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

FEB 5 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Thomas C. McEntee  
VP Regulatory Compliance  
Dragon Chemical Corporation.  
71 Carolyn Blvd  
Farmingdale, NY 11735

**Subject:** Label Amendment: First Aid, Storage & Disposal  
Blue Dragon Garden Dust  
EPA Reg. No. 16-12  
Submission dated August 14, 2003, **acceptable with comments.**

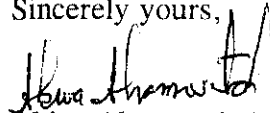
Dear Mr. McEntee:

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) Revise the Precautionary Statements to read "**Harmful if swallowed, inhaled or absorbed through the skin.** Avoid breathing dust. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash thoroughly before reuse".
- 2) The Note to Physician should be updated to read "Carbaryl is an 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.
- 3) Revise the re-treatment directions to "Do not reapply this product less than 30 days from the last application" to comply with the 30 days prohibition of re-treating pets with cholinesterase inhibiting pesticides.
- 4) Add in the Directions for use on pets to "This product should not applied by children" "This product must not be applied by children or when children are present".
- 5) Correct spelling of (Freash) fresh in fresh beans under Beans.

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.

Chemist

Insecticide-Rodenticide Branch  
Registration Division (7505C)

**BLUE DRAGON GARDEN DUST**

Kills: Japanese Beetles, Mexican Bean Beetles, Flea Beetles, Tomato Hornworm, and Certain Other Listed Insects

**ACTIVE INGREDIENT:**

Carbaryl (1-naphthyl N-methylcarbamate) ..... 2%

**INERT INGREDIENTS:** ..... 98%

**TOTAL**.....100%

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
FEB 5 2004**

**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.**

16-12

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL CAUTIONS  
WARNINGS AND DIRECTIONS; AND IN CONFORMITY  
WITH FEDERAL AND STATE REGULATIONS.

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**CAUTION:** May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. DO NOT take internally.

**KEEP OUT OF REACH OF CHILDREN AND ANIMALS.** Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. However, flea and tick collars may be immediately replaced.

**USER SAFETY REQUIRMENTS**

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.

**FIRST AID**

FOR A MEDICAL EMERGENCY INVOLVING THIS PRODUCT CALL:  
CHEMTREC AT: 1-800-424-9300

**IF INHALED:**

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.

**IF ON SKIN OR CLOTHING**

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15 to 20 minutes.

Call a poison control center or doctor for further treatment advice.

**IF IN EYES**

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.

Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED**

Call 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.

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 - 222- 1222 for emergency medical treatment information.*

**Note to Physician & Veterinarian:** Carbaryl is a moderate, reversible cholinesterase inhibitor. Atropine is antidotal.

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic and estuarine invertebrates. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. 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.

**[version a text "lined out" format]****DIRECTIONS FOR USE**

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

**FOR HOMEOWNER USE ONLY.** Blue DRAGON® Garden Dust controls insects which attack vegetables, flowers, shrubs and trees. Apply when insects first appear before damage from feeding occurs. 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 upper and lower leaf surfaces with a thin, even film of dust. 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. Do not repeat application more than once a week. Do not use with lime or other alkaline materials. Blue Dragon Garden Dust may be applied up to harvest except where noted. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

The number in parentheses ( ) following each vegetable grouping refers to the minimum number of days that must be observed between the date of the last application and the date of harvest.

**BEANS** - (Do not apply within 3 days of harvest of fresh beans, 21 days of harvest for dried beans.) To control Mexican Bean Beetles, Leafhopper, Flea Beetles, Japanese Beetle, Velvet Bean Caterpillar, Lygus, Stink Bugs, Corn Earworm, Tarnish Plant Bug apply approximately 1-1/4 lb. per 1000 sq. ft. Do not feed treated bean vines to domestic animals.

**CORN** - [ears(2), forage(14), fodder(48)]: To control Corn Earworm, Fall Armyworms, Flea Beetles, Japanese Beetles, Sap beetles, Leafhoppers and European cornborers Apply approximately 1-1/4 lb. to 2 lbs. per 1,000 sq. ft. For cornborer and larvae in whorls (budworm damage) and for foliage feeders, apply thoroughly into the whorls when plants are about knee high. Repeat at weekly intervals until control is achieved. For insects attacking silks and ears, apply when first silks appear and continue until silks begin to dry. Three or more applications maybe required depending on severity of infestation. Re-apply immediately after rain. Allow 7 days before harvest, or before allowing domestic animals to feed in treated areas. Application of this product to the tassel region of corn during the pollen shed period will seriously reduce bee population.

**POTATOES (7), TOMATOES, EGGPLANT AND PEPPERS (3)**, - To control Colorado Potato Beetle, Flea Beetles, Leafhoppers, apply approximately 3/4 to 1-1/4 lb. per 1,000 sq. ft. To control Tomato Fruitworms, Fall Armyworm, Tomato Hornworm, European Corn Borer, StinkBugs, Lace Bugs, apply approximately 1-1/4lb. per 1,000 sq.ft.

**CUCUMBERS, SQUASH, PUMPKINS, MELONS (Canteloupe, Watermelon, Honeydew) (3)** - To control Pickleworm, Melonworm, Cucumber Beetles, Squash Bugs, Flea Beetles, Leafhoppers, apply approximately 3/4 to 1-1/4 lb. per 1,000 sq. ft.

**LETTUCE [head and leaf (14)], COLLARDS, KALE, TURNIP GREENS, MUSTARD GREENS, SPINACH (3)**, - To control Flea Beetles, Leafhoppers, Harlequin Bug, apply approximately 3/4 to 1-1/4 lb. per 1000 sq. ft. For six-spotted Leafhoppers, corn Earworm, Armyworm and Stink Bugs, apply approximately 1-1/4 to 2 lbs. per 1000 sq. ft. Do not apply within 14 days of harvest (except head lettuce-3 days).

**ASPARAGUS (1)** - To control Asparagus Beetle on spears, apply approximately 1-1/4 to 2-1/2 lbs. per 1000 sq. ft. Do not repeat application within 3 days. Do not apply within 1 day of harvest.

**CABBAGE, CARROTS, BROCCOLI, BRUSSELS SPROUTS (3)**, -

To control Flea Beetles, Harlequin Bugs apply approximately 3/4 to 1-1/4 lb. per 1000 sq. ft. For Corn Earworms, Stink Bugs, Armyworms, apply approximately 1-1/4 to 2 lbs. per 1000sq.ft. Do not apply within 3 days of harvest.

**GRAPES** –To control Leafhoppers, Japanese Beetles, Grape Berry Moths, June Beetles; apply approximately 1-1/4 to 2 lbs. per 1000 sq. ft. Allow 7 days to harvest.

**STRAWBERRIES (7)** - To control Meadow Spittle Bugs, Leaf Rollers, Strawberry Weevils, apply approximately 1-1/4 to 2 lbs. per 1000 sq. ft. Do not apply within 1 day of harvest.

**ROSES, AZALEAS AND OTHER ORNAMENTALS** – To control Japanese Beetles, Bag Worms, Flea Beetles, Leafhoppers, Scale insects, Tent caterpillars, apply approximately 1 -1/4 to 2 lbs. per 1000 sq. ft.

**DOGS, CATS - READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS OR CATS:** To control Fleas and Brown Dog Ticks: Use product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pets eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. Do not repeat treatment for 1 week. This product should not be applied by children. Do not use on pregnant dogs. Do not use on kittens or puppies under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing or medicated animals. Dust bedding and doghouse using a shaker can or other dust applicator.

Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

#### **STAINING PRECAUTION**

Staining may occur on certain surfaces such as stucco, brick, cinder block, wood, fabrics and carpet. Deposits on painted or stained surfaces or finishes (e.g. cars, house trailers, boats, etc.) should be immediately removed by washing to prevent discoloration. Avoid application to surfaces where visible residues are objectionable. Staining of fabrics and carpet may be permanent.

#### **CAUTION**

Maybe harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. DO Not-take internally. Wear regular long-sleeved work clothing. Change to clean clothing daily. NOTE FOR PHYSICIAN: Carbaryl is a moderate, reversible cholinesterase inhibitor. Atropine is antidotal. KEEP OUT OF REACH OF CHILDREN AND ANIMALS.

#### **STORAGE & 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 call CHEMTREC AT 1-303-424-9300 for disposal instructions. Never place unused product down any indoor or outdoor drain.

**NOTICE:** Buyer assumes all risks of use, storage or handling of this material not in strict accordance with DIRECTIONS and CAUTIONS stated on this label.

EPA REG. NO. 16-12  
 EPA Est. NO. 16-VA-1

BLUE DRAGON\* is a registered trademark of Dragon Chemical Corporation.

Manufactured by DRAGON CORP. P.O. Box 7311, Roanoke, VA 24019

**[VERSION B – table format]**

**DIRECTIONS FOR USE**

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

**FOR HOMEOWNER USE ONLY.** Blue DRAGON® Garden Dust controls insects which attack vegetables, flowers, shrubs and trees. Apply when insects first appear before damage from feeding occurs. 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 upper and lower leaf surfaces with a thin, even film of dust. 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. Do not repeat application more than once a week. Do not use with lime or other alkaline materials. Blue Dragon Garden Dust may be applied up to harvest except where noted. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

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VEGETABLE GARDENS			
CROP	INSECTS	USE RATE PER 1,000 SQ. FT.	PHI
BEANS	Mexican Bean Beetles, Leafhopper, Flea Beetles, Japanese Beetle, Velvet Bean Caterpillar, Lygus, Stink Bugs, Corn Earworm, Tarnish Plant Bug	1-1/4 lb.	Do not apply within 3 days of harvest of fresh beans, 21 days of harvest for dried beans
<b>SPECIAL INSTRUCTIONS:</b> Do not feed treated bean vines to domestic animals.			
CORN	Corn Earworm, Fall Armyworms, Flea Beetles, Japanese Beetles, Sap beetles,	1-1/4 lb. to 2 lbs.	ears(2); forage(14); fodder(43)

	Leafhoppers and European cornborers		
	<b>SPECIAL INSTRUCTIONS:</b> For cornborer and larvae in whorls (budworm damage) and for foliage feeders, apply thoroughly into the whorls when plants are about knee high. Repeat at weekly intervals until control is achieved. For insects attacking silks and ears, apply when first silks appear and continue until silks begin to dry. Three or more applications maybe required depending on severity of infestation. Re-apply immediately after rain. Allow 7 days before harvest, or before allowing domestic animals to feed in treated areas. Application of this product to the tassel region of corn during the pollen shed period will seriously reduce bee population.		
<b>POTATOES TOMATOES, EGGPLANT AND PEPPERS</b>	Colorado Potato Beetle, Flea Beetles, Leafhoppers,	3/4 to 1-1/4 lb.	<b>POTATOES (7)  TOMATOES, EGGPLANT &amp; PEPPERS 3</b>
	Tomato Fruitworms, Fall Armyworm, Tomato Hornworm, European Corn Borer, StinkBugs, Lace Bugs	1-1/4lb	
<b>CUCUMBERS, SQUASH, PUMPKINS, MELONS (Canteloupe, Watermelon, Honeydew)</b>	Pickleworm, Melonworm, Cucumber Beetles, Squash Bugs, Flea Beetles, Leafhoppers,	3/4 to 1-1/4 lb.	3
<b>LETTUCE, COLLARDS, KALE, TURNIP GREENS, MUSTARD GREENS, SPINACH</b>	Flea Beetles, Leafhoppers, Harlequin Bug,	3/4 to 1-1/4 lb.	<b>LETTUCE [head and leaf (14)]: COLLARDS, KALE, TURNIP GREENS, MUSTARD GREENS, SPINACH (3),</b>
	six-spotted Leafhoppers, corn Earworm,	1-1/4 to 2 lbs.	



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	Armyworm and Stink Bugs,		
<b>ASPARAGUS</b>	Asparagus Beetle on spears	1-1/4 to 2-1/2 lbs.	Do not repeat application within 3 days. Do not apply within 1 day of harvest.
<b>CABBAGE, CARROTS, BROCCOLI, BRUSSELS SPROUTS</b>	Flea Beetles, Harlequin Bugs	3/4 to 1-1/4 lb.	3
	Corn Earworms, Stink Bugs, Armyworms,	1-1/4 to 2 lbs.	
<b>FRUITS</b>			
<b>CROP</b>	<b>INSECTS</b>	<b>USE RATE PER 1,000 SQ. FT.</b>	<b>PHI</b>
<b>GRAPES</b> —. To control apply per 1000 sq. ft.	Leafhoppers, Japanese Beetles, Grape Berry Moths, June Beetles;	1-1/4 to 2 lbs.	Allow 7 days to harvest.
<b>STRAWBERRIES,</b>	Meadow Spittle Bugs, Leaf Rollers, Strawberry Weevils	1-1/4 to 2 lbs.	Do not apply within 1 day of harvest.
<b>ROSES &amp; ORNAMENTAL GARDENS</b>			
<b>SITE</b>	<b>INSECTS</b>	<b>USE RATE PER 1,000 SQ. FT.</b>	
<b>ROSES, AZALEAS AND OTHER ORNAMENTALS</b>	Japanese Beetles, Bag Worms, Flea Beetles, Leafhoppers, Scale insects, Tent caterpillars	1 -1/4 to 2 lbs.	

<b>DOGS, CATS - READ ENTIRE LABEL BEFORE EACH USE.</b>	
<b>USE ONLY ON DOGS OR CATS:</b>	
<b>PEST</b>	<b>DIRECTIONS</b>
To control Fleas and Brown Dog Ticks:	Use product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pets eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. Do not repeat treatment for 1 week. This product should not be applied by children. Do not use on pregnant dogs. Do not use on kittens or puppies under 12 weeks of age. Consult a veterinarian before using this product on

	debilitated, aged, pregnant, nursing or medicated animals. Dust bedding and doghouse using a shaker can or other dust applicator.
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