



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

DEC 4 2003

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment: First Aid, Storage & Disposal
Turf Protect R
EPA Reg. No. 16-177
Submission dated August 20, 2003, **acceptable with comments.**

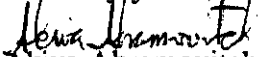
Dear Mr. McEntee:

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) Delete on page 3 the Preharvest and Grazing Restrictions that address plant rotational food, reclamation of irrigation water and (?) grazing of dairy and meat animals which are more applicable for agricultural use products.
- 2) Add to the Precautionary Statements "Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse".
- 3) Delete under the Directions for Use the "Do not apply this product in a way that will contact workers.....either directly or through drift" since it is more applicable to agricultural products than to homeowners products.
- 4) Delete Amblyomma spp from the Lyme Disease section since it has not been found to be a carrier of the disease.
- 5) The Directions for Use "For plants above chest height....." does not appear to be necessary for granular formulation applied to the ground and may be deleted.
- 6) Delete "for terrestrial uses" from the Environmental Hazards since only terrestrial uses are listed.

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)

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**TURF PROTECT•R
Granular Carbaryl Insecticide**

For Outdoor Home Insecticide Use

For Home Insecticide Use

Active Ingredient: Carbaryl (1-naphthyl N-methylcarbamate).....	7.0% by wt.
Inert Ingredients:.....	93.0% by wt.
Total	100.0%

E.P.A. Reg. No. 16-177

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

**For MEDICAL and TRANSPORTATION Emergencies ONLY
Call 24 Hours A Day at CHEMTREC (800)424-9300**

For PRODUCT USE Information Call (540) 362-3657

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

DEC 4 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
16-177**

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.*

GENERAL

Contact a physician immediately in all cases of suspected poisoning. Transport to a physician or hospital immediately and **SHOW A COPY OF THIS LABEL TO THE PHYSICIAN**. If poisoning is suspected in animals, contact a veterinarian.

ANTIDOTE STATEMENT

ATROPINE SULFATE IS HIGHLY EFFECTIVE AS AN ANTIDOTE. See NOTE TO PHYSICIAN.

NOTE TO PHYSICIAN

Carbaryl is a N-methyl carbamate insecticide, which is a cholinesterase inhibitor. Atropine is antidotal. Narcotics and other sedatives should not be used. Further, drugs like 2-PAM (pyridine-2-aldoxime methiodide) are NOT recommended.

Consultation on diagnosis, therapy and analysis can be obtained at all hours by calling the emergency number.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (& DOMESTIC ANIMALS)

CAUTION

HARMFUL IF SWALLOWED, ABSORBED THROUGH THE SKIN, INHALED, OR IF IN EYES.

Avoid breathing vapors or dust. Avoid contact with eyes, skin or clothing. Keep out of reach of children and domestic animals.

PERSONAL PROTECTIVE EQUIPMENT:

Applicators and other handlers must wear long-sleeved shirt and long pants, shoes plus socks and household or latex rubber gloves.

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

User Safety Recommendations

- 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.

ENVIRONMENTAL HAZARDS

This product 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 equipment or disposal of wastes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. Read entire label before using this product.

Strictly observe label directions and cautions. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Unprotected persons must vacate the area being treated.

STORAGE AND DISPOSAL

STORAGE

Store unused product in original container only, in cool, dry area out of reach of children and animals. Do not store in areas where temperatures frequently exceed 100°F.

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.

GENERAL CAUTIONS AND RESTRICTIONS

EASY GARDEN Granular Carbaryl Insecticide is a granular formulation of Carbaryl which may be applied by ground equipment.

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

For plants above chest height, consider using a liquid Carbaryl product.

Do not repeat applications more than once per week.

PLANT RESPONSE PRECAUTIONS

Application to wet foliage or during periods of high humidity may cause injury to tender foliage.

PREHARVEST AND GRAZING RESTRICTIONS AND LIMITATIONS

Tolerances established under the Federal Food, Drug and Cosmetic Act permit the sale of labeled crops bearing probable Carbaryl residues when this product is used in accordance with the label directions. If used as directed, treated forage may be grazed or used as feed for dairy and meat animals without causing illegal residues in meat or milk. Do not apply at greater rates or at more frequent intervals than stated on the label. To do so may result in illegal residues in crops, meat, and milk.

Do not use reclaimed irrigation water from crops treated with Carbaryl on crops for which Carbaryl tolerances are not established.

Do not plant rotational food and feed crops not listed on this or other Carbaryl labels in Carbaryl treated soil.

APPLICATION STATEMENT

Calibrate and adjust application equipment to insure proper rate and accurate placement.

SPECIFIC USE DIRECTIONS

TURFGRASS

For control of turfgrass pests, apply granules uniformly to dry turfgrass. For optimum control, follow specific directions for proper application and irrigation.

CROP	PEST	POUNDS OF EASY GARDEN GRANULAR PER 1000 SQ. FT.	SPECIFIC DIRECTIONS
Lawns, Recreational and Ornamental Turf Areas	Ants Armyworm Centipedes Chiggers Chinch bugs Cutworms Earwigs Essex skipper European chafer Fall armyworm Fiery skipper Grasshoppers Green June beetle larvae Leafhoppers Lucerne moth Millipedes Mosquitoes (adults) Scarab beetle adults (such as May beetle, June beetle, Japanese beetle, green June beetle) Sod webworm (lawn moths) Sowbugs Spittlebugs Springtails Ticks Yellow striped armyworm	2.2 to 3.0	For effective control, irrigate after application to remove chemical from granules. Repeat applications as necessary up to a total of 4 times per year but not more often than once every 7 days.
	Billbug larvae European crane fly larvae Fleas White grubs (such as Japanese beetle larvae, Chafer beetle larvae, and <i>Phyllophaga</i> spp. larvae and annual white grubs) Black turfgrass Ataenius beetle larvae Hyperodes weevil (bluegrass weevil) larvae	3.0	For effective control of subsurface pests, apply when insects are actively feeding near the soil surface, usually during late March through May, or July through early September, or as recommended by local Agricultural Extension Service Agents. Irrigate thoroughly after application to remove chemical from granules and move it down into the thatch. Repeat applications as necessary up to 2 times per year but not more often than once every 7 days.

RESTRICTIONS AND LIMITATIONS: TURFGRASS

DO NOT ALLOW PUBLIC USE OF TREATED AREAS DURING APPLICATION.

CONTROL OF TICKS WHICH VECTOR LYME DISEASE

For control of juvenile and adult *Ixodes* spp. ticks (Deer tick, Bear tick, and Black legged tick) and *Amblyomma* spp. ticks (Lone star tick). Apply granules at the rate of 2.5 to 3.0 pounds of formulated product per 1000 square feet.

Begin applications in late spring or early summer (May/June). Apply the recommended amount of product uniformly across the entire lawn, perimeter wooded areas, and property boundaries including shrub beds, ornamental plantings, and wooded areas where exposure to ticks may occur. For optimum results, irrigate treated areas after application to remove chemical from granules.

FIRE ANTS

For use as a mound treatment to control fire ants, apply 1.5 to 3.0 ounces by weight over and around each fire ant mound. Thoroughly irrigate mound immediately after treatment to remove the chemical from the granules and flush it down into the mound. A minimum of 1 gallon of water should be applied to each mound, but do not use more than 2 gallons of water as flooding of the mound may result. Apply water gently to avoid disturbing ants and causing migration before chemical can be effective. For best results, apply in the early morning or late evening hours when ants are least active. Treat new mounds as they appear.

NUISANCE PEST CONTROL

For use in and around flower beds and ornamental plantings and around buildings.

PEST	POUNDS OF EASY GARDEN GRANULAR PER 1000 SQ. FT.	SPECIFIC DIRECTIONS
Ants Armyworms Ticks Centipedes Crickets Cutworms Earwigs Firebrats Fleas Millipedes Scorpions Silverfish Spiders	3.0	Observe plant response precautions. Apply granules in a 6 foot band around the building, to shrub and flower beds, foundations, ornamental plantings, and lawn or soil areas immediately adjacent to the building. For most effective control, treated area should be lightly watered after application to remove the chemical from the granules.

**NUISANCE PEST CONTROL IN VEGETABLES AND SMALL FRUITS
(NOT FOR USE IN CALIFORNIA)**

For control of Ants, Centipedes, Crickets, Cutworms, Earwigs, Grasshoppers, Millipedes, Sowbugs (Pillbugs), Springtails, and Ticks, apply Easy Garden Carbaryl Granules evenly over the soil surface. Water lightly after application to release the chemical from the granules. Applications may be made at any time before, during or after the growing season except as indicated in the specific directions for asparagus. Do not use on crops other than those listed below. Observe the pre-harvest intervals* for applications during the growing season:

CROP	POUNDS OF EASY GARDEN GRANULAR PER 1000 SQ. FT.	PRE-HARVEST INTERVAL* IN DAYS	SPECIFIC DIRECTIONS
Asparagus	0.65	1	Repeat applications as necessary up to a total of 3 times prior to harvest or a total of 4 times per year but not more often than once every 7 days.

Broccoli, Brussel Sprouts, Cabbage, Cauliflower, Collards, Kale, Mustard greens, Kohlrabi, Chinese Cabbage	0.65	3 Broccoli, Brussel Sprouts, Cabbage, Cauliflower, Kohlrabi 14 Chinese Cabbage, Collards, Kale, Mustard greens	Repeat applications as necessary up to a total of 3 times but not more often than once every 7 days.
Sweet Corn	0.65	2Ears 14 Forage 48 Fodder	Repeat applications as necessary up to a total of 4 times but not more often than once every 7 days.
Eggplant, Peppers, Tomatoes	0.65	3	Repeat applications as necessary up to a total of 4 times but not more often than once every 7 days.
Carrots, Garden Beets (roots), Horseradish, Parsnips, Potatoes, Radishes, Rutabagas, Salsify, Sweet Potatoes, Turnips (roots)	0.65	7	Repeat applications as necessary up to a total of 3 times but not more often than once every 7 days.
Strawberries	0.65	7	Repeat applications as necessary up to a total of 4 times but not more often than once every 7 days. Carbaryl may injure Early Dawn and Sunrise varieties of strawberries.
Celery, Dandelion, Endive, Garden Beets (tops), Lettuce (head and leaf), Parsley, Rhubarb, Spinach, Swiss chard, Turnips (tops)	0.65	14	Repeat applications as necessary up to a total of 3 times per year but not more often than once every 7 days.
Sugar Beets	0.5	28 (roots and forage)	Repeat applications as necessary up to a total of 2 times per year but not more often than once every 14 days.

*Pre-harvest interval: The time from treatment to harvesting.

NOTICE OF DISCLAIMER

BUYER SHALL BE SOLELY RESPONSIBLE FOR ANY AND ALL INJURY, LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS, OR CAUTIONS.

DRAGON CHEMICAL CORP.
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