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Stacy A. Schmidt SureCo 10012 N. Dale Mabry Hwy Suite 221 Tampa, FL 33618

Subject: Kill-Ko 10% Sevin® Dust EPA Registration No. 70-165 Amendment dated 7/3/96 - Deletion of tobacco from label and update of Environmental Hazards Section Amendment dated 10/29/96 - Response to Agency letter dated 10/1/96

Dear Ms. Schmidt:

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) In the Directions for Use for CORN, delete the sentence "Repeat applications at 2 to 3 day intervals." As indicated in the new requirements for carbaryl homeowner products, applications should not be repeated more than once a week.

b) In the Directions for Use for GRAPES, delete the sentence "Apply as needed for leafhoppers."

c) In the Directions for Use for FLOWERS, SHRUBS, ORNAMENTAL TREES, delete "or as needed" in the second to last sentence.

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

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.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1411-5

PLEASE NOTE: The Agency has determined that using a homeowner dust product on trees is not practical and in fact, consumers rarely use dusts on trees. because a liquid product is easier to use Rhône-Poulenc, the technical registrant of carbaryl, has written a letter to registrants of carbaryl products which states that their technical label will prohibit the formulation of carbaryl into dust products for use on trees. As a result, you will be required to delete all trees from your label. You will receive a letter from the Agency in the near future regarding this label change and the timing required for submission of revised labels. You may choose to market your product without use directions for trees if you choose to do so.

A stamped copy of the labeling is enclosed for your records. If you have any questions about this letter, please contact Beth Edwards at (703) 305-5400.

Sincerely yours,

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

Enclosure

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Printed on Recycled Paper

U.S. Government Printing Office: 1992 -- 620-855/40572

FOR HOMEOWNER USE ONLY

KILL-KO 10% SEVIN® brand carbaryl insecticide DUST

Active Ingredient: Inert Ingredient: 90.00% Total: 100.00%

Sevin® is a registered trademark of Rhone Poulenc for carbaryl insecticide

EPA Reg. No. 70-165

EPA Est. No. 769-GA-1

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KEEP OUT OF REACH OF CHILDREN CAUTION

See Side Panel For Additional Precautionary Statements

Net Weight:

Manufactured By: **Rigo Company** Louisville, KY 40222

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PRECAUTIONARY STATEMENTS Hazards To Humans CAUTION

Harmful if swallowed or inhaled. Avoid breathing of dust. Avoid contact with skin; wash thoroughly after using. Avoid storage near feed and food products.

ENVIRONMENTAL HAZARDS

This pesticide 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.

PHYTOTOXICITY: Some phytotoxicity may occur on tender foliage in the presence of rain or high humidity of several days duration following dusting. May cause foliar injury when used before second cover on McIntosh and York apples in the Eastern United States.

STORAGE AND DISPOSAL

Storage: Store pesticide in original container. Do not store near food or food products. **Container Disposai:** Do not reuse empty container. Wrap and dispose of empty containers in trash collection.

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.

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 of dust.

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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.

DIRECTIONS FOR USE

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

VEGETABLES: Use the amount; of dust necessary to provide adequate coverage. Begin applications when insects or damage appears and continue 7 to 10 day intervals or as necessary for good control. This product can be used up to and including the day of harvest on all vegetables listed except as noted below for Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Kohlrabl and Lettuce.

BEANS: To control Mexican bean beetle - apply the dust to thoroughly cover upper and lower leaf surfaces. Also to control Bean Leaf Beetle, Cucumber beetle, Western bean cutworm, Flea beetle and Japanese beetle, Corn earworm, Armyworms and Velvetbean caterpillar, Lima bean pod borer, Lygus bug and Stink bug, apply the dust to thoroughly cover upper and lower leaf surfaces.

CABBAGE, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER, KOHLRABI: To control Flea beetle, Harlequin bugs, Corn earworm, Armyworm, Cabbage caterpillars and small cabbage loopers, apply the dust to thoroughly cover upper and lower leaf surfaces. CAUTION: Allow 3 days between last application and harvest.

CORN: To control - Corn earworms, European corn borer, Fall armyworms, Sap beetles and Japanese beetle, apply the dust to thoroughly cover upper and lower leaf surfaces. For corn earworn, begin when first silks appear and direct to the zone of ear production. Repeat applications at 2 to 3 dayintervals until the silks begin to dry. Three or more applications may be required depending upon the severity of infestation. Allow 7 days between last application and harvest if corn is to be used as forage or fodder to be fed to dairy or;meat animals. CAUTION: Application of this product to the tassel region of the corn during the pollen shed period will seriously reduce bee population.

TOMATO, EGGPLANT, PEPPER: To control - Tomato fruitworm, Fall armyworm, Flea beetles and Lygus bugs, apply the dust to thoroughly cover upper and lower leaf surfaces.

CUCUMBER, SQUASH, CANTALOUPE, PUNPKINS, MELONS: To control -Pickleworm, Melonworm, Cucumber beetles, Squash bug, Flea beetles, apply the dust to thoroughly cover upper and lower leaf surfaces.

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LETTUCE: To control - Flea beetles, Harlequin bug, Leafhopper, Com earworm, Armyworm, Cabbage caterpillars, Spittlebugs, Lygus and Stink bugs, apply the dust to thoroughly cover upper and lower leaf surfaces. On head lettuce, do not apply within 3 days of harvest. On leaf lettuce do not apply within 14 days of harvest.

CARROTS: To control - Flea beetles, Leafhoppers, Sptttlebugs and Stink bugs, apply the dust to thoroughly cover upper and lower leaf surfaces.

OKRA: To control - Corn earworm and Stink bugs, apply the dust to thoroughly cover upper and lower leaf surfaces.

POTATOES: To control - Colorado potato beetle, Leafhopper, Flea beetles, and Lygus bugs, apply the dust to thoroughly cover upper and lower leaf surfaces.

FRUITS: This material may be applied up to 1 day of harvest on Apples, Pears, Peaches, Plums, Prunes, Cherries and Strawberries It may be applied the day of harvest on Grapes.

APPLES, PEARS: To control-- Codling moth, Green apple aphid, White apple leafhopper and Apple mealybug, Apple maggot, Plum Curculio, Rosy Apple aphid, Red-banded leaf roller, Fruit tree leaf roller, Pear psylla, Periodical cicada, Eye spotted bud moth, European applb sawfly, Eastern tent caterpillar, Japanese beetle, Tentiform leaf miner, Forbes scale, San Jose scale, nyster shell scale and Lecanium scale.

Use 5 to 7 1/2 pounds per 5,000 sq.ft. To control - Plum Curculio and Codling moths apply at petal fall and every 10 to 14 days thereafter until control is achieved. To control rosy aphid apply before leaves are curled.

Apply at 10-day intervals for optimum apple maggot control. Applications of Dust within 30 days after full bloom may cause fruit thinning. To avoid this, delay use until at least 30 days after bloom. To avoid possible fruit thinning on apples and foliar injury on McIntosh, do nOtapply within 15 days after petal fall.

PEACHES: To control - Plum curculio, Oriental fruit moth, Peach twig borer, Lesser Peach tree borer, Catfacing plant bugs, Periodical cicada, Japanese beetle, San Jose scale, Lecanium scale, Olive scale and Forbes scale. Use 5 to 7 1/2 lb. per 5000 sq.ft. To control - codling moth, Oriental Fruit Moth and Plum Curculio apply at petal fall and every 10 to 14 days thereafter until control is achieved. For peach tree borer control, dust limbs and trunk thoroughly.

PLUMS, PREMES, CHERRIES: To control - Cherry fruit fly, Fruit tree leaf roller, Peach twig borer, Lesser Peach tree borer, Black Cherry aphid, Eyespotted bud moth, Red-banded leaf roller, Japanese beetle, Forbes scale, San Jose scale, Oystershell and Lecanium scale, Eastern Tent caterpillar, Orange tortrix and Western tussock

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moth. Use 5 lbs. per 5,000 sq.ft. To control - Plum curculio and codling moths apply at petal fall and every 10 to 14 days thereafter as long as local conditions warrant.

GRAPES: To control Grape leaf folder and Grape Berry moth and Japanese beetle, apply the dust to thoroughly cover upper and lower leaf surfaces. Apply just before first brood larvae emerge from-rolls. Apply as needed for leafhoppers

STRAWBERRIES: To control - Meadow spittlebug and Strawberry leaf roller apply the dust to thoroughly cover upper and lower leaf surfaces.

FLOWERS, SHRUBS, ORNAMENTAL TREES: To control - Apple aphid, Bagworms, Birch leaf miner, Blister beetles, Boxelder-bugs, Boxwood leaf miner, Elm leaf aphid, Elm leaf beetle, Flea beetles, Japanese beetles, Lace bugs, Leafhoppers, leaf rollers, Oak leaf miner, Orange tortrix, Periodical cicada, Plant bugs, Psyllids, Rose aphids, Rose-slug, Scale insects, Tent caterpillars, Willow leaf beetle and exposed Thrips, apply the dust to thoroughly cover upper and lower leaf surfaces. Apply when insects or damage first appears and repeat at weekly intervals or as needed. For scale insect control, apply in spring and early summer when scale crawlers are present.

POULTRY

DIRECT DUST APPLICATION TO BIRDS: Use 1/2 pound per 100 birds. Apply by shaker can or hand duster for control of northern fowl mite and lice and as a supplement to premises treatment for chicken mites and fleas. Directly dust each bird and fluff feathers. DO NOT APPLY WITHIN 7 DAYS OF SLAUGHTER. Repeat treatment in four weeks if necessary. Direct dusting is a supplement to litter treatment for control of the above insects.

LITTER TREATMENT: Apply thoroughly to floors, roosts and interior surfaces, using 1/2 pound per 40 square feet to control chicken mites, fleas and bed bugs. Apply by shaker can or hand duster. Do not apply directly to eggs or nest litter. Do not house birds in treated houses within 7 days of slaughter. Do not contaminate feed or drinking water.

POULTRY DUSTING BOX: For control of northern fowl mite, chicken mite, lice and fleas, place one self-treatment dust box (18x12x3 inches deep) containing 1 1/4 pound 10% SEVIN DUST per each 50 birds. Allow birds to dust themselves. This is a supplement to litter treatment for chicken red mite and flea control. Remove birds from dust boxes 7 days before slaughter.

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DOGS AND CATS

Use this product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pet's eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. 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. Dust bedding and doghouse using a shaker can or other dust applicator.

FOR FLEAS, LICE AND BROWN DOG TICKS: Brush hair back and apply powder down to skin and directly to ticks. Spray powder on floor of kennel in cracks, crevices and other hiding places. If the animal has free run, treatments may have to be made every second or third week, but not more frequently that once a week. To avoid unnecessary applications, animal should be closely examined for fleas before retreating. If the animal is confined to an area free of fleas, one treatment may be sufficient. Repeat if necessary but not more frequently than once a week.

For control of fleas in Kennels, Pens, Yards, Lawns and under Houses, remove manure or debris and dust approximately 4 oz. on an area up to 180 square feet.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

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