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

APR 19 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
Dragon 5%Garden Dust
EPA Reg. No. 16-27
Submission dated March 19, 2004, **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 re-treatment directions under Dogs, Cats...Use Only on Dogs and Cats 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.
- 2) 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".

The primary brand name was changed to Dragon 5%Garden Dust
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,

A handwritten signature in black ink that reads "Akiva Abramovitch".

Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch
Registration Division (7505C)

**DRAGON® 5% Garden Dust
Contains Carbaryl Based Insecticide**

Controls Listed Insects Attacking Vegetables, Grapes, Ornamentals And Shrubs.

ACTIVE INGREDIENT:

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

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

APR 19 2004

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

16-27

**Keep Out of Reach of Children
CAUTION**

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

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. DRAGON® 5% GARDEN DUST controls a wide range of insect pests. 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. For plants above chest height, consider using Dragon® Lawn & Garden Liquid Concentrate. Do not reapply this product less than 30 days from the last application. Do not use with lime or other alkaline materials. 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- [(3) succulents, (21) dried, (14) forage, (21) hay] To kill Mexican bean beetles, Leafhoppers, Flea beetles, apply approximately 1/2 lb./1,000 sq. ft. Reapply as necessary every 7 days. DO NOT feed treated bean vines to domestic animals.

LETTUCE- [(14) head and leaf] To kill Lygus and Stink bugs, [apply approximately 1 lb./1000 sq. ft. Retreat as necessary every 7 days. No more than 5 applications.

CORN- [(2) ears, (14) forage, (48) fodder] Repeat as necessary every 3 days. Use approximately 3/4 lb./1,000 sq. ft. for Corn earworms, Fall armyworms, Flea beetles, Japanese beetles, Sap beetles, Leafhoppers and European corn borers. For corn borers 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 may be 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 populations.

POTATOES(7), TOMATOES, EGGPLANT AND PEPPERS(3)- To kill Colorado potato beetles, Leafhopper, and Flea beetles, apply approximately 1/2 lb./1,000 sq. ft. Retreatment interval=7 days PHI= 7days. Total number of applications/crops can be 6 (some of which must be at lower than maximum single application rate). To kill Tomato fruitworms, Fall armyworms, Tomato hornworms, European corn borers, Stink bugs and Lygus bugs, apply approximately 3/4 lb./1,000 sq. ft. Retreat every 7 days as needed for a total of 7 applications for Tomatoes, Eggplant and Peppers. Retreat every 7 days as needed for a total of 6 applications for Potatoes.

CUCUMBERS, SUMMER SQUASH(3)- To kill Pickleworms, Melonworms, Cucumber beetles, Squash bugs, Flea beetles, apply approximately 1/2 lb./1,000 sq. ft. Retreat every 7 days as needed.

GRAPES- To kill Leafhoppers, Japanese beetles, Grape berry moths, apply approximately 1 lb./1,000 sq. ft. Allow 7 days before harvest.

STRAWBERRIES(7)- To kill Meadow spittlebugs, Leaf rollers, apply approximately 1 lb./1,000 sq. ft. Retreat every 7 days as needed.

ROSES, AZALEAS, AND OTHER ORNAMENTALS- To kill Japanese beetles, Periodical cicadas, Aphids, Tent caterpillars, Lace bugs, Boxwood leaf miners, apply approximately 1¼ lbs./1,000 sq. ft. Injury to tender foliage may occur if plants are wet when dusted or in presence of high humidity. DO NOT use on Boston ivy.

DOGS, CATS - READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS OR CATS: This product should not be applied by children. To kill 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed inhaled or absorbed through the skin. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash thoroughly before reuse. 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 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.

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 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.

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 1-800-424-9300 for disposal instructions. Never place unused product down any indoor or outdoor drain.

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.

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.

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.

EPA REG. 16-27

Manufactured by
DRAGON CHEMICAL CORPORATION
Roanoke, VA 24019-7311
www.dragonchemical.com
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