MAY 27 1993

Mr. J. Allen Dunlap III Platte Chemical Company P.O. Box 667 Greeley, Colorado 80632

Subject: Revised Labeling--Avian Exposure

Clean Crop Turcam 2.5G Insecticide EPA Registration Number 34704-437 Your Application Dated April 9, 1993

Dear Mr. Dunlap:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable provided that you make the labeling change indicated below before you release the product for shipment bearing the amended labeling:

In the Environmental Hazards section, delete the sentence, "Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes." Substitute the sentence, "For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark."

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

DHE

Dennis H. Edwards, Jr. Product Manager (19) Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosure

RESTRICTED USE PESTICIDE

Due to Aquatic and Avian Toxicity

For retail sale to, and use only by, Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.





TURCAM® 2.5 INSECTICIDE

** **

FOR USE ON ORNAMENTAL TREES, SHRUBS AND TURF **ACTIVE INGREDIENT:** By Weight Bendiocarb: (2,2-dimethyl-1,3 benzodloxol-4-yl methylcarbamate*) 2.5% INERT INGREDIENTS 97.5% TOTAL 100,0%

*Protected by U.S. Patent No. 3,736,338

granules spilled on soil surface. 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.

IMPORTANT: Read the entire Directions for Use and Disclaimer of Warranties before using this product.

mole crickets. Do not apply directly to water or wetlands (swamps, boos.

marshes, and potholes). Runoff from treated areas may be hazardous to

aquatic organisms in neighboring areas. Do not contaminate water by

cleaning of equipment or disposal of waste. Collect, corporate

DIRECTIONS FOR USE

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

KEEP OUT OF REACH OF CHILDREN CAUTION

DO NOT USE ON FOOD CROPS

SEE BELOW FOR ADDITIONAL PRECAUTIONARY INFORMATION

> EPA REG. NO. 34704-437 EPA EST. NO. ___

NET WEIGHT **POUNDS**

 TURGAM is a Registered T.M. of NGR-AM CHEMICAL COMPANY. 34971 EXPO3Y93

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Do not take internally. Do not breathe dust. Avoid contact with skin, eyes, or clothing. May be absorbed through the skin. Wear long sleeves. Change clothing delily. Wash hands thoroughly after handling. Keep children and pets off treated area during irrigation and until area has dried. Avoid contamination of feed and foodstuffs.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, Call physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

IF INHALED: Remove victim to fresh air.

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

IF IN EYES: Flush with plenty of water. Get medical attention if irritation

NOTE TO PHYSICIAN: Bendiocarb is a moderate, reversible cholinesterase inhibitor. Intravenous injection of atropine is antidotal.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Birds, especially waterlowl, feeding or drinking on treated areas may be killed. Avoid overlapping granules. Avoid applications to bare soil or thin grassy areas where product may be more readily consumed by birds feeding on areas of exposed soil. Also avoid applications in ecologically sensitive areas (e.g., adjacent to wetlands or wildlife preserves) or to areas where birds are known to feed (i.e., near bird feeders or near ponds where waterlow! graze or feed). Subsurface application is recommended for grubs and STORAGE AND DISPOSAL

Do not contaminate water, feed, or food by storage or disposal. Store this product in its original, closed container in a dry, locked area away from children and domestic animals. Do not reuse empty container. 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: Compistely 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.

GENERAL INFORMATION: TURCAM 2.5 G is a broad spectrum residual insecticide for the control of certain insects on ornamental trees. shruhs, and turf.

Do not apply more than 240 lbs. of TURCAM 2.5G per acre per year. Spring applications must not exceed 120 lbs. of TURCAM 2.5G per acre. trrigation prior to application in dry conditions may improve product performance.

Use on established turf; do not apply to thin turf with exposed soil. ENDANGERED SPECIES RESTRICTIONS: The use of any positions in a manner that may kill or otherwise harm an endangered or threat species or adversely modify their habitat is a violation of federal laws. The use of this product on golf courses and sod farms in San e County, California and on the Islands of Hawaii and Mauli is prohibited.

ORNAMENTAL TURF, ORNAMENTAL TREES AND SHRUBS RECOM-MENDATIONS: Use TURCAM 2.5 G to control specified pells of dis-mental turf and of the following nonedible ornamental trees and shrubs: Ables, Acer, Arborvitae, Azalesi, Barberry, Birch, Boxwood, Brassair, Camellia, Cedar, Cephalotuxus, Cercis, Cherry, Cornus, Ontoneasur, Crateegus, Crape Myrtle, Euonymus, Fatsia, Ficus, Fountifif grafts, Flowering almond, Flowering crabapple, Gardenia, Hemiock, Hydrangea, Nex, Ixora, Japanese yew, Juniper, Ligustrum, Lilac, Loguet, Maho-nia, Mimosa, Mock Orange, Nandina, Oleander, Pachysandra, Mhotinia, Pices, Pieris, Pine, Poinsettia, Pomegranate, Poplar, Prufice Spp., Pseudotsuga, Pyracantha, Pyrus, Rhododendron, Rose, Sage pal Schefflera, Spirea, Sycamore, Taxus, Thuja, Tsuga, Viburnum, Williams,

APPLICATION PROCEDURES

Apply TURCAM 2.5 G to give complete and uniform coverage of the pestited areas. Applications should be made using the rates below. For control of white grube, apply when peets become evident. Control of grubs is best when they are still small; therefore late summer applications are preferable to apring. Irrigate as soon as possible, preferably within six hours after completing applications, with 1/4-3/4 inches of wat to encourage movement of TURCAM 2.5 G into soil and to reduce chances of contact with non-target organisms.

For surface-feeding and surface-dwelling insects, apply when peets are

TURCAM® 2.5 G

EPA REG. NO. 34704-437

evident. Use adequate quantity of water to moisten grass and thatch after application.

Apply TURCAM 2.5 G to give complete and uniform coverage of the peatinfested areas. Applications should be made using the rates shown below:

SURFACE APPLICATION

| Pest | Dosage of Product | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|--|
| | Lb/Acre | Lb/1,000 sq. ft. | |
| White grubs of: Japanese beetle, Black turf grass Atsenius, European chaler, Northern masked chaler, Southern masked chaler, Green June beetle, Annual white grub (Cyclocephala immaculata). Mole crickets | 80 to 120 | 1.9 to 2.8 | |
| Surface dwellers and/or feeders: Chinchbugs, Leafhoppers, Sod webworms, Anis, Brown dog ticks, Centipedes, Crickets, Earwigs, Firebrats, Fleas, Ground beetles, Millipedes, Pillbugs, Scurpions, Silverfish, Sowbugs, Spiders. | 40 to 80 | 0.9 to 1.9 | |

SUBSURFACE APPLICATION

| Pest | Dosage of Product | | |
|-------------------------------------------------------------------|-------------------|----------------|--|
| | Lb. Acre | Lb/1,000 sq. * | |
| White grubs of: Japanese beetles, Southern masked chafer | 80 to 120 | 1.9 to 2.8 | |
| Mole crickets | 50 to 80 | 1.1 to 1.8 | |

Allow 14 days between applications of TURCAM 2.5G.

LANDSCAPE PLANT RECOMMENDATIONS: Use TURCAM 2.5 G to control specified posts of nonedible ornamental landscape plants including, but not limited to: Ageratum, Azarina, Begonia, Calendula, Celosia, Chrysanthemum, Coleus, Daffodil, Dahlia, Dianthus, Ferns, Fuchsia, Gazania, Geranium, Holly, Hypoestes, Impatiens, Iris, Ivy, Kalandra, Lily of the Valley, Marigold, Nasturtium, Nicotiana, Pansy, Petunia, Portulaca, Salvia, Shasta daisy, Snapdragon, Verbena, Vinca, and Zinnia

Apply TURCAM 2.5 G to give complete and uniform coverage of the pest-infested a.e.s. Applications should be made using the rates in the above table applied below or around the landscaped area.

PERIMETER TREA. MENT: To help prevent intestation of buildings by ants, crickets, brown dog ticks, centipedes, earwins, firebrats, fises, ground beetles, millipedes, pillbugs, scorplons, silverlish, sowbugs, and spiders, treat a band of soil 6 to 10 feet wide around and adjacent to the building at a rate of 0.9 to 1.9 lbs. per 1000 square feet.

CARPENTER ANTS: For control of Carpenter ants around firewood piles. Treat the area where firewood is to be stacked at the rate of 0.9 to 1.8 lbs. per 1000 square feet. After the firewood is in place, treat a 3 to 6 foot band around the woodpile. If the rows of wood are stacked so there is about 2" between them, repeated treatment of the woodpile can be made by sprinkling or shaking the granules between the rows.

PLANT SAFETY

TURCAM 2.5 G had demonstrated excellent plant safety; however, all species and varieties have not been tested. When treating large numbers of plants of a single variety, reat a few plants and observe prior to full scale application.

APPLICATION EQUIPMENT: TUTICAM 2.5 G is a granular formulation. Application using subsurface placement equipment is recommended for insects below the soil surface. When it this is not practical, apply with a fertilizer spreader or equivalent equipment as uniformly as possible. For white grubs of Japanese bestle and Southern masked challer, apply TURCAM 2.5 G 0.25-0.75 inch deep in 3-inch bends. For mote criciets, apply TURCAM 2.5 G 0.75-1.00 inch deep in 3-inch bends or tess. The following table lists application equipment and recommended senings for that equipment for the surface application of TURCAM 2.5 G.

Calibration of Spreaders for Applications of TURCAM 2.5 G Approximate Spreader Settings to Apply Founds of TURCAM

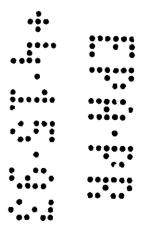
| Model | Product per Acre 80 | Once Over | Twice Over | Sweth Width |
|-------------------------------|---------------------------|--------------|---------------|----------------|
| | | | | |
| SPYKER | 5 U | | | |
| | | 3.9 | 3.4 | 6 ft. |
| (Rotery) | | | | |
| LESCO | 80 | D1/2 | _ | 8 ft. |
| (Rotary) | | | | |
| CYCLONE | 40 80 | 3.25 | _ | _ |
| (B-1, 3 0, 96) | .80 | 4.00 | _ | _ |
| | 160 | 5.00 | | |
| PRIZE- | | 4.5 | _ | Same as |
| LAWN- | 120 | 5.0 | _ | spreader |
| CBR | | | | _ width |
| GANDY | 80 | 30 | _ | 30 inches |
| DROP | 120 | 34 | _ | 30 inches |
| SCOTT | 80 | 63/4 | | 21 inches |
| DROP | 120 | 8 | - | 21 inches |
| SCOTT R-7x | 80 | F-1/2 | | 9 ft. |
| | 120 | H-1/2 | | 9 ft. |
| SCOTT RIBA | 80 | L | | 10 ft. |
| | 120 | M-1/2 | _ | 10 ft. |
| VICON or | 80 | 18 | | 15 ft. at 5 |
| LESCO | | | | mph |
| Pendulum | | | | • |
| LELY HR | 120 | 4 | | 23 ft. |
| spreader | | (right | | with a PTO |
| asembly | d | discharge | | speed of |
| setting #3 | - | | | 510 |
| | _ | opening | | and RPM |
| | · | 44.) | | 1700 |
| | | , | | at 5 mph |

IMPORTANT: Please note that these settings are approximate as the condition of each piece of equipment can affect actual rates of application. Settings should be made after a calibration check is completed.

NOTICE

PLATTE WARRANTS THAT THIS PRODUCT CONFORMS TO THE CHEMICAL DESCRIPTION ON THE LABEL THEREOF AND IS REASONABLY FIT FOR THE PURPOSES STATED ON SUCH LABEL ONLY WHEN USED IN ACCORDANCE WITH THE DIRECTIONS UNDER NORMAL USE CONDITIONS. IT IS IMPOSSIBLE TO ELIMINATE ALL RISKS INHERENTLY ASSOCIATED WITH THE USE OF THIS PROCYCT. CROP INJURY, INEFFECTIVENESS, OR OTHER UNINTENDED CONSEQUENCES MAY RESULT BECAUSE OF SUCH FACTORS AS WEATHER CONDITIONS, PRESENCE OF OTHER MATERIALS, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF PLATTE. IN NO CASE SHALL PLATTE BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER.

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