For Control of the Imported Fire Ant

ACTIVE INGREDIENT:

Chlorpyrifos (O,O-diethyl-O-(3,5,6-trichloro-2-pyridyl) phosphorothioate. 1.0%

INERT INGREDIENTS: 99.0%

Total: 100.0%

Dursban^(R) is a Registered Trademark of DowElanco

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side/Back Panel for Additional Precautionary Statements

NET WEIGHT: 25 LBS.

MANUFACTURED BY:

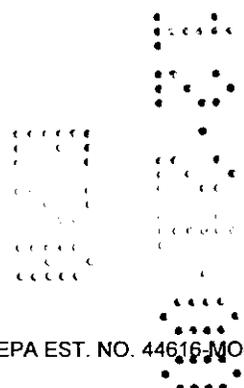
UNICORN LABORATORIES
12385 AUTOMOBILE BLVD.
Clearwater, Florida 33762

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 30 2001

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

~~28293-203~~



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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Wash contaminated clothing before reuse. Avoid breathing dust. May be harmful if swallowed. Do not allow dust to contact food, feedstuffs, and water supplies. Do not use in poultry houses or other animal buildings.

First Aid

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush eyes with plenty of water for 5 minutes. Get medical attention if irritation persists.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

Environmental Hazards

This product is highly toxic to bees exposed to direct treatment or residues on plants. Protective information may be obtained from your Cooperative Agricultural Extension Service.

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.

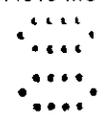
DIRECTIONS FOR USE

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

This product is a ready-to-use insecticidal dust which controls pests as indicated below.

Apply directly into cracks and crevices or other localized areas with a bulbous duster or other suitable equipment. The amount of dust to be applied will vary, but should usually be in the range of 1/3 to 2/3 ounces per square yard.

Application within non- food areas of industrial and manufacturing plants: For spot treatment only -- Apply as a light but uniform dust to localized areas where cockroaches, (including strains resistant to certain other insecticides), ants, clover mites, crickets, firebrats, silverfish and spiders are found or normally occur. For ants - apply to ant trails and wherever else these pests may find entrance.



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OUTDOOR USE

IMPORTED FIRE ANT MOUND TREATMENT: For use only in Public Health Control Programs by State, Local or other Public Health Agencies and their contractors.

Evenly dust two tablespoons (approximately 1 oz.) of Unicorn Dursban 1-D Insecticide over the top of each mound. Do not water in or disturb the mound. Apply when temperatures are between 65° and 80°F. Allow 3 to 4 days for maximum control, then repeat as necessary.

STORAGE AND DISPOSAL

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

STORAGE: Store in cool, dry area.

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

NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

This container is filled by weight, not by volume. You can be assured of the proper weight even though some settling of contents normally occurs during transportation and handling.

