

79676-6

11/18/2005

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

NOV 18 2005

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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

**Subject:** Alternate Confidential Statements of Formula  
**Label Amendment:** Revision of PPE per Toxicology review  
Chlorpyrifos G -PRO 1% Mole Cricket Bait  
Alternate CSFs dated May 31, 2005 for EPA Reg. No. 79676-6, **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 31, 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.

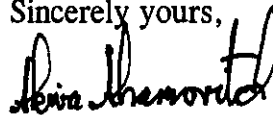
The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comments:

- 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.

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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)

# Chlorpyrifos G-Pro 1% Mole Cricket Bait

A Ready to Use Insecticidal Bait for Application to the Soil Surface of Golf Course Turf and Sod  
Farm Turf Only

For Control of Mole Crickets which may Feed upon this Insecticidal Bait

## ACTIVE INGREDIENT:

Chlorpyrifos (O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) phosphorothioate)..... 1.00%

OTHER INGREDIENTS: ..... 99.00%

TOTAL ACCEPTED..... 100.00%

with COMMENTS

In EPA Letter Dated:

NOV 18 2005

KEEP OUT OF REACH OF CHILDREN

## CAUTION

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
79676-6

### FIRST AID Organophosphate

If swallowed:	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If in eyes:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If on skin or clothing:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If inhaled:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>

### 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. 79676-6

EPA Est. No.

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

Chlorpyrifos G-Pro 1% Mole Cricket  
Bait 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 skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing dust.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Some materials that are chemical-resistant to this product are natural rubber  $\geq 14$  mils. For more information, follow instructions in Supplement Three of PR Notice 93-7. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

Loaders, applicators and all other handlers must wear:

- coveralls over long-sleeved shirt and long pants;
- chemical-resistant gloves;
- chemical-resistant footwear plus socks;
- a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21-C 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.

**ENGINEERING CONTROLS**

When applicators use closed cab equipment in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**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 fish, aquatic invertebrates, small mammals and birds. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

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.

**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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests,

nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours.

PPE required for early entry to treated areas (that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water), is:

- Coveralls over short sleeved shirt and short pants;
- Chemical-resistant gloves made out of any waterproof material;
- Chemical-resistant footwear plus socks;
- Chemical-resistant headgear for overhead exposures

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

#### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides [40 CFR Part 170]. The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

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

For golf course turf applications, the maximum application rate per application is 1 lb. a.i./A.

For Control of Mole Crickets in Golf Course Turf and Sod Farm Turf Only - Apply Chlorpyrifos G-Pro 1% Mole Cricket Bait at the rate of 100 pounds per acre or 2 ¼ pounds per 1,000 sq. ft. Spread evenly over the area using a mechanical spreader. Make applications in late afternoon on moist soil in areas known to be infested with these insects. Repeat application in about one week for best control.

The best time to control the Southern Mole Cricket:

March through August – egg laying time

February through September – adult mole crickets

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in original container in a cool, dry place.

**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.

In no event shall Gro-Pro LLC or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF GRO-PRO LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF GRO-PRO LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Gro-Pro LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Gro-Pro LLC.

Chlorpyrifos G-Pro 1% Mole Cricket Bait is not manufactured or distributed by Dow AgroSciences, seller of Dursban®.

Dursban® is a registered trademark of Dow AgroSciences LLC.

