

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Enforcer Products c/o Ms. Kim Davis RegWest Company 30856 Rocky Road Greeley, CO 80631-9375

DEC - 6 2001

Dear Ms. Davis:

Subject: Amendment - Comply with 2000 Diazinon MOA;

Delete Celery and Pole Beans;

Update First Aid per PR Notice 2001-1; and

Update CSF/replacement diazinon source

Enforcer Ant Kill Granules II EPA Registration Number 40849-30

Your submissions dated June 20 and 21, 2001

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

- 1. Submit and/or cite all data or other material 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 front panel use limitation slightly so that it reads "For outdoor use on the home lawn and the home garden only".
 - b. Revise the end of the front panel claims so that it reads "...and Other Insects as listed in Directions For Use.".
 - c. Under the heading DIRECTIONS FOR USE, slightly revise the reformulation prohibition to read "Reformulation or repackaging of this product is prohibited.".
 - d. Under the heading Overall Lawn Application, the heading Special Precautions to Reduce Risks to Birds and its associated text should appear within an outline box.
 - e. Under the heading Fire Ants, add the word "home" before "lawns" in the first sentence.

- f. Under the heading BAND TREATMENT AROUND HOUSE FOUNDATION, revise "(5' by 20')" to read "(2' by 50')", since band width is limited to 2 feet.
- g. Under the heading VEGETABLE INSECT CONTROL, the heading Special Precautions to Reduce Risks to Birds and its associated text should appear within an outline box.
- h. Under the heading VEGETABLES INSECT CONTROL, revise "Do not apply this product to food crops grown in greenhouses." to read "Do not apply this product in greenhouses.".
- i. For the crop Sweet Potatoes, delete the pest Flea Beetles. This foliar pest will not be controlled by an at-plant application of a granular formulation.
- 3. Submit three (3) copies of your final printed labeling before you release the product for shipment.
- 4. Comply with all applicable provisions of the 2000 Memorandum of Agreement Regarding Pesticide Products Containing Diazinon (i.e., the Diazinon MOA). In accordance with the Diazinon MOA you have requested the following revisions to the conditions of registration for this diazinon product with outdoor non-agricultural (i.e., home and garden) uses:
 - a. You have requested under section 6(f) of FIFRA that this registration be voluntarily canceled on a date not later than December 31, 2004.
- b. You may not manufacture, label, or release for shipment this product after June 30, 2003.
- c. You may not sell or distribute this product after August 31, 2003.
- d. The registration for this product shall expire and be canceled on December 31, 2004.
- e. You will send to every person who directly purchases this product (i.e., to every seller) a notification of Product Recovery Program to be conducted by Syngenta and Makhteshim after December 31, 2004.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

The Basic Confidential Statement of Formula (CSF) dated June 20, 2001 which identifies a replacement diazinon source Manufacturing Use Product is acceptable and has been added to this product's registration file.

Sincerely,

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

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06/20/01

ENFORCER® ANT KILL GRANULES II

Treats up to 500 Sq. Ft.

For Outdoor Use on the Home Lawn and in the Home Garden Only This Product Must Not be Used on Golf Courses and Sod Farms

> Contains 5% Diazinon [Insecticide] Ready-to-Use Granules

ACCEPTED with COMMENTS In EPA Letter Dated:

DEC - 6 2001 Under the Federal Insecticide.

Fungicide, and Rodenticide Act.

Kills: Ants, Armyworms,
Bermudagrass Mites, Billbugs, Brown Dog Ticks,
Chiggers, Chinch Bugs, Crickets, Cutworms,
Earwigs, Fire Ants*, Fleas,
Onion Maggots, Root Maggots, Sod Webworms,

as amended, for the pesticide registered under ED ace. No. 10849-30

Onion Maggots, Root Maggots, Sod Webworms,
White Grubs (of European Chafer, Japanese Beetle and Southern Chafer),
Wireworms and Other Insects
*Aids in control

Active Ingredient:

Diazinon: 0,0-Diethyl 0-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate 5%

Other Ingredients 95%

Total 100%

Keep Out of Reach of Children CAUTION

See back panel for additional precautionary statements.

Net Weight: 1 lb. (16 oz. / 454 g)

{Back Panel}

Enforcer® Ant Kill Granules II

In lawns Ant Kill Granules II kills: Ants, Armyworms, Bermudagrass mites, Billbugs, Brown dog ticks, Chiggers, Chinch bugs, Clover mites, Crickets, Cutworms, Digger wasps, Earwigs, Fire ants*, Fleas, Lawn moths, Leafhoppers, Millipedes, Sod webworms, Sowbugs (Pillbugs), Springtails and White grubs of European chafer, Japanese beetle and Southern chafer. *Aids in control.

In gardens Ant Kill Granules II kills: Cutworms, Mole crickets, Onion maggots, Root maggots and Wireworms.

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Directions for Use and Conditions of Sale and Warranty

Important: Read the entire *Directions for Use* and the *Conditions of Sale and Warranty* before using this product. If terms are not acceptable, return the unopened product container at once.

Conditions of Sale and Warranty

The *Directions for Use* of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. 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 Enforcer products or the Seller. All such risks shall be assumed by the Buyer.

Enforcer Products warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the *Directions for Use* subject to the inherent risks referred to above. Enforcer Products makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall Enforcer Products or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. Enforcer Products and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing *Conditions of Sale and Warranty*, which may be varied only by agreement in writing signed by a duly authorized representative of Enforcer Products.

DIRECTIONS FOR USE

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

Reformulation or repackaging this product is prohibited.

Overall Lawn Application Special Precautions to Reduce Risk to Birds

Birds, especially waterfowl (ducks or geese), feeding or drinking 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, NY between 11/1 and 5/20; 3) Do not exceed maximum permitted label rates, since 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 to sites within 75 feet of any body of water, such as lakes or ponds, that may attract waterfowl; 7) If it is necessary to repeat application, wait a minimum of 3 weeks between applications. Make no more than 4 applications per year.

Ant Kill Granules II controls certain lawn insects on both grass and dichondra lawns. Apply Ant Kill Granules II with a fertilizer spreader. Refer to the tables that follow for use rates and spreader settings.

Pest	Rate*	Timing/Special Directions
Ants, Armyworms, Bermudagrass mites, Brown dog ticks, Chiggers, Chinch bugs, Clover mites, Crickets, Cutworms, Earwigs, Fleas, Lawn moths (sod webworms), Leafhoppers, Millipedes, Sowbugs (Pillbugs), Springtails (Collembola)	2 lbs. per 1000 sq. ft.	Apply when grass is dry. Water lawn lightly after application. If necessary, repeat application at 3-week intervals. Make no more than 4 applications per year.
Billbugs, White grubs of European chafer, Japanese beetle, Southern chafer, Ataenius spretulus (dung beetle)	2 lbs. per 1000 sq. ft.	Water grass with at least ¼ inch of water after application, however, stop watering before puddling occurs. For billbug control, apply when activity is first observed or when chewed grass indicates damage. If necessary, repeat application at 3-week intervals. Make no more than 4 applications per year. For grub control, except dung beetle, treat any time between late July and early October. For dung beetle grub control, apply in spring or summer when damage is first noticed. Water grass with at least ¼ inch of water after application, however, stop watering before puddling occurs. Treat again in late summer or early fall, if a second generation occurs.
Hyperodes weevils	2 lbs. per 1000 sq. ft.	Water grass with at least ¼ inch of water after application, however, stop watering before puddling occurs. Treat problem areas in mid-April and again in mid-May.

*1000 sq. ft. = an area 20 ft. x 50 ft.

100 sq. ft. = an area 10 ft. x 10 ft.

2 lbs. per 1000 sq. ft. = 3.2 oz. per 100 sq. ft.

Note: The spreader settings listed below are approximate. Accurately weigh a few pounds into your spreader and apply to a measured area. Then adjust the spreader setting, if necessary, in order to assure correct rate of application.

Lawn Spreader Setting Number**

(To deliver 2 lbs. per 1000 sq. ft.)

Spreader Make and Model	Setting
Central Imperial Mark No. 1662-G	61/2
Central Suburbia lawn Spreader No. 1662-0	61/2
Cyclone Model B1 Rotary	41/2
Greenfield Model 105	61/2
ORTHO Drop Spreader Model 3000	41/2
ORTHO Broadcast Spreader Model 4000	41/2
J.C. Penney Model 6005	71/4
J.C. Penney Rotary Spreader	5
Scott Precision Flow Spreader Model PF-4	4
Sears Craftsman Model 671.19198	6

^{**}For application with other types of equipment apply at the rate of 2 lbs. per 1000 sq. ft.

Lawn Spot Treatment

Ants: Apply 11/2 teaspoons of Ant Kill Granules II over and around each ant hill.

Tire Ants: To aid in the control of fire ants in lawns and other outdoor home recreation areas, apply ½ cup over, and 2 feet around, each fire ant mound. Immediately after application, water-in thoroughly. Apply gently to avoid disturbing ants. Use of high pressure watering equipment may disturb the ants and cause migration, reducing product effectiveness. A minimum of 1 gallon of water should be applied to each mound area. Reapply as necessary. **Note:** For best results, apply in cool weather, 65-80°F, or in early morning or late evening hours. Works within 24 hours. No waiting for days or weeks. Treat new mounds as they appear.

Digger Wasps: Apply 1½ teaspoons of Ant Kill Granules II in and around each nest opening. Apply at dusk when wasps are not active.

Band Treatment Around House Foundation

The following pests are commonly found around or near foundations and may enter the house: Ants, Brown dog ticks, Clover mites, Crickets, Earwigs, Fleas, Millipedes, Sowbugs (Pillbugs) and Springtails (*Collembola*). Apply a 2-foot band of Enforcer® Ant Kill Granules II next to the house foundation. Distribute granules uniformly, using a rate of 3.2 oz. for each 100 sq. ft. of area (5' x 20') treated. If necessary, repeat application at 3 week intervals.

Vegetables – Insect Control Special Precautions to Reduce Risk to Birds

Birds feeding on treated areas may be killed. To reduce risk to birds: 1) Thoroughly mix Ant Kill Granules II into the soil ruring or immediately after application. Refer to the **Soil Incorporation** table that follows; 2) Granules that are spilled or are visible on soil surfaces should be covered with soil or thoroughly mixed into the soil.

Ant Kill Granules II controls certain garden insects on crops listed in the following table. Apply uniformly as directed for each crop. When a range of rates is given, use the higher rate only for heavier infestations. Do not apply this product to food crops grown in greenhouses. Applications for control of pests listed below should be thoroughly mixed into the soil during or immediately after application.

Soil Incorporation

Insect	Depth of Mixing or Incorporation into Soil
Surface cutworms*	2-3 inches
Subterranean cutworms*	3-6 inches
Mole crickets	1-2 inches
Root maggots	3-4 inches
Wireworms	4-8 inches

^{*}If type of cutworm cannot be identified, mix into soil 4-6 inches deep.

Crop	Pest	Rate/500 Sq. Ft.	Timing/Special Directions	
Beans: Lima and Snap	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.	
(succulent only)	Wireworms	10½ -14 oz.	1	
	Note: Do not use on dried bean varieties, such as pintos, dried limas or navy beans.			
Beets, Red (Table)	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.	
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.	
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.	

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Crop	Pest	Rate/500 Sq. Ft.	Timing/Special Directions
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Broccoli	Root Maggots	7-10½ oz.	Broadcast and mix into soil just before planting or transplanting.
	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Brussels Sprouts	Root Maggots	7-10½ oz.	Broadcast and mix into soil just before planting or
, i			transplanting.
	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Cabbage	Root Maggots	7-10½ oz.	Broadcast and mix into soil just before planting or transplanting.
	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Carrots	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Cauliflower	Root Maggots	7-10½ oz.	Broadcast and mix into soil just before planting or transplanting.
	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Collards	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Cucumbers	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Wireworms	10½-14 oz.	1 ' j
Endive (Escarole)	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Kale	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Lettuce	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Melons (Cantaloupes,	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
Casabas, Crenshaws, Honeydew, Muskmelons, Persians and Hybrids of these) and Watermelons	Wireworms	10½-1 4 oz.	
Mustard	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
Onions (Bulb and Green)	Onion Maggots	7-14 oz.	Broadcast just before planting and mix into the top 3-4
,			inches of soil. Note: Resistant onion maggots will not
			be controlled by diazinon or similar-type insecticides.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.
Parsley	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Wireworms	10½-14 oz.	
Peas (succulent only)	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Wireworms	10½-14 oz.]
	Note: Do not use on	dried pea varieties si	uch as dried blackeyed peas.
Peppers	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.

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Crop	Pest	Rate/500 Sq. Ft.	Timing/Special Directions	
Potatoes	Cutworms (Surface and Subterranean)	7-14 oz.	Broadcast and mix into soil just before planting.	
	Wireworms	10½-14 oz.	- Orange Control of the Control of t	
Radishes	Mole Crickets	3½ oz.	Broadcast and mix into soil 2 days before planting.	
Spinach	Cutworms Wireworms	7-14 oz.	Broadcast and mix into soil just before planting.	
Squash (Summer and Winter)	Cutworms Wireworms	7-14 oz.	Broadcast and mix into soil just before planting.	
Sweet Corn	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.	
	Seed Corn Maggots	7-14 oz.	Broadcast and mix into soil 2 inches just before planting.	
Ţ,	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.	
Sweet Potatoes	Wireworms Flea Beetles	10 ½ oz. 10 ½ oz.	Broadcast and mix into soil just before planting.	
Swiss Chard	Cutworms Wireworms	7-14 oz. 10½-14 oz.	.Broadcast and mix into soil just before planting.	
Tomatoes	Cutworms	7-14 oz.	Broadcast and mix into soil just before planting.	
	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.	
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.	
Turnips	Mole Crickets	3½ oz.	Broadcast and mix into soil 1-2 days before planting.	
	Wireworms	10½-14 oz.	Broadcast and mix into soil just before planting.	

Storage and Disposal

Storage: Store in a original container in a cool, dry well-ventilated area. Store product in an area inaccessible to children and domestic animals. Do not store near fertilizers, herbicides, other insecticides, seeds, food or feed. **Pesticide Disposal:** Securely wrap original container in several layers of newspaper and discard in trash. **Container Disposal:** Do not reuse empty container. Discard container in trash.

For minor spills, leaks, etc. follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup and disposal of wastes. In the event of a major spill, fire or emergency call 1-800-888-8372 day or night.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

AUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye injury. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating or smoking. Do not store near food or feed products. Food utensils, such as spoons or measuring cups must not be used for food purposes after use in measuring pesticides. Do not contaminate ornamental fish ponds. Do not allow children or pets on treated areas until granules have been watered into the soil and the grass or soil is dry.

First Aid
This product contains diazinon, an organophosphate insecticide that inhibits cholinesterase.

If Swallowed	have d'atal and a sais a sastat a sais a la trade de la company de la co
ii Swallowed	Immediately call a poison control center or doctor 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 or convulsing person.
If Inhaled	Move person to fresh air.
	If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.
	Call a poison control center or doctor for further treatment advice.
If on Skin	Take off contaminated clothing.
or Clothing	Immediately rinse skin with plenty of water for 15-20 minutes.
	Call a poison control center or doctor for treatment advice.
If in Eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	Call a poison control center or doctor for treatment advice.
	ict container or label with you when calling a poison control center or doctor, or going for treatment. [You ct 1-800-xxx-xxxx for emergency medical treatment information.]

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Note to Physician: 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.

{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Environmental Hazards

This product is highly toxic to birds, fish and other wildlife. Birds, 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. Granules that are spilled or are visible on soil surfaces should be covered with soil or thoroughly mixed into the soil.

For lawns, 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, such as ponds or lakes, which may attract waterfowl.

Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not apply directly to water. 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 washwaters.

EPA Est.

Сору	Made in U.S.A.	Product Code:
а	Enforcer Pr Division of National Ser P.O. Box	vice Industries, Inc.
	Cartersville, GA	
Denotes alternate/optional language Denotes language that does not appear	,	33125 1333

EPA Reg. No. 40849-30