

MAY 08 1995

Mr. Robert B. Adams
CTX, Inc.
481 Scotland Road
McHenry, Illinois 60050

Dear Mr. Adams:

Subject: Addition of Indoor Use Sites
Chem-Tox Dursban 12
EPA Registration No. 45385-54
Your Submission Dated February 7, 1995

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

2. Make the following labeling changes before you release the product for shipment bearing the amended labeling:

- a. In the Directions for Use, under the subheading "Pest Control Indoors - Application within Residential Buildings" the first sentence includes the phrase "...within nonfood areas of Industrial...etc." Instructions for use within food areas, however, follow this sentence. Correct this inconsistency by changing the first sentence to read: "...within food and nonfood areas."
- b. The last page of the label is a continuation of the indoor use directions. These should not be split off from the rest of the indoor use text (pages 2 and 3). The label format must be adjusted, preferably with the warranty statement (Terms of Sale) on the last page.

3. Submit two copies of your final printed labeling before you release the product for shipment.

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

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

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CHEM-TOX DURSBAN* 12 INSECTICIDE

Controls numerous pests in and around Residential Buildings and Food Handling Establishments. Also recommended for control of WOOD DESTROYING PESTS, Pests on the Outside Surface of Buildings, FIRE ANT CONTROL, and area control of TICKS and CHIGGERS.

To be Applied Only By or Under the Supervision of Pest Control Operators or Other Trained Personnel Responsible for Insect Control Programs.

Active Ingredients:
chlorpyrifos: O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) phosphorothioate.....12.6%
Inert Ingredients.....87.4%
*Trademark of DowElanco

E.P.A. Registration No. 45385-54
E.P.A. EST. NO. 45385-IL-01

Chem-Tox, Inc. McHenry, IL 60050

Keep Out Of Reach Of Children

WARNING

Notice: Read the entire label. Use only according to label directions. Before buying or using this product, read "Terms of Sale".

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

WARNING - Causes eye irritation, harmful if swallowed. Do not take internally. Do not get in eyes, on skin or clothing. Wash thoroughly after handling. Wash contaminated clothing before reuse. Avoid breathing vapors and spray mist. Avoid spraying food crops. Keep away from food, feedstuffs and domestic water supplies. Keep container closed. Handle concentrate in a ventilated area. Do not allow children in treated area until spray has dried.

STATEMENT OF PRACTICAL TREATMENT

If swallowed-Do not induce vomiting. Contains aromatic petroleum solvent. Call physician immediately. In cases of skin contact, remove contaminated clothing and immediately wash skin with plenty of soap and water. If in eyes, flush eyes with plenty of water for at least 15 min. Call a physician. **NOTE TO PHYSICIAN:** Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine only by injection is an antidote.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and wildlife. 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. Shrimp and crabs may be killed at application rates recommended on this label. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment washwater. Apply this product only as specified on this label. 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.

PHYSICAL OR CHEMICAL HAZARDS

Combustible - Do not use or store near heat or open flame

ACCEPTED
with COMMENTS
by EPA Letter D-201

MAY 08 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act
45385-54

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all directions for use before applying this product.

STORAGE AND DISPOSAL

STORAGE: Store in original container only, preferably in a locked area. Keep container tightly closed when not in use. Store in a cool, dry place. Do not use food or drink containers for mixing or storage.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage and disposal. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency for guidance. **CONTAINER DISPOSAL:** Plastic: Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

HANDLING PROCEDURES:

* Do not allow spray to contact food or food-contacting surfaces. Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated through the application of this product.

- * Remove pets before spraying; cover aquaria/fish bowls.
- * Keep out of fish pools and other bodies of water.
- * Allow spray to dry before allowing people or pets on treated areas.

MIXING INSTRUCTIONS:

When diluting Durshan 12 Insecticide, first add approximately one-half of the water to the spray tank; add the proper amount of Durshan 12. Close the tank and shake for 5 to 10 seconds; then slowly add the remaining water.

To make a 0.25% spray - add 2 2/3 ounces of Durshan 12 to one gallon of water.

To make a 0.50% spray - add 5 1/3 ounces of Durshan 12 to one gallon of water.

PEST CONTROL INDOORS

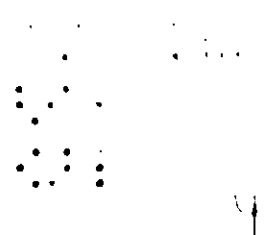
Use Durshan 12 Insecticide to control pests listed in the following table by application at the recommended dosages. Use a 0.25% spray to control light infestations or a 0.50% spray to quickly reduce heavy infestations or for extended residual control. To prepare the spray, dilute Durshan 12 Insecticide with water.

APPLICATION WITHIN RESIDENTIAL BUILDINGS

Applications may be made within residential buildings, including Homes and Apartment Buildings and within nonfood areas of Industrial, Institutional and Commercial Buildings including Hospitals, Stores, Manufacturing Plants and Warehouses. Do not apply this product to conduits, motor housings, junction boxes, or other electrical equipment because of possible shock hazard.

Apply as a pinstream or as a coarse, low pressure spray to localized areas in and around both food and non-food areas. Treat where insects are found or normally occur, including, but not limited to, dark corners of rooms and closets, floor drain, cracks and crevices in walls and floors, around doors, windows and other areas where insects may enter, along and behind baseboards, beneath and behind sinks, stoves, refrigerators, refrigerator units and cabinets, and around plumbing and other utility installations.

Do not allow spray to contact food, foodstuffs, or water supplies. Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated by application of this product. Do not allow people or pets to contact treated surfaces until spray has dried. Remove pets and cover fish bowls (tanks) before spraying. Do not introduce the spray into the air or allow the spray to contact food or food-containing surfaces.



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APPLICATION WITHIN FOOD HANDLING ESTABLISHMENTS

Places other than private residences in which food is held, processed, prepared or served including, but not limited to, Restaurants, Grocery Stores, Bakeries, Bottling Plants, Canneries and Grain Mills. Mix Dursban 12 according to the dilution rates above. Applications of this product in Food Handling Establishments other than as a spot and/or crack & crevice treatment are not permitted. Use as a SPOT TREATMENT to control Ants, Cockroaches, Clover Mites, Confused Flour Beetles, Crickets, Earwigs, Firebrats, Indian Meal Moths, Rice & Granary Weevils, Mediterranean Flour Moth, Millipedes, Red Flour Beetle, Saw Toothed Grain Beetle, Silverfish and Spiders in and around both food and nonfood areas by application as a coarse, low-pressure (20 PSI or less) spray to localized areas where the above pests have been seen, suspected of hiding or entering. Apply only enough spray to thoroughly cover the surfaces treated using special care to avoid unnecessary runoff.

Control of Wood-Infesting Insects

Use Dursban 12 Insecticide for the control of wood-infesting insects found in and around homes and other structures. For treatment of small areas, apply by brushing or spraying the diluted spray evenly on wood surfaces. For large or overhead areas, use a coarse, low-pressure spray, being careful to avoid dripping or run-off. Suitable protective clothing should also be worn in confined or overhead areas to help avoid exposure to eyes and skin. As a minimum, eye protection, protective head covering, chemically resistant gloves and footwear, a long-sleeved shirt and long-legged pants or coveralls are recommended. Do not permit people or pets to contact treated surfaces until spray has dried. Treated areas (especially those which are confined) should be ventilated during and immediately following application before the areas are reoccupied.

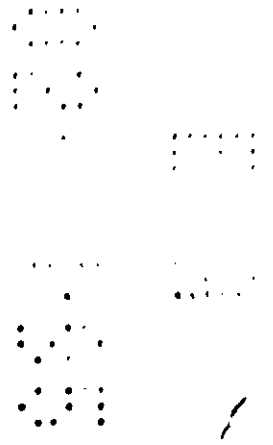
Protect structures or other wood items such as mailbox posts, fence posts, bird feeder support posts, play houses, wooden swing sets, or other places where wood comes in direct contact with soil. Mix Dursban 12 in water and apply to soil before setting posts or placing wood onto or into soil. Thoroughly wet soil and allow mixture to soak into soil before placing wood into or onto soil. Do not handle or contact treated soil. Cover treated soil with untreated soil once posts are set or after wood is placed onto soil to prevent contact with treated soil. This product may only be used as a soil treatment for the listed sites. Do not use this product as a surface spray to these sites.

To control wood-infesting insects as well as other pests that find shelter in wood piles dilute Dursban 12 and apply using a coarse, low pressure spray. Treat as thoroughly as possible by removing wood as necessary to treat the ground below the wood pile. Apply to surfaces to wet but avoid excessive run-off.

Mix a 0.5% spray for the following insects:

- Deathwatch beetles (1)
- False powderpost beetles (1)
- Appletwig borer (1)
- Longhorned beetles (1)
- Powderpost beetles (1)
- Carpenter ants and other wood-infesting ants (2)
- Carpenter bees (3)
- Termites (4)

Numbers in parentheses refer to Specific Directions



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Specific Directions:

(1) For beetles, spray infested areas and areas where infestations are likely to occur, including, but not limited to, wood surfaces, voids and channels in damaged wood, in spaces between wooden members of a structure, and between wood and foundations. Applications may be made to inaccessible areas by drilling and by then injecting the solution.

(2) For wood infesting ants, apply the spray around doors and windows and other places where these ants enter the premises and where they crawl and hide. Also spray into cracks and crevices or through openings or small holes in wall voids or other areas where these ants or their nests are present. Do not spray water based sprays into electrical outlets or utilities.

(3) For carpenter bees, spray or inject insecticide into holes and tunnels already made by carpenter bees, or spray onto localized areas where carpenter bees are beginning to build tunnels in wood.

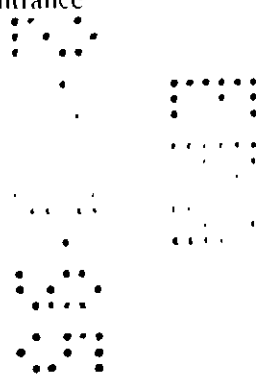
(4) For termites, spray localized areas of structures, including voids and channels in damaged wood, in spaces between wooden members of a structure and between wood and foundations where infestation is likely to occur. Treatment of localized areas is intended to kill workers and winged reproductive forms of termites in the treated areas.

Outdoors: Remove all wood debris and wood forms. Determine the extent of termite infestation. For prevention and light infestation, treat soil adjacent to both sides of infested foundations of poured concrete piers by digging a trench 6 inches wide and 4 inches deep. If footing is more than 12 inches deep, make holes with a crowbar, pipe or rod about one foot apart that extend from the trench bottom to the top of the footing. Make holes closer in hard-packed clay soils. NEVER DIG BELOW THE TOP OF THE FOOTING. Avoid contamination of public and private water supplies by following these precautions. Do not allow a hose or any type of faucet extension to reach into the termite chemical solution while filling or mixing this material with water. Use antibackflow or anti-siphonage equipment on all filling equipment. These devices can be purchased at hardware and plumbing supply stores. Use of anti-backflow equipment will help insure that the user of this chemical will not contaminate domestic water supplies. Refer to FHA (Federal Housing Administration), state and local specifications for safe distances of treatment areas from wells. Soil in the vicinity of wells, cisterns or ponds should not be treated. Do not treat structures that contain cisterns or wells. NOTE: When conditions will not permit trenching, surface application adjacent to interior foundation walls may be made but the treated strips should not exceed 18" in width. Apply solution with a sprinkling can. Mix 5 1/3 fluid ounces per gallon of water and treat 2 1/2 linear feet of trench or foundation (one half gallon of concentrate will make 12 gallons of diluted solution and treat 30 linear feet). Mix solution into soil as it is replaced in the trench. Cover treated soil with a layer of untreated soil. Be sure to treat the interiors of accessible hollow block foundations at the same rate as above. Be careful to have adequate ventilation when treating areas under structure. For severe infestation or treatment under slabs, in basements and buildings with insufficient crawl space etc., contact a licensed pest control operator or termite control service. Retreatment for subterranean termites should only be made when there is evidence of reinfestation subsequent to the initial treatment, or there has been a disruption of the chemical barrier in the soil due to construction, excavation, landscaping etc. Reapplication should be made as a spot treatment to those areas. Annual retreatment of the entire premises must be avoided.

Pest Control on Outside Surfaces and Around Buildings:

For Outside Surfaces mix 5 1/3 ounces of Durshan 12 to 1 gallon of water.

Apply Durshan 12 as a residual spray to outside surfaces of buildings and surrounding areas, including porches, window frames, doorways, foundations, eaves, patios, garages, refuse dumps, garbage cans and garbage areas, and other areas where pests congregate or have been seen or where they can gain entrance. Repeat treatment as needed.



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Pests controlled by applying Dursban 12 to outside surfaces include.

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| Ants | Flies |
| Bees | Hornets |
| Beetles (1) | House Flies |
| Box Elder Bugs | Millipedes |
| Carpenter ants (1) | Mosquitoes |
| Carpenter bees (1) | Scorpions (3) |
| Centipedes | Silverfish |
| Clover mites | Sowbugs |
| Cockroaches (American, Smoky Brown) | Spiders |
| Crickets | Springtails |
| Earwigs | Ticks |
| Elm Leaf Beetles | Wasps |
| Fire Ants (including foraging workers) | Yellow jackets |
| Fleas (2) | |

Specific Directions:

- (1) For additional information, see section on Control of Wood-Infesting Insects.
- (2) For effective flea control outdoors, ensure that areas where the pet or other animals spend time such as kennels, runs or other resting areas are thoroughly treated.
- (3) For scorpions, remove accumulations of lumber, firewood, and other materials which serve as harborage sites and treat areas beneath and adjacent to infested areas.

Area Control of Ticks, Fleas and Chiggers

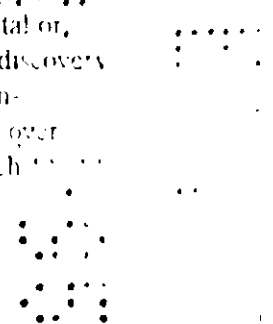
Use Dursban 12 to control ticks and chiggers infesting non-cropland areas such as roadsides, footpaths and trails, picnic and camping sites, parks, recreational areas and around dwellings where these pests are present, create a nuisance or are acting as a disease vector. Apply at the rate of two pints per acre (2 fluid ounces per 2,700 square feet) using a hydraulic sprayer, mist applicator, knapsack sprayer or other suitable hand or power spray equipment. Treat low underbrush, grassy areas, weeds and ground surface and debris using enough spray volume to obtain thorough coverage, usually 40 to 100 gallons per acre. **NOTICE:** Do not allow use of treated areas during application or until spray has dried. Do not apply when weather conditions favor drift from treated areas. Do not apply where runoff into lakes, streams, ponds or other bodies of water is likely to occur. Fish and crustaceans may be killed if their waters are contaminated with this product.

FIRE ANT CONTROL - INDIVIDUAL MOUND TREATMENT

Mix 4 fluid ounces in 4 gallons of water and apply as a drench using a sprinkling can. Gently apply one gallon of the mixture over the surface of each mound. Thoroughly wet mound and surrounding area of 3 x 4 feet. For best results apply in cool weather (65-80 F) early or late in the day. Treat new mounds as they appear. Pressurized sprays may disturb ants and cause migration which will reduce product effectiveness.

TERMS OF SALE on purchase or use of this product

Warranty: Manufacturer and seller warrant that this product, as of the time of sale, conforms to the ingredient statement on the label, and is reasonably fit for the purpose set forth in the Directions for Use. Except as so warranted, the product is sold as is. Manufacturer makes no other warranty expressed or implied. **Damages:** Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages, not exceeding the purchase price and shall not include incidental or consequential damages. Notice of any claim must be reported to manufacturer within 10 days of discovery by buyer or user, failing which buyer or user waives any claim for such damage. Excuse from non-controllable conditions. Because of certain critical conditions created or incurred by buyer or user over which manufacturer from liability arising out of handling or use of the product attributable to such causes. No person is authorized to vary or waive any statement contained herein.



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Pests Controlled using Dursban 12 Insecticide Indoors:

- Cockroaches (American, Brownbanded, German, Oriental, Smoky brown) (2)
- Carpet Beetles*(5)
- Clover Mites*
- Flour Beetles (Confused, Red)
- Ants (1)
- Carpenter Ants (1)
- Centipedes
- Clover Mites
- Crickets
- Earwigs
- Mediterranean Flour Moths
- Millipedes
- Rice Weevils
- Ticks* (4) (American Dog Tick, Brown Dog Tick, Deer Tick, Lone Star Tick)
- Fire Ants
- Firebrats
- Fleas (3)
- House Flies
- Indian Meal Moths
- Saw-toothed Grain Beetles
- Silverfish
- Spiders
- Springtails
- Scorpions
- Sowbugs

Numbers in parentheses refer to Specific Directions
 * The indicated pests should be treated with the 0.5% rate

Specific Directions:

- (1) For ants apply to ant trails and around doors and windows and wherever else these pests live or may find entrance. Treat nest if possible
- (2) A period of 4 to 7 days is normally required for maximum effect on cockroach populations
- (3) For control of fleas, prior to treatment, carpets, floors and upholstery should be vacuumed thoroughly and vacuum cleaner bag discarded in an outdoor trash container. Cover aquaria and fish bowls and remove all pets such as birds, dogs and cats from area prior to treating. Thoroughly apply as a spot treatment to infested areas such as pet resting quarters, nearby cracks and crevices, along and behind baseboards, and localized areas of floor and floor covering where these pests may be present. Old bedding of pets should be removed and replaced with clean, fresh bedding after treatment of pet area. Due to the life cycle of fleas, repeat application 7 to 10 days after first application may be necessary to completely eliminate a population. **DO NOT TREAT PETS WITH THIS PRODUCT.** To control the source of flea infestation, pets inhabiting the treated premises should be treated with a product registered for application to animals. Consult your veterinarian for appropriate products. Pets should not be treated with an organophosphate insecticide when this product is used in or on the premises to avoid "double exposure" to pets.
- (4) For the control of ticks indoors, thoroughly apply as a spot treatment to infested areas such as pet resting quarters, nearby cracks and crevices, along baseboards, windows and door frames, and areas of floor and floor coverings where these pests may be present. Old bedding should be removed and replaced with clean, fresh bedding after treatment.
- (5) For the control of carpet beetles, thoroughly as a spot treatment to rugs, carpets, along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets and on shelving and wherever else these insects are seen or suspected.

Do not permit people or pets to contact treated surfaces until the spray has dried.

