09/25/2003



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

SEP 25 2003

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Rebecca M. Horton Consultant and Agent for Bonide Products Inc. 913 Dominion Lane Salem, Virginia 24153-5630

Subject: Label Amendment: 2001-1 First Aid and Storage and Disposal Slug, Snail & Sowbug Bait (Carbaryl Insecticide) EPA Reg. No. 4-333 Submission dated June 25, 2003

Dear Ms. Horton:

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

1) Add "For Residential Use only" under the product name.

2) Revise the Precautionary Statements to read "Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

3) The Note to Physician should be updated to read "Contains N-methyl carbamate insecticide which is a cholinesterase inhibitor. Specific antidote consists of atropine. Narcotics and other sedatives should not be used. Drugs like 2-PAM (pyridine-2-aldoxime methiodide) are NOT recommended." You may want to list the NPIC emergency number below the First Aid statement. You may want a separate Note to Veterinarian from the Note to Physician.

4) You should explain the term PHI for use by non professionals.

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.

Sincerely yours.

Akiva Abramovitch, Ph.D. Insecticide-Rodenticide Branch Registration Division (7505C)



SLUG, SNAIL & SOWBUG BAIT

[Additional Brand Name: No Escape Slug, Snail & Sowbug Bait]

Optional Marketing Statements: CAN BE USED AROUND VEGETABLE GARDENS THIS EXCEPTIONAL APPLE PUMACE BAIT WILL ATTRACT AND KILL SLUGS, SNAILS, ANTS, EARWIGS, CUTWORMS, SOWBUGS, MILLIPEDES, CRICKETS, GRASSHOPPERS, ARMYWORMS AND CHINCH BUGS AROUND FLOWERS, SHRUBS, LAWNS, AND CERTAIN LISTED VEGETABLES. READ ENTIRE LABEL BEFORE USE.

ACTIVE INGREDIENTS

Carbaryl (CAS # 63-25-2)	
Methaldehyde (CAS # 108-62-3)	
OTHER INGREDIENTS:	
TOTAL	
	ACCEPTED

with COMMENTS In EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN SEP 25 2003

CAUTION

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

This pesticide may be fatal to dogs or other pets if eaten. Keep pets out of treated area. Read and follow all directions. See back/side/other panel(s) for additional precautionary statements.

NET WEIGHT:

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	FIRST AID
Have the produ	et container or label with you when calling a poison control center or doctor, or
going for treatn	nent. You may also contact the National Pesticide Telecommunications
Network at 1-8	00-858-7378 for emergency medical treatment information.
lf	• Call a poison control center or doctor immediately for treatment advice.
Swallowed:	• 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
1	or doctor.
	• Do not give anything by mouth to an unconscious person.
lf on Skin or	Take off contaminated clothing.
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 eye.
	Call a poison control center or doctor for treatment advice.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid breathing dust. Avoid contact with skin, eyes, or clothing.

USER SAFETY REQUIREMENTS

Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when applying this product. Change clothing as soon as possible after use. Wash the outside of gloves before removing. As with any pesticide product, wash hands thoroughly immediately after handling and before eating, smoking or using the toilet. Do not allow children or pets to contact treated area until dust has settled. **IMPORTANT:** Keep away from children, dogs, and pets. Bait may be attractive to dogs. Confine pets during application to prevent them from believing they are being fed. Use and store under conditions where there will not be a hazard.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic and estuarine invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

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. This pesticide may be fatal to dogs or other pets if eaten. Keep pets out of treated area.

DIRECTIONS FOR USE

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

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STORAGE AND DISPOSAL

Storage: Store and transport in an upright position. Store in a cool dry area inaccessible to children or pets.

Disposal: If empty – Do not reuse this container. Place in trash or offer for recycling if available. If partly filled – Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Wearing household latex or rubber gloves, apply bait with a shaker can or broadcast bait as appropriate. Apply a thin even layer of bait to application area.

Apply when air is calm to avoid drift and contact with eyes and skin.

Start applying at the farthest corner of the treatment area and work backward to avoid contact with treated surfaces. Allow dust to settle in treated areas before reentering.

Do not repeat application more than once a week.

- KILLS: Slugs, Snails, Ants, Earwigs, Cutworms, Armyworms, Sowbugs, Millipedes, Crickets, Mole Crickets, Grasshoppers.
- **PROTECTS:** Flowers, Ornamentals, Shrubs, Lawns and certain listed vegetables. Remains effective after rain or sprinkling.

HOW TO USE: Be sure area to be baited is damp. In dry weather, water area well before baiting. Apply bait in evening or at night as these pests feed mainly at night. Until under control, bait should be renewed every two weeks or more often for heavy infestations. Slugs and snails favor dark, damp places. Bait especially well shaded areas around flowers, shrubs, rockeries, and other ornamentals where these pests stay during daylight hours. Slugs, snails and the listed insects are attracted to the bait. Place bait upwind to the infestation for best results. Upwind is the direction from which the wind is blowing from bait toward pests.

Slugs, snails and the listed insects travel or migrate extensively. When invasions from adjacent areas are a probability, a lightly applied band of bait the entire length of the infested area will provide a barrier and aid in control.

FLOWERS, ORNAMENTALS, SHRUBS, GROUND COVERS: To kill slugs, snails, armyworms, earwigs, sowbugs, millipedes, crickets, chinch bugs and grasshoppers, broadcast the bait lightly over the infested area using 1 pound per 250 square feet.

DICHONDRA LAWNS, TURF LAWNS: To kill slugs, snails, and mole crickets, water infested areas thoroughly. Broadcast directly on lawn or turf. Do not water treated areas for 48 hours. Use 1 pound to cover 1,500 sq. ft. of infested area.

VEGETABLES: To kill slugs, snails, armyworms, cutworms, earwigs, sowbugs, crickets, mole crickets, and grasshoppers, broadcast lightly on soil surface around plants, using rates in chart

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Crop	Days between final application and harvest	
Asparagus	Application to spears: Maximum single application rate of .9 lb./	1,000 sq.
	ft. application with a maximum seasonal application rate of 2.7 lb	s./1,000
	sq. ft./crop.	
	Application to ferns: (after harvest of spears): Maximum single a	pplication
	rate of .9 lb./1,000 sq. ft./application with a maximum seasonal ra	
	lbs./1,000 sq. ft./crop.	
	Retreatment Interval = 7 days when applied to ferns after harvest.	
	Retreatment Interval = 3 days when applications are to spears.	
	$\mathbf{PHI} = 1 \text{ day.}$	
	The total maximum seasonal application rate for spears and ferns	is 4 5 lhs /
	1,000 sq. ft./crop.	10 110 1000
	The total number of applications is 3 prior to harvest with 2 additional addi	onal
	applications to ferns only.	
Beans, fresh and	Maximum single application rate of .65 lb./1,000 sq. ft./application	n with a
dried (snap, navy,	maximum seasonal application rate of 2.7 lbs./1,000 sq. ft./crop.	n will a
and kidney); pea,	Retreatment Interval = 7 days.	
fresh and dried;	$\mathbf{PHI} = 3 \text{ days (succulents).}$	
cowpea, lentil		
cowpea, ientii	PHI = 21 days (dried).	
	PHI = 14 days (forage).	
Garden beets	PHI = 21 days (hay).	with a
	Maximum single application rate of .9 lb./1,000 sq. ft./application	with a
(roots), carrots,	maximum seasonal application rate of 2.7 lbs./1,000 sq. ft./crop.	
horseradish,	Retreatment Interval = 7 days.	
radish, parsnip,	PHI = 7 days.	. 1
rutabaga, salisfy,	Total number of applications can be 6 (some of which must be at	a lower
turnips (roots)	than maximum single application rate).	*.1
Brussel sprouts,	Maximum single application rate of .9 lb./1,000 sq. ft./application	with a
broccoli, cabbage,	maximum seasonal application rate of 2.7 lbs./1,000 sq. ft./crop.	
cauliflower,	Retreatment Interval = 7 days.	
Chinese cabbage,	PHI = 3 days (Brussel sprouts, broccoli, cabbage, kohlrabi, caulif	ower).
collards, kale,	PHI = 14 days (Chinese cabbage, kale, collards).	
kohlrabi	Total number of applications can be 4 (some of which must be at	a lower
	than maximum single application rate).	
Corn (field and	Maximum single application rate of .9 lb./1,000 sq. ft./application	with å
pop)	maximum seasonal application rate of 3.6 lbs./1,000 sq. ft./crop.	
	Retreatment Interval = 14 days.	
	PHI = 14 days (forage, silage).	
	PHI = 48 days (grain, fodder).	* *
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Corn (sweet)	Maximum single application rate of .9 lb./1,000 sq. ft./application with a maximum seasonal application rate of 7.3 lbs./1,000 sq. ft./crop. Retreatment Interval = 3 days. PHI = 2 days (ears). PHI = 14 days (forage). PHI = 48 days (fodder).
Lettuce (head and leaf), endive, celery, dandelion, parsley, spinach, Swiss chard, Hanover salad, rhubarb, garden beets (tops), turnips (tops)	Maximum single application rate of .9 lb./1,000 sq. ft./application with a maximum seasonal application rate of 2.75 lbs./1,000 sq. ft./crop. Retreatment Interval = 7 days. PHI = 14 - 15 days. Total number of applications/crop can be 5 (some of which must be at a lower than maximum single application rate).
Potato	 Maximum single application rate of .9 lb./1,000 sq. ft./application with a maximum seasonal application rate of 2.7 lbs./1,000 sq. ft./crop. Retreatment Interval = 7 days. PHI = 7 days. Total number of applications can be 6 (some of which must be at a lower than maximum single application rate).
Strawberry	Maximum single application rate of .9 lb./1,000 sq. ft./application with a maximum seasonal application rate of 4.5 lbs./1,000 sq. ft./crop. Retreatment Interval = 7 days. PHI = 7 days.
Tomato, p epper, eggplant	Maximum single application rate of .9 lb./1,000 sq. ft./application with a maximum seasonal application rate of 3.6 lbs./1,000 sq. ft./crop. Retreatment Interval = 7 days. PHI = 3 days. Total number of applications/crop can be 7 (some of which must be at a lower than maximum single application rate).

For information on pesticide products (including health concerns, medical emergencies, or pesticide incidents, call the National Pesticide Telecommunications Network at 1-800-858-7378.

The buyer must assume all responsibility for use of this product when not used in strict accordance with directions or established safe practice, or when used under abnormal conditions not reasonably foreseeable to the seller.

Manufactured by

Bonide Products, Inc.

Oriskany, NY 13424

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