

79676-7

11/21/2005

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

NOV 21 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 0.5% Mole Cricket Bait
Alternate CSFs dated May 31, 2005 for EPA Reg. No. 79676-7, 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.

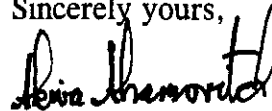
The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comments:

- 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,



Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch

Registration Division (7505C)

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Chlorpyrifos G-Pro 0.5% Mole Cricket Bait

ACTIVE INGREDIENT:

Chlorpyrifos (O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) phosphorothioate)..... 0.5%

OTHER INGREDIENTS:..... 99.5%

TOTAL ACCEPTED..... 100.0%

with COMMENTS

In EPA Letter Dated:

NOV 21 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.

79676-7

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. 79676-7

EPA Est. No.

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

Net Weight: 50 lbs.

Chlorpyrifos G-Pro 0.5% Mole Cricket Bait contains chlorpyrifos, the active ingredient used in Dursban®.

**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 extremely toxic to fish, birds, and other 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. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Cover or incorporate spills. Do not contaminate water when 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 per application of Chlorpyrifos G-Pro 0.5% Mole Cricket Bait is 1 lb. ai/A.

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

Use Chlorpyrifos G-Pro 0.5% Mole Cricket Bait for control of chinch bugs, sod webworms (lawn moths), ants, brown dog ticks, field crickets, mole crickets, cutworms, earwigs, sowbugs (pillbugs), certain white grubs* and hyperodes (turfgrass) weevils** infesting golf course turf and ornamental turf, on road medians, and industrial plant sites.

NOT FOR USE IN RESIDENTIAL AREAS.

Apply Chlorpyrifos G-Pro 0.5% Mole Cricket Bait uniformly to golf course turfgrass, road medians and industrial plant sites using any hand or power operated gravity or rotary type spreader designed for

application of granular materials. Treat when insects first appear using Chlorpyrifos G-Pro 0.5% Mole Cricket Bait at the rate of 200 pounds per acre. Apply ½ the required amount of product in one direction; then apply the balance at a right angle to the original application to aid in uniform distribution of the product.

For control of chinch bugs, cutworms, earwigs, sod webworms (lawn moths), sowbugs (pillbugs), certain white grubs* and hyperodes (turfgrass) weevils**, immediately after application, sprinkle the turf with 1300 gallons of water per acre to wash the granules into the zone of insect infestation. Refer to the following table to determine the amount of Chlorpyrifos G-Pro 0.5% Mole Cricket Bait and water needed for smaller sized areas. Repeat as necessary.

RATES TO USE		
Area to be Treated	Pounds of Chlorpyrifos G-Pro 0.5% Mole Cricket Bait	Gallons of Water to Sprinkle on Turf***
1,000 sq. ft.	4.5	30
5,000 sq. ft.	22.5	150
10,700 sq. ft.	48	325

*To control certain white grubs (larvae of European chafer and Japanese beetle) use two to four times the amounts of Chlorpyrifos G-Pro 0.5% Mole Cricket Bait shown in the table, i.e., 2 to 4.5 pounds per 1,000 sq. ft. Apply the granules uniformly over the area to be treated followed immediately by thorough watering to wash the insecticide into the turf. For best results, 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 proper time to treat in your area.

**To control hyperodes (turfgrass) weevils, use twice the rate of Chlorpyrifos G-Pro 0.5% Mole Cricket Bait shown in the table. Treat suspected problem areas in mid-April and again in mid-May. Consult your local Agricultural Extension Service specialist for best time to treat in your area.

***Water in bait for control of chinch bugs, sod webworms (lawn moths), cutworms, earwigs, sowbugs (pillbugs), certain white grubs, and hyperodes weevils.

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.

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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 0.5% Mole Cricket Bait is not manufactured or distributed by Dow AgroSciences, seller of Dursban®.

Dursban® is a registered trademark of Dow AgroSciences LLC.