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APR 16 1997

Gene R. Currie
Imperial Inc.
1280 Imperial Road/Box 536
Hampton, IA 50441

Subject: Imperial Sevin® brand carbaryl insecticide Dust
EPA Registration No. 407-281
Amendment dated December 30, 1996
Response to Agency letter dated 10/1/96

Dear Mr. Currie:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Make the following changes to your label:

- a) Because this product is intended for commercial agricultural and residential use, change the heading of the USER SAFETY REQUIREMENTS box to RESIDENTIAL USER SAFETY REQUIREMENTS to avoid confusion with the requirements of the Worker Protection Standard.
- b) In the Directions for Use on CORN, change "...apply at 2 to 3 day intervals..." to "...apply at 7 day intervals..."
- c) In the Directions for Use on GRASSHOPPERS, change the sentence "Apply as often as necessary to control grasshoppers on the above crops" to "Apply as often as necessary to control grasshoppers on the above crops but not more than once a week."

2. Submit one copy of your final printed labeling before you release the product for shipment.

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



Dennis H. Edwards, Jr.
Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

IMPERIAL
SEVIN®
brand carbaryl insecticide
DUST
N-Methyl Carbamate

FOR THE CONTROL OF CERTAIN INSECTS ON
VEGETABLES, SMALL FRUITS AND PETS

ACTIVE INGREDIENT :

Carbaryl (1-naphthyl N-methylcarbamate).....	5%
INERT INGREDIENTS	95%
Total.....	100%

®SEVIN is a registered trademark of Rhone-Poulenc for carbaryl insecticide

KEEP OUT OF REACH OF CHILDREN
CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY
STATEMENTS

EPA Reg. No. 407-281 J-96WPS OCT. 1 LETTER
EPA Est. 407-1A-1

NET CONTENTS 1 POUND

Manufactured by Imperial Inc. Shenandoah, Iowa 51601

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin, or clothing. Avoid contamination of feed and foodstuffs.

NOTE TO PHYSICIAN: Carbaryl is a moderate, reversible, cholinesterase inhibitor. Atropine is antidotal. Personal Protective Equipment :

- Applicators and other handlers must wear:
- Long-sleeved shirt and long pants .
 - Waterproof gloves .
 - Shoes plus socks .

Follow manufacturer's instructions for cleaning or maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to aquatic and estuarine invertebrates. For terrestrial uses, 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 by cleaning of equipment or disposal of waste. 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 .

USER SAFETY REQUIREMENTS

Users should:
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 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.

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) and restricted-entry interval . The requirements in this box apply only 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 12 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.
- Waterproof gloves.....
- Shoes plus socks.

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 treated areas without protective clothing until dusts have settled.

STORAGE AND DISPOSAL

STORAGE: Store in original container, in a cool, dry, secure area away from fertilizer, food, or feed. Keep container closed.

PRODUCT DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash .

CONTAINER DISPOSAL: Do not reuse empty container. Wrap container and put in trash .

See page 2 for accepted w/ ~~the~~ comments stamped label

Apply Sevin® Dust when insects or their damage appear. Wearing household latex or rubber gloves, use a dust applicator such as a shaker can, dust gun, puffer or other bulbous duster, rotary duster or other appropriate duster as available. Dust lightly to cover both upper and lower leaf surfaces with a thin, even film. 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 dusted surfaces. Allow dust to settle in treated areas before reentering. For plants above chest height, consider using a liquid carbaryl product. Do not repeat application more than once a week. Make application in the morning or evening when it is cool.

VEGETABLE INSECT CONTROL

May be used up to day of harvest on the following:

BEANS (green beans, lima beans, snap beans, black-eyed peas) - Mexican bean beetle, leafhopper, cucumber beetle, Japanese beetle.

CORN - corn rootworm adults, European corn borer, fall armyworm, corn earworm. For corn borers, apply thoroughly into the whorls when plant is about knee high. Repeat at weekly intervals until control is achieved. For insects attacking silks and ears, apply at 2 to 3 day intervals starting when first silks appear and continuing until silks begin to dry. Three or more applications may be required depending on severity of infestation. Timing and good coverage are essential for effective control. Application of this product to the tassel region of corn during the pollen shed period will seriously reduce bee populations.

CARROTS - flea beetle, leafhopper, harlequin bug.

CUCUMBER, SUMMER and WINTER SQUASH, MELONS, PUMPKINS - pickleworm, melonworm, cucumber beetle, squash bug, flea beetle, leafhopper. Avoid excessive applications. Some leaf injury may occur if treatments are made when tender foliage is wet or in the presence of prolonged high humidity.

OKRA - corn earworm, stink bug.

POTATO (apply as foliage application only), **TOMATO, EGGPLANT, PEPPER** - Colorado potato beetle, flea beetle, leafhopper, European corn borer, fall armyworm, lace bugs, tomato fruit worm, tomato hornworm, tarnished plant bugs, stink bugs.

Do not apply within 3 days of harvest on the following:

GARDEN BEETS, TURNIPS, SALSIFY, COWPEAS (do not apply within 14 days of harvest if tops are to be used as food or feed).

BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CAULIFLOWER, KOHLRABI - flea beetle, harlequin bug, armyworm, cabbage caterpillar, corn earworm.

PARSNIPS, RADISHES, RUTABAGAS - flea beetle, leafhopper.

Do not apply within 14 days of harvest on the following:

LETTUCE (LEAF), SPINACH, SWISS CHARD, CHINESE CABBAGE, COLLARDS, ENDIVE (ESCAROLE), KALE, MUSTARD GREENS, PARSLEY - armyworm, flea beetle, leafhopper, cabbage caterpillar.

GRASSHOPPERS ON THE ABOVE CROPS: Apply as often as necessary to control grasshoppers on the above crops. See appropriate crop limitations.

SMALL FRUIT INSECT CONTROL

Use sufficient dust to obtain full coverage. Apply when insects or their damage appear. Repeat at 7 to 10 day intervals or as necessary.

GRAPES - grape leaf folder, grape leafhopper, and grape leaf skeletonizer. Apply just before first broad leaf folder larvae emerge from rolls and as needed for leafhoppers. May be applied up to day of harvest.

STRAWBERRIES - meadow spittlebug, strawberry leaf roller and strawberry weevil. May be used up to 1 day before picking.

BLUEBERRIES - blueberry maggot, cherry and cranberry fruitworm and Japanese beetles. Apply 3 weeks before harvest and repeat 10 days later or as necessary. May be applied up to day of harvest. Do not use more than 3 lbs. per acre.

BLACKBERRIES, BOYSENBERRIES, LOGANBERRIES AND RASPBERRIES - Japanese beetle, leaf roller, leafhopper, and raspberry aphid. Do not apply within 7 days of harvest.

NOTICE

Buyer assumes all risk of use, storage or handling of this product when not in strict accordance with directions given herewith.

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 16 1997

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

407-281

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