

JUL 30 1990

Ms. Diana Williams
Security Products Company of Delaware
485 Oak Place, Suite 370
Atlanta, GA 30349

Subject: Amendment: Revise per Diazinon Registration Standard
and the Agency's May 1, 1990 Data Call-In letter
to reflect only those uses supported by Ciba-Geigy
Security Brand Yard & Vegetable Garden Granules
EPA Reg. No. 56644-30
Your submission dated June 8, 1990

Dear Ms. Williams:

The amendment referred to above, submitted in connection with a registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable provided the following revisions are made prior to release for shipment under the amended labeling:

- 1) In the Statement of Practical Treatment, revise the last sentence of the "IF SWALLOWED" advice to read "Do not induce vomiting or give anything by mouth if person is unconscious or convulsing."

[NOTE: When preparing your label, do not print the quotation marks appearing around revised text items specified in this letter.]

- 2) Revise the "Hazards to Humans and Domestic Animals" text to read:

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing dust and contact with eyes, skin, or clothing. Wash thoroughly after handling and before eating or smoking. May cause contact sensitization following repeated contact with skin of susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. 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.

3) Revise the Environmental Hazards text to read as follows:

This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, 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 and waterfowl. Avoid overlapping granules. Where irrigation (watering) is recommended in the directions, or if waterfowl, i.e. ducks or geese, can be expected in the treated area after treatment (except spot treatment), apply a minimum of 1/4 inch of water immediately after applying this product. Stop irrigation before puddling occurs. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Runoff may be hazardous to 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.

- 4) Revise the the heading "In Gardens Security Diazinon Granules Kills" to show the correct name for this product (as indicated above in the "Subject" section of this letter - you may use the symbol ® rather than "Brand") and delete the pests "Armyworms", "Carrot Rust Flies", "Corn borers", and "Rootworms" since these pests are associated with use patterns not being supported by Ciba-Geigy for diazinon reregistration.
- 5) Be sure to use the correct full name for this product (see item "4" above) in any introductory paragraphs, such as that appearing directly under the heading "Overall Lawn Application".
- 6) Based on available field studies, Ciba-Geigy is supporting only one application rate for lawns regardless of the type of lawn or type of pest. For this product that rate is 2 pounds per 1000 sq. ft., which is the basic rate given on your label. Therefore, delete "For heavy lawns such as St. Augustine grass lawns, the rate should be increased to 3 lbs. per 1000 sq. ft. (or 4.8 oz per 100 sq. ft.)". Also, revise the rate for billbug and white grub control down to 2 lbs. per 1000 square feet.
- 7) For the reason given in item "6" above, delete the headings and associated columns "St. Augustine Lawn 3 lbs." and "White Grubs, Billbugs 2 1/2 lbs." from the spreader setting table. Revise the table heading to "LAWN SPREADER SETTING NO. (To deliver 2 lbs./1000 sq. ft.)". Delete "2 lbs." from the column heading "Grass or Dichondra Lawn", since there is only one acceptable rate and that will now appear in the revised table heading.

directly after the directions for Hyperodes weevil control (i.e., just before the overall lawn use directions change over to spot treatment directions). Once relocated, you may delete "Insects listed below" from the table, as well as the listing of insect pests, since these same pests are already listed at the beginning of the overall lawn use directions.

- 8) Under the heading "GARDEN INSECT CONTROL", delete ", except where applied in seed furrow", since that application method is not being supported for diazinon reregistration.
- 9) For beans (including lima beans, pole beans, and snap beans) and peas, use is now limited to succulent varieties only. It is noted that you have added "(succulent varieties only)" after "peas" (even though it intrudes into the listing of crop names), but have not done so for the various types of beans (although there is a footnote, inappropriate to pre-plant soil application use, and which can be deleted, regarding use of treated vines and hay for feed). To avoid cluttering up the crop listings, it would be preferable to add a couple of sentences to the general information paragraph under the heading GARDEN INSECT CONTROL, such as: "For beans and peas, use on succulent varieties only. Do not use on dried bean varieties such as pintos, dried limas, navy beans, etc., or on dried pea varieties such as blackeyed peas.". This same label section is also the preferred location to add the required statement "Do not use on commercially-grown potatoes which will be hand-harvested.".
- 10) In the directions for control of mole crickets, delete the crop "strawberries" since this is not a supported use for granular diazinon. Also, revise the application rate for mole crickets to 3 1/2 oz. per 500 sq. ft..
- 11) Delete the crop "carrots" and the associated in-furrow directions to control carrot rust flies. As noted above, in-furrow application of diazinon is not a supported application method.
- 12) Delete the directions for in-furrow application to onions for onion maggot control. Based upon a revision to the Ciba-Geigy label, you may revise the directions for this pest to read: "Broadcast just before planting and mix into the top 3-4 inches of soil. Note: Diazinon may not control organophosphate-resistant onion maggots.".
- 13) Delete the separate crop name "Radishes" and the associated in-furrow directions for control of root maggots. As noted above, in-furrow application of diazinon is not a supported application method.
- 14) Based on the results of avian field studies, Ciba-Geigy is not supporting hand application or post-emergence application of granular diazinon to corn. Delete the pest claims and associated directions for control of corn rootworms, European corn borers, Fall armyworms, and Southwestern

corn borers on sweet corn. Since the only remaining uses, control of cutworms and wireworms, are already covered in crop group paragraphs, it would be easier to include sweet corn in those sections. However, if you elect to keep these directions separate, then revise the rate for wireworms on sweet corn to 7-14 oz per 500 sq. ft. and adjust the depth of mixing into the soil for surface cutworm control to 2-3 inches.

- 15) Delete the directions for control of vinegar flies (Drosophila) on tomatoes. Ciba-Geigy is not supporting this foliar application use.
- 16) Delete the separate crop name "Turnips" and the associated in-furrow directions for control of root maggots. As noted above, in-furrow application of diazinon is not a supported application method.

A stamped copy of the label is enclosed for your records. Please submit five (5) copies of the revised amended label prior to release for shipment under the amended labeling.

Please refer to the Diazinon Registration Standard, as amended, for release for shipment and channels of trade dates for diazinon products bearing appropriately amended labels.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (E7505C)

5710

SECURITY

DIAZINON

Yard & Vegetable

Garden Granules

Not to be used on Golf Courses or Sod Farms

ACTIVE INGREDIENT:

Diazinon [O,O-Diethyl O-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate.....

5.0%

INERT INGREDIENTS.....

95.0%

Total

100.0%

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

JUL 30 1990

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.

56644-30

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back panel

EPA Reg. No. 56644-30

EPA Est. No. 769-GA-1

NET WEIGHT 1 LB.

Distributed By:

**The Security Products Company of Delaware, Inc.
Atlanta, Georgia 30349**

6 9 10
SECURITY®

Diazinon

Yard & Vegetable Garden Granules

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person. **IF INHALED:** Remove victim to fresh air and apply respiration if indicated. **IF ON SKIN:** Wash with soap and water. **IF IN EYES:** Flush with water for 15 minutes and call a physician immediately. **NOTE TO PHYSICIAN:** Atropine sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine sulfate.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contamination of food and feed. Do not store near food or feed products. Avoid inhalation of dust. Avoid contact with eyes and clothing. Wash thoroughly after handling and before eating or smoking. May be absorbed through the skin. May cause contact sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result consult a physician. Do not allow children or pets on treated areas until granules have been watered into the soil and the grass or the soil has dried.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish and wildlife. Birds feeding in treated areas may be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and pot-holes). Runoff may be hazardous to aquatic organisms in neighboring areas. Collect or incorporate granules that are spilled during loading or are visible on soil surface in turn areas. Do not contaminate water when disposing of equipment washwaters.

Because of the migratory habits of certain Atlantic Coast waterfowl, do not apply this product in Nassau County, New York between November 1 and May 20. Do not exceed maximum permitted label rates. Rates above those recommended significantly increase potential hazards to birds and waterfowl. Avoid overlapping of granules. Keep out of lakes, streams, ponds, tidal marshes and estuaries (except for effluence from treated watercress beds). Shrimp and crab may be killed at applications rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources.

IN LAWNS SECURITY DIAZINON GRANULES KILLS:

Ants	Fleas
Armyworms	Lawn Moths
Bermudagrass Mites	Leathoppers
Billbugs	Millipedes
Brown Dog Ticks	Sod Webworms
Chiggers	Sowbugs
Chinch Bugs	Springtails
Clover Mites	White Grubs of
Crickets	Japanese Beetle
Cutworms	European Chafer
Digger Wasps	Southern Chafer
Earwigs	

IN GARDENS SECURITY DIAZINON GRANULES KILLS:

Armyworms	Onion Maggots
Carrot Rust Flies	Root Maggots
Corn Borers	Rootworms
Cutworms	Vinegar Flies
Mole Crickets	Wireworms

OVERALL LAWN APPLICATION

SECURITY Diazinon Granules controls the following lawn insects on both grass and dichondra lawns:

Ants, Armyworms, Bermuda Mites, Brown Dog Ticks, Chiggers, Chinch Bugs, Clover Mites, Crickets, Cutworms, Earwigs, Fleas, Lawn Moths (Sod Webworms), Leathoppers, Millipedes, Sowbugs, Springtails (Collembola). Apply SECURITY Diazinon Granules with a fertilizer spreader. See spreader setting chart on bag. Apply when grass is dry. Water lawn lightly after application. Repeat as necessary.

For application with other types of equipment, apply at the rate of 2 lbs. per 1,000 sq. ft. (an area 20' x 50') or 3.2 oz. per 100 sq. ft. (an area 10' x 10'). For heavy lawns such as St. Augustine grass lawns, the rate should be increased to 3 lbs. per 1,000 sq. ft. (or 4.8 oz. per 100 sq. ft.)

IMPORTED FIRE ANTS: To aid in the control of imported fire ants in lawns and other recreational areas, apply 1/2 cup over and 2 ft. around each fire ant mound. Immediately after application, water in thoroughly. A minimum of 1 gallon of water should be applied to each mound area. Reapply as necessary. Apply gently to avoid disturbing ants. Use of high pressure watering equipment may disturb the ants and cause migration, reducing product effectiveness.

NOTE: For best results, apply in cool weather, 65-80°F, or in early morning or late evening hours. Treat new mounds as they appear.

BILLBUGS; WHITE GRUBS OF JAPANESE BEETLE, EUROPEAN CHAFER, SOUTHERN CHAFER, ATAEINUS SPRETULUS (dung beetle): Apply 2.5 lbs. per 1,000 sq. ft. of lawn. Water grass thoroughly after application. For billbug control, apply when activity is first observed or when chewed or brown grass indicates damage from these insects. Repeat as necessary. For grub control, except dung beetle, treat anytime between late July and early October. For dung beetle grub control, apply in spring or early summer when damage is first noticed. Water grass thoroughly with 1/2 in. of water after application. Treat again in late summer or early fall if a second generation occurs.

HYPERODES WEEVILS (New York only): Apply 2 lbs. per 1,000 sq. ft. of grass. Water grass thoroughly after application. Treat problem areas in mid-April and again in mid-May.

SPOT TREATMENT:

Ants: Apply 1 1/2 teaspoons SECURITY Diazinon Granules over and around each ant hill.

Digger Wasps: Apply 1 1/2 teaspoons of SECURITY Diazinon Granules 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 of houses as well as in lawns. Certain of these pests may enter the house.

Ants	Millipedes
Clover mites	Sowbugs (pillbugs)
Crickets	Springtails
Earwigs	(Collembola)

Apply a 5-foot band of SECURITY Diazinon Granules 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. Repeat as necessary.

GARDEN INSECT CONTROL

SECURITY Diazinon Granules controls certain garden insects on crops listed below. Apply just prior to planting and immediately mix thoroughly into soil to the specified depth except where applied in seed furrow.

Cutworms (surface and subterranean):

Broccoli	Kale	Potatoes
Cabbage	Lettuce	Snap Beans*
Cantaloupes	Lima Beans*	Spinach
Cauliflower	Muskmelons	Summer Squash
Celery	Parsley	Swiss Chard
Collards	Peas(succulent varieties only)	Tomatoes
Cucumbers	Peppers	Watermelons
Endive(Escarole)		Winter Squash

Apply 7 to 14 oz. per 500 sq. ft. and mix into soil to a depth of 2-3 inches for surface cutworms, and 3-6 inches for subterranean cutworms. For potatoes, mix into soil 4-6 inches deep.

Mole Crickets:

Broccoli	Kale	Radishes
Cabbage	Lettuce	Strawberries
Cauliflower	Mustard	Tomatoes
Collards	Peppers	Turnips
Endive(Escarole)		

Apply 4 oz. per 500 sq. ft. and mix into the soil to a depth of 1-2 inches.

Wireworms:

Broccoli	Endive(Escarole)	Peppers
Cabbage	Kale	Snap Beans*
Cantaloupes	Lettuce	Spinach
Carrots	Lima Beans*	Summer Squash
Cauliflower	Muskmelons	Sweet Potatoes
Celery	Onions	Swiss Chard
Collards	Parsley	Tomatoes
Corn	Peas(succulent varieties only)	Watermelons
Cucumbers		Winter Squash

Apply 7 to 14 oz. per 500 sq. ft. and mix into soil to a depth of 4-8 inches.

*Note: Do not use vines or hay from dried varieties as feed.

BROCCOLI, CABBAGE, CAULIFLOWER: ROOT MAGGOT—Apply 7 to 11 oz. per 500 sq. ft. over entire seedbed before planting or transplanting and mix into the soil to a depth of 3 to 4 inches.

CARROTS: CARROT RUST FLIES—Apply 7 oz. per 500 sq. ft. in a seed furrow at planting time.

ONIONS: ONION MAGGOTS—Apply 4 oz. per 500 sq. ft. in seed furrow at planting time.

RADISHES: ROOT MAGGOT—Sprinkle lightly at the rate of 3-4 oz. per 500 linear feet of row in seed furrow at planting time.

SWEET CORN: CORN ROOTWORM—Apply 4-7 oz. per 500 sq. ft. in a band over the row at planting time. **CUTWORMS**—Apply 7-11 oz. per 500 sq. ft. Mix into soil to a depth of 1-2 inches for surface cutworms and 3-6 inches for subterranean cutworms.

EUROPEAN CORN BORER - Apply 4-7 oz. per 500 sq. ft. over corn so granules fall into whorls when 75% of the plants show first generation larvae feeding and again 7 days later if needed. Treat for second generation when there is an average of 1 egg mass per plant.* **FALL ARMYWORMS** - Apply 4-7 oz. per 500 sq. ft. over corn so granules fall into whorls and when larvae first appear and again 7 days later if needed. Treat for second generation armyworms if necessary.*

***SOUTHERN CORN BORER** - Apply 4-7 oz. per 500 sq. ft. over corn so granules fall into whorls when second generation larvae first appear. Repeat applications one week later.

***NOTE:** Corn may be picked immediately following last application. Do not feed fodder to livestock for ten days following last application. Do not apply to corn during the pollen shed period. **WIREWORMS** - Apply 7-15 oz. per 500 sq. ft. in a broadcast application. Mix into the soil to a depth of 4-8 inches.

SWEET POTATOES (North Carolina Only): WIREWORMS—Apply 11 oz. per 500 sq. ft. over the top of sweet potato plant foliage when roots begin to enlarge.

TOMATOES: VINEGAR FLIES (Drosophila spp.)—Apply 4 oz. per 500 sq. ft. over top of plants when flies first appear. Repeat at 7-10 intervals or as required. Tomatoes may be picked the same day.

TURNIPS: ROOT MAGGOTS—Apply 4 oz. per 500 sq. ft. in seed furrow at planting time.

NOTE

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

SPREADER SETTING NO. (per 1000 sq. ft.)

Spreader Make & Model	Insects listed Below*		White Grubs Billbugs
	Grass or Dichondra Lawn 2 lbs	St Augustine Lawn 3 lbs	2 1/2 lbs
Central Imperial Mark No 1662-G	6%	7%	7
Central Suburban Lawn Spreader No 1622-0	6%	7%	7
Cyclone Model B 1 Rotary	4%	5	4%
Greenfield Model 105	6%	7%	6%
Oring Drop Spreader Model 3000	4%	5%	5
Oring Broadcast Spreader Model 4000	4%	7	6
J C Penney Model 6005	7%	8	7%
J C Penney Rotary Spreader	5	7	6
Scott Model 35	4	5	4%
Sears Craftsman Model 671 19198	6	7	6%

*Ants
Armyworms
Bermudagrass Mites
Brown Dog Ticks
Chiggers
Chinch Bugs
Clover Mites
Crickets
Cutworms
Earwigs

Hyperodes Weevil
(New York Only)
Lawn Moths
(Sod Webworms)
Leafhoppers
Millipedes
Sowbugs
Springtails
(Collembola)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Store pesticide in original container and place in a locked storage area. Do not reuse container. Securely wrap original container in several layers of newspaper and discard in trash.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.