

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (Second)

WASHINGTON, D.C. 20480

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

DEC 1 8 2000

to water, or to arose whose spring control to pro-

Janet P. Baguhn
Howard Johnson's Enterprises, Inc.
Compliance Manger
700 W. Virginia St.
No. 222
Milwaukee, WI 53204

Subject: Chlorpyrifos 2.32% EUP

Dursban 2.32 G Insecticide EPA Reg. No. 32802-22 Submission date: 8/30/00

Dear Ms. Baguhn,

The label referred 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) There is a typo in the "Precautionary Statements" section which must be corrected to read:

"Do not breathe dust."

- 2) In the "Precautionary Statements" section the following sentence must be revised to read:
- "When watering-in is directed keep the public (especially children and pets) off treated areas until the insecticide has been watered into the soil and the grass is dry."

This same sentence appears under and must be corrected in the "Root Feeding Insects" section and the "European Crane Fly Larvae (Leather Jackets) section".

3) The "Environmental Hazards" statement currently on the label must be replaced with the following chlorpyrifos specific non-aquatic use site environmental hazards statement:

"This pesticide is toxic to birds, fish, and aquatic invertebrates. Birds feeding in treated areas may be killed. Clean up spilled product to reduce exposure to 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 when cleaning equipment or disposing of equipment washwaters."

4) In the "Root Feeding Insects" section, the following phase must be removed:

"(by lawn care applicator or customer)".

5) Under the header "Directions for Use", the word "turf" must be added to the description of the application site and the modified sentence must read as follows:

"For use on golf course turf."

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).

If you have questions regarding this label review, please contact Marianne Lewis at (703) 308-8043 or electronically at Lewis.Marianne@EPA.gov.

Sincerely,

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

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DURSBAN* 2.32 G INSECTICIDE

GOLF COURSE TURF INSECT CONTROL

ACTIVE INGREDIENT:

Chlorpyrifos: [O,O-Diethyl O-(3,5,6-trichloro-2-

EPA Reg. No. 32802-22

EPA Est. No. 32802-WI-1 (A), 32802-MO-1 (B)

Fig* letter of bag code shows establishment where manufactured. actured by

HOWARD JOHNSON'S ENTERPRISES, INC. 700 W. Virginia Street, Milwaukee, WI 53204-1548

NET WEIGHT: 25 lb (or 36, 40 or 50 lb)

*DURSBAN is a Reg. Trademark of DowElanco

KEEP OUT OF REACH OF CHILDREN

CAUTION: See (back or side) panel for additional precautionary statements and first aid information

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

AUTION: May be harmful if swallowed. Do not take internally. Don not breathe dust. Avoid contact with eyes, skin, or clothing. Wash contaminated clothing before reuse. Wash thoroughly after handling and before eating or smoking. When watering-in is directed keep children and pets off treated areas until grass is dry. Do not contaminate feed or foodstuff.

FIRST AID

IF SWALLOWED: Call a physician or poison control center immediately. Induce vomiting by giving person 1 or 2 glasses of water and touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

IF INHALED: Remove person to fresh air. Apply artificial respiration

if indicated. Get medical attention immediately.

IF ON SKIN: Remove contaminated clothing and wash affected

area with soap and water. Wash clothing before reuse.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists. Note to Physician: Chlorpyrifos is a Treat symptomatically. Atropine, by cholinesterase inhibitor.

injection only, is an antidote.

ENVIRONMENTAL HAZARDS: Do not contaminate water when disposing of equipment washwaters. This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not apply where runoff is likely to occur. Use only as Directed.

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on golf courses.

GOLF COURSE TURF INSECT CONTROL

ACCEPTED

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surface insects.

ROOT FEEDING INSECTS: For the control of White Grub larvae of Black Turfgrass Ataenius, Japanese Beetle, European Chafer, Southern Masked Chafer and Hyperodes Weevil apply at the rate of 1 pounds per 1000 square feet of turf. Refer to Spreader Settings chart for suggested spreader settings. Make sure your spreader is calibrated for this product before application. Apply when insects are young and actively feeding near the soil surface in mid-July and early August or when local conditions indicate a soil feeding insect problem. Consult your local Extension Service for when to treat in your area. For soil insects irrigate the turf (by lawn care applicator or customer)

with 1/4 to 1/2 inch of moisture after treatment to place the insecticide into the root zone where the insects are feeding. Do not allow children or pets on treated area until insecticide has been watered into the soil and the grass is dry.

EUROPEAN CRANE FLY LARVAE (LEATHER JACKETS): For specific control of the Crane Fly Larvae apply 1 pounds of this product to 1000 square feet of turf. Refer to Spreader Settings chart for suggested spreader settings. Make sure your spreader is calibrated for this product before application. The larvae will also be controlled simultaneously with an application for surface or root feeding insects. Consult your local Extension Service for when to treat in your area. Irrigate the turf (by lawn care applicator or customer) with 1/4 to 1/2 inch of moisture after treatment to place the insecticide into the root zone where the insects are feeding. Do not allow children or pets on treated area until insecticide has been watered into the soil and the grass is dry.

DEER TICK CONTROL: For control of Deer Ticks, Rocky Mountain Wood Ticks (Bear Tick), Black Legged Tick (Ixodes spp.) and Lone Star Tick (Ambiyomma spp.) which can transmit Lyme Disease apply 1 pound per 1000 square feet of turf. The species of ticks responsible for transmitting Lyme Disease is the Northern Deer Tick (Ixodes dammini) in the eastern United States and to a lesser extent, the Black Legged Tick (Ixodes pacificus) in the western United States. Northern Deer Tick is the species most commonly associated with transmitting Lyme Disease. It is a very small multiple host species with a two year life cycle. Eggs are deposited in the spring by over-wintered adults. The larval ticks hatch and wait underneath leaf litter until a small host, such as a bird or mouse, is available. Having obtained a blood meal from this host, the larvae over-winter and develop into nymphs the following spring. Nymphs, which are controlled with a May/June application, rest in leaf litter or vegetation and attach to any host, such as a dog, deer, mouse, or human. After a blood meal, nymphs leave the host and molt into adults. Adults then mate and deposit eggs in the leaf litter. Adult ticks prefer to stay on small vegetation matter, better enabling them to attach to a host.

Both nymphs and adults can transmit the disease pathogen for Lyme Disease (spirochete bacterium) if the disease was obtained from the host during the first blood meal as a larvae. Symptoms of the disease do not appear in carrier hosts such as mice, deer or other wildlife animals. Research shows that from 25 to 50 percent of a deer tick population may carry the pathogens -

For control of Deer Ticks, Rocky Mountain Wood Ticks (Bear Tick), Black Legged Tick (Ixodes spp.) and Lone Star Tick (Amblyomma spp.) which transmit Lyme Disease apply to golf courses, at the rate of 1 pounds per 1000 square feet. Begin application in the later spring or early summer (May or June). Continue at 3 to 4 week intervals during the tick season, as ticks may be reintroduced from surrounding areas by domestic animals and wildlife. Treat entire turf area where exposure to ticks may occur.

SPREADER SETTINGS to apply at the listed pounds per 1000 square feet 1.0lbs

Spreader A Spreader B

Spreader C

Spreader D

(This chart may contain additional spreader brands/models, spreader settings, and instructions for spreader use and calibration, as appropriate for the product)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. STORAGE: Store in original container in a cool, dry, place out of reach of children.

<u>PESTICIDE DISPOSAL</u>: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal

(<u>TAINER DISPOSAL</u>: 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.