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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 22 2005
OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg
GRO-PRO LLC
c/o Pyxis Regulatory Consulting, Inc.
11324 17th Ave. Ct. NW
Gig Harbor, WA 98332

Subject: Alternate Confidential Statements of Formula
Label Amendment: Revision of PPE per Toxicology Review
Chlorpyrifos G-PRO 2.32% Granules
Alternate CSFs dated May 25, 2005 for EPA Reg. No. 79676-5, acceptable.
Submission dated June 2, 2005

Dear Mr. Kellogg:

The Agency reviewed the product chemistry and product toxicology data in support of your new Alternate Confidential Statements of Formula numbers 1, 2,3,4 and 5 all dated May 25, 2005 and the following comments apply:

The Confidential Statements of Formula listed above have been accepted provided that you submit acceptable Storage Stability (830.6317) and Corrosion Characteristics (830.6320) data, within one year from the date of this letter, to support your new formulations.

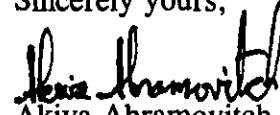
The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comment:

- 1) The recommended Precautionary Statements from the Toxicology Review are as follows:
Causes moderate eye irritation. Avoid contact with eyes and clothing. Harmful if swallowed.
- 2) The wording for the User Safety Recommendations is as follows:
Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

A stamped copy "accepted with comments" of the label is enclosed for your records. Please submit two (2) copies of the final printed before shipment. If you have any questions please call me at (703) 308-8328.

2 8 7

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Akiva Abramovitch', written over the printed name.

Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch

Registration Division (7505C)

3 8 7

Chlorpyrifos G-Pro 2.32% Granules

For effective long lasting control of Chinch Bugs, Asian Roaches, Fire Ants, Fleas, Ticks, Foraging Ants, Mole Crickets and other outdoor insects.

ACTIVE INGREDIENT:

Chlorpyrifos (O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) phosphorothioate)..... 2.32%

OTHER INGREDIENTS:..... 97.68%

TOTAL..... 100.00%

ACCEPTED

with COMMENTS

In EPA Letter Dated:

NOV 22 2005

KEEP OUT OF REACH OF CHILDREN

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

CAUTION

FIRST AID Organophosphate

If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately 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 person.
If in eyes:	<ul style="list-style-type: none">• 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.
If on skin or clothing:	<ul style="list-style-type: none">• 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 inhaled:	<ul style="list-style-type: none">• 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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.

NOTE TO PHYSICIAN

Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate degree of exposure (baseline data are useful). Atropine, only by injection, is the preferable antidote. Oximes, such as 2-PAM/protopam, may be therapeutic if used early; however, use only in conjunction with atropine. In case of severe acute poisoning, use antidotes immediately after establishing an open airway and respiration.

See inside label booklet for additional PRECAUTIONARY STATEMENTS

EPA Reg. No. 79676-5

EPA Est. No.

Manufactured for:
Gro-Pro, LLC
2214 Hwy 44 West
Inverness, FL 34453

Chlorpyrifos G-Pro 2.32% Granules
contains chlorpyrifos, the active
ingredient used in Dursban®.

Net Weight: 50 lbs.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing dust.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Loaders, applicators and all other handlers must wear:

- long-sleeved shirt and long pants;
- socks and shoes.

In addition to the above, loaders must wear:

- chemical-resistant gloves such as natural rubber \geq 14 mils;
- chemical-resistant apron;
- a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any N, R, P, or HE filter.

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.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 birds, fish, and aquatic invertebrates. Birds feeding in treated areas may be killed. Clean up spilled product to reduce exposure to wildlife. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

The maximum application rate of Chlorpyrifos G-Pro 2.32% Granules for all applications on this label is 1 lb. a.i./A.

Do not enter or allow others to enter until dusts have settled.

Chlorpyrifos G-Pro 2.32% Granules may be used for mound treatment control of imported fire ants⁽⁷⁾. Chlorpyrifos G-Pro 2.32% Granules also controls: Ants (including Carpenter, Argentine and Foraging), Armyworms (Beet, Fall, Yellowstriped), Centipedes, Chinch Bugs⁽²⁾, Clover Mites, Cutworms, Crickets, Earwigs, Fiery Skipper, Fleas, Grasshoppers, Greenbugs, Leafhoppers, Millipedes, Mole Crickets⁽⁴⁾, Roaches (Asian), Sod Webworms (Lawn Moth)⁽³⁾, Sow Bugs, Springtails, Ticks (Brown Dog Tick)⁽¹⁾, Turfgrass Weevil (Hyperodes), White Grubs, European Crane Fly, Southern Chafer, Japanese Beetle, and June Beetle (Larvae)⁽⁵⁾, Bluegrass Billbugs⁽⁶⁾. (Refer to the numbered paragraphs in the SPECIFIC DIRECTIONS section of this label for specific insect control application information).

1 lb. of Chlorpyrifos G-Pro 2.32% Granules treats up to 1,000 sq. ft.

SPECIFIC DIRECTIONS

The following numbered paragraphs correspond to numbers in parenthesis () from the list of insects in the DIRECTIONS FOR USE section above. Insects not numbered may be controlled by following the GENERAL DIRECTIONS section of this label. Repeat treatments as needed for control.

(1) Brown Dog Ticks & Fleas

Use 0.5 lb./500 sq. ft. (1.0 lb./1,000 sq. ft.) for area control of these insects infesting golf course turf, road medians, and exterior areas of industrial plant sites. DO NOT allow public use of treated area during applications.

(2) Chinch Bugs

Apply $\frac{3}{4}$ lb. Chlorpyrifos G-Pro 2.32% Granules per 750 to 1,000 sq. ft. (40 to 43 lbs. per acre) when insects appear and/or their damage is imminent. To prevent damage, apply as soon as daily temperatures reach 80°F and repeat every 2 months. Use the lower rate as a preventative treatment or for light infestation. Use the higher rate when insects are present in large numbers and turf is being damaged.

(3) Sod Webworms

For sod webworms, apply Chlorpyrifos G-Pro 2.32% Granules at the rate of 40 lbs. per acre. Delay watering or mowing the treated area for 12 to 24 hours after treatment. Treat in the spring or when insects first appear troublesome. Additional treatments at 30-day intervals may be needed for new infestations.

(4) Mole Crickets

Use 40 lbs. of Chlorpyrifos G-Pro 2.32% Granules per acre. Treat suspected problem areas when insects become a problem or as recommended by your local Agricultural Extension Service Specialist.

The best time to control Adult Mole Crickets:

March to August – egg-laying time

February to September – best time to control crickets

(5) White Grubs; Crane Fly Larvae

To control White Grubs, Black Turfgrass Ataenius, European Crane Fly, Southern Masked Chafer, Japanese Beetle and June Beetle (larvae): Use 40 lbs. Chlorpyrifos G-Pro 2.32% Granules per acre. Apply enough water to thoroughly wash the insecticide into the turf to improve efficacy. For best results, remove thatch first and treat when grubs are young and actively feeding near the soil surface, usually during late July and August. Consult your local Agricultural Extension Service Specialist for best time to treat.

European Crane Fly larvae will be controlled using 1.0 lb Chlorpyrifos G-Pro 2.32% Granules per 1,000 sq. ft. or will be controlled simultaneously with the same application being applied for control of White Grubs. Consult your local Agricultural Extension Service Specialist for best time to apply. For best results, first remove thatch. Water the granules into the soil.

(6) Bluegrass Billbugs

Use 35 lbs. Chlorpyrifos G-Pro 2.32% Granules per acre. To improve control, apply enough water to wash granules into the soil where insects are feeding.

(7) Imported Fire Ant Control

Mound Treatment – For treatment of Fire Ant mounds. For Professional Use Only. Treat individual ant mounds measuring from 3 to 12 inches in diameter by applying $\frac{1}{2}$ tablespoon of granules evenly in a circle around the outer edges (1 to 2 feet from the center) of the mound. Finish the treatment by applying 1 tablespoon of granules sprinkled evenly over the center of the mound. After granule application, gently sprinkle the treated area with a minimum of 1 quart of water per 6 inches of mound diameter. Apply in cool weather (65° to 80°F) or in early morning or late evening. Best results will be obtained if mound is

not disturbed after treatment thus allowing ants to come and go and to be exposed to the insecticide. Repeat treatments as needed for additional control but not more than once every 7 days.

GENERAL DIRECTIONS FOR USE ON GOLF COURSE TURF ONLY

Apply Chlorpyrifos G-Pro 2.32% Granules uniformly to golf course turf using any hand or power operated type spreader designed for application of granules. Treat at the rate of 1.0 lb/1,000 sq. ft. (43 lbs. Chlorpyrifos G-Pro 2.32% Granules per acre) when surface insects first appear. Increase this rate as indicated for control of certain soil insects under the SPECIFIC DIRECTIONS section of this label. For best efficacy, sprinkle the turf with water to move the granules into the zone of insect infestation. Repeat treatment as necessary. Observe the watering limitation described in (3) Sod Webworms in the SPECIFIC DIRECTIONS section of this label.

RATE TO USE FOR SURFACE INSECTS

For control of Ants (including Carpenter, Argentine and Foraging), Armyworms (Beet, Fall, Yellowstriped), Centipedes, Chinch Bugs, Clover Mites, Cutworms, Crickets, Earwigs, Fiery Skipper, Fleas, Grasshoppers, Greenbugs, Leafhoppers, Millipedes, Sod Webworms (Lawn Moth), Sowbugs, Springtails, and Ticks (Brown Dog Tick) – use 1.0 lb./1,000 sq. ft.

FOR SOIL FEEDING INSECTS

Refer to the SPECIFIC DIRECTIONS section of this label (paragraphs (3), (4), and (5)) for rates to control the listed turf insects that feed below the soil surface. When using a spreader, calibrate with each application by accurately weighing a few pounds into the spreader and apply to a measured area. Adjust spreader setting in order to ensure the correct rate of application.

NOTE: The age, condition of spreader and operator speed can cause a wide variation of rates.

PERIMETER TREATMENT AROUND BUILDINGS AT INDUSTRIAL PLANT SITES (SUCH AS AROUND WAREHOUSES, FOOD PROCESSING AND FOOD MANUFACTURING SITES) – USE FOR CRAWLING INSECT CONTROL

Use Chlorpyrifos G-Pro 2.32% Granules to protect against insects entering indoors. Place a band of granules around the outside of the building to kill Ants (including Carpenter, Argentine and Foraging), Ticks (Brown Dog Tick), Crickets, Earwigs, Fleas, Millipedes, Roaches (Asian), Sowbugs, and Springtails before they attempt to enter. Use 0.5 lb. Chlorpyrifos G-Pro 2.32% Granules to treat 500 sq. ft. (as a band 5 ft. x 80 ft. long) around the structure. Apply when insects have become troublesome or before they cause problems in the spring or early fall. Repeat one month later and then as needed for control but not more than once every 7 days. Keep the public (especially children and pets) off treated areas until the granules are sprinkled in and the area is dry.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in a cool, dry locked place out of the reach of children.

PESTICIDE 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, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely 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.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Gro-Pro LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Gro-Pro LLC and Seller harmless for any claims relating to such factors.

Gro-Pro LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Gro-Pro LLC, and Buyer and User assume the risk of any such use. **GRO-PRO LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

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