



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

December 11, 2023

Leanna Bosarge
Director, Regulatory Affairs
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: Label Amendment – Implementing Chlorpyrifos Biological Opinion (BiOp)
Mitigation and General Updates
Product Name: CSI 1.5 ULV
EPA Registration Number: 53883-251
Application Date: November 8, 2022
Decision Number: 588671

Dear Leanna Bosarge:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Chlorpyrifos 2022 Biological Opinion and has concluded that your submission is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website

is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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

If you have any questions, please contact Briana Hanlon at (202) 566-2716 or at hanlon.briana@epa.gov.

Sincerely,



Michael Walsh
Product Manager 11
Invertebrate & Vertebrate Branch 2
Registration Division
Office of Pesticide Programs

CSI 1.5 ULV

[alt. brand name: PyroFos™1.5 ULV Vector Control Insecticide]

[alt. brand name: PyroFos™ 1.5 ULV

For Use Outdoors to Control Adult Mosquitoes in Residential and Recreational Areas.

Active Ingredient:

Chlorpyrifos: 0,0-diethyl 0-(3,5,6-trichloro-2-pyridinyl) phosphorothioate.....	19.36%
Other Ingredients:.....	80.64%
Total	100.00%

Contains 1.5 pounds chlorpyrifos per gallon
 Contains petroleum distillate

KEEP OUT OF REACH OF CHILDREN

CAUTION

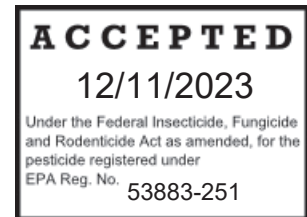
FIRST AID	
Have product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® International for emergency medical treatment at (866) 897-8050.	
IF SWALLOWED:	Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not <u>give anything</u> by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	Take off contaminated clothing. Rinse skin immediately 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 the eye. Call a <u>poison control center or doctor for treatment advice.</u>
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth. Call a poison control center or doctor for further treatment advice.
NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine is antidotal. 2-PAM may be effective as an adjunct to atropine. This product contains petroleum distillate. Vomiting may cause aspiration pneumonia.	

EPA Reg. No. 53883-251

EPA Est. No. XXXXX-XX-XXX

Net Contents: ___ gal.

Manufactured By:
 Control Solutions, Inc.
 5903 Genoa-Red Bluff
 Pasadena, TX 77507



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE): All mixers and loaders involved in ground application must wear coveralls over long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves made of barrier laminate, nitrile rubber \geq 14 mils, Neoprene rubber \geq 14 mils, or Viton \geq 14 mils, and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A.; or a NIOSH-approved powered air purifying respirator with an HE filter with NIOSH approval number prefix TC-21C. Applicators involved in ground ULV application must use an enclosed cab as described in the Engineering Controls Section of this label and must wear long-sleeved shirt and long pants, shoes plus socks, and chemical-resistant gloves. Aerial applicators and pilots must use an enclosed cockpit and wear long-sleeved shirt, long pants, shoes, and socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Engineering Controls: Ground applicators must use an enclosed cab that has a nonporous barrier that totally surrounds the occupants and prevents contact with pesticides outside the cab. Applicators must be provided and have immediately available for use in an emergency when they exit the cab in the treated area: coveralls, chemical-resistant gloves made of barrier laminate, nitrile rubber \geq 14 mils, Neoprene rubber \geq 14 mils, or Viton \geq 14 mils, and a respirator of the type specified in the PPE section of this labeling. Take off any PPE that was worn in the treated area before reentering the cab and store all such PPE in a chemical-resistant container, such as a plastic bag, to prevent contamination of the inside of the cab.

Mixers and loaders involved in aerial application must use a closed system designed by the manufacturer to enclose the pesticide to prevent it from contacting handlers or other people and which is used and maintained in accordance with the manufacture's written operating instructions. Mixers and loaders using a closed system must wear protective eyewear if the system operates under pressure and must have immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown coveralls, chemical-resistant gloves made of barrier laminate, nitrile rubber \geq 14 mils, Neoprene rubber \geq 14 mils, or Viton \geq 14 mils, chemical-resistant footwear, chemical resistant apron and a respirator of the type specified in the PPE section of this labeling.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, small mammals and birds. Runoff from treated areas or deposition of spray droplets into a body of water may be hazardous to fish and aquatic invertebrates. Do not apply over bodies of water (lakes, rivers, permanent streams, natural ponds, commercial fish ponds, swamps, marshes or estuaries), except when necessary to target areas where adult mosquitoes are present, and weather conditions will facilitate movement of applied material beyond the body of water in order to minimize incidental deposition into the water body. Do not contaminate bodies of water when disposing of equipment rinsate or wash waters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area, except when applications are made to prevent or control a threat to public and/or animal health determined by a state, tribal or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes, or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved

by the state or tribe during a natural disaster recovery effort.

PHYSICAL OR CHEMICAL HAZARDS

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

DIRECTIONS FOR USE

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

For use only by federal, state, tribal or local government officials responsible for public health or vector control, or by persons certified in the appropriate category or otherwise authorized by the state or tribal lead pesticide regulatory agency to perform adult mosquito control applications, or by persons under their direct supervision.

Before making the first application in a season, it is advisable to consult with the state or tribal agency with primary responsibility for pesticide regulation to determine if other regulatory requirements exist.

CSI 1.5 ULV is recommended for application either as a thermal fog or as an ultra low volume (ULV) nonthermal aerosol (cold fog) to control adult mosquitoes in outdoor residential and recreational areas and other non-cropland areas where these insects are a problem. For best results treat when mosquitoes are most active and weather conditions are conducive to keeping the spray cloud close to the ground. An inversion of air temperatures and a light breeze are preferable. Application in calm air conditions is to be avoided. Apply only when ground wind speed is greater than 1 mph. Air temperatures should be greater than 50° F when conducting applications.

Do not treat a site with more than 0.01 pounds of chlorpyrifos per acre in a twenty-four hour period. Do not exceed 0.26 pounds of chlorpyrifos per acre per year. More frequent applications may be made to prevent or control a threat to public and/or animal health determined by a state, tribal, or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or tribe during a natural disaster recovery effort.

ENDANGERED SPECIES PROTECTION REQUIREMENTS:

It is a Federal offense to use any pesticide in a manner that results in an unauthorized “take” (e.g., kill or otherwise harm) of an endangered species and certain threatened species under the Endangered Species Act section 9. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product. You must obtain a Bulletin no earlier than six months before using this product. To obtain Bulletins, consult <http://www.epa.gov/espp/>, call 1-844-447-3813, or email ESPP@epa.gov. You must use the Bulletin valid for the month in which you will apply the product.

Reporting Ecological Incidents: To report ecological incidents, including mortality, injury, or harm to plants and animals, call 1-800-242-5562.

INSECTICIDE RESISTANCE MANAGEMENT (IRM) RECOMMENDATIONS

For resistance management, CSI 1.5 ULV contains a Group 1B insecticide. Any insect population may contain individuals naturally resistant to Group 1B insecticides. In insect populations expressing resistance to Group 1B insecticides, the resistant individuals may dominate the insect population if these groups of insecticides are used repeatedly alone or in combination in the same area. Appropriate resistance-management strategies should be followed.

To delay insecticide resistance, take the following steps:

- Adopt an integrated pest management program for insecticide use that includes surveillance, uses historical information related to pesticide use, record keeping, and which considers biological and other chemical control practices.
- Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, contact your local university specialist or Control Solutions, Inc. representative.
- Contact your local extension specialist, technical advisor, and/or Control Solutions, Inc. representative for any additional pesticide resistance-management and/or IPM recommendations for the specific site and pest

- problem in your area.
- For further information or to report suspected resistance, contact your local Control Solutions, Inc. representative by calling 1-800-242-5562.

SPRAY DROPLET SIZE DETERMINATION

Ground-based Application: For application as an ultra low volume (ULV) nonthermal aerosol (cold fog) spray, equipment must be adjusted so that the volume median diameter (VMD) is between 8 and 30 microns ($8 \leq D_v \leq 30$ um) and that 90% of the spray is contained in droplets smaller than 50 microns ($D_v < 50$ um). Directions from the equipment manufacturer or vendor, pesticide registrant or a test facility using a laser-based measurement instrument must be used to adjust equipment to produce acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rate(s) are properly calibrated.

Aerial Application: Spray equipment must be adjusted so that the volume median diameter produced is less than 60 microns ($D_v < 60$ um) and that 90% of the spray is contained in droplets smaller than 115 microns ($D_v < 115$ um). The effects of flight speed and, for non-rotary nozzles, nozzle angle on the droplet size spectrum must be considered. Directions from the equipment manufacturer or vendor, pesticide registrant or a test facility using a wind tunnel and laser-based measurement instrument must be used to adjust equipment to produce acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rate(s) are properly calibrated.

GROUND ULV APPLICATION

Thermal Fog Application: To prepare a fog solution, thoroughly mix 6 gallons of **CSI 1.5 ULV** in 94 gallons of No. 2 fuel oil or other fuel, diesel or kerosene-type oil suitable for insecticide and fogging use. Apply the finished fog solution with any standard thermal fog machine calibrated to deliver 52.5 gallons per hour at an average vehicle speed of 5 mph to cover a swath of up to 300 feet.

ULV Nonthermal Aerosol (Cold Fog) Application: Apply **CSI 1.5 ULV** through standard ULV cold aerosol or non-thermal aerosol (Cold Fog) generators undiluted at a flow rate of 2.7 to 5.3 fluid ounces per minute at an average vehicle speed of 10 mph. This is equivalent to 0.005 to 0.01 pounds of chlorpyrifos per acre based on an effective swath width of 300 feet. Under normal residential conditions a flow rate of 4.3 fluid ounces per minute is recommended. If a different vehicle speed is used, adjust rate, accordingly. An accurate flow meter must be used to ensure the proper flow rate.

Chlorpyrifos pounds/acre	Application Rate (Fl. oz. per Minute)				Fl. oz. per acre
	5 mph	10 mph	15 mph	20 mph	
0.01	2.6	5.3	7.9	10.5	0.87
0.008	2.1	4.3	6.4	8.6	0.71
0.005	1.4	2.7	4.1	5.4	0.45

For proper application, mount the applicator so that the nozzle is at least 4 1/2 feet above ground level and directed out the back of the vehicle. Failure to follow the above directions may result in reduced effectiveness and oversize spray droplets, which may deposit on and permanently damage automobile paint.

AERIAL APPLICATION

CSI 1.5 ULV may be applied undiluted at rates up to 0.87 fluid ounces **CSI 1.5 ULV** per acre (0.01 pounds of chlorpyrifos per acre) by fixed wing or rotary aircraft equipped with suitable ULV application equipment. Aerial application shall be made altitudes ranging from 75 to 300 feet.

IN FLORIDA: Not for aerial application in Florida unless specifically authorized by the Bureau of Entomology, Florida Department of Agriculture & Consumer Services.

STORAGE AND DISPOSAL

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

Storage and Spill Procedures: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spillage or leakages, soak up with an absorbent material such as sand, sawdust, earth, Fuller's earth, etc. Dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal:

For Containers equal to or less than 5 Gallons: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

For Containers greater than 5 Gallons: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

For Bulk containers: (Refillable Container) Refill this container with pesticides only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the re-filler. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or re-circulate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

NOTICE: Seller makes no warranty, expressed or implied concerning the use of this product other than as indicated on the label. To the extent consistent with applicable law, Buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label instructions.