

Stacy A Schmidt  
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Suite 221  
Tampa, FL 33618

FEB 11 1997

Subject Kill Ko 5% Sevin® Dust  
EPA Registration No 70-166  
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) The new DIRECTIONS FOR USE outlined in the Agency letter dated 10/1/96 must be included under the heading DIRECTIONS FOR USE on your label. The DIRECTIONS FOR USE should be located directly beneath the User Safety Requirements box as follows

**"DIRECTIONS FOR USE**

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

Wearing household latex or rubber gloves, use a dust applicator "

b) In the DIRECTIONS FOR USE, delete the sentence "Use the amount of dust necessary to provide adequate coverage" because it contradicts the new instructions. The new instructions are "Dust lightly to cover both upper and lower leaf surfaces with a thin, even film of dust "

c) Throughout your label, several of the crops contain instructions to "dust to thoroughly cover" upper and lower leaf surfaces. In order to avoid confusion with the new instructions, please replace "thoroughly" with the word "lightly" each time it appears in your Directions for Use. The phrase should read "dust to lightly cover upper and lower leaf surfaces "

d) In the Directions for Use on CORN, delete the sentence "Repeat applications at 2 to 3 day intervals until the silks begin to dry." This is contradictory to the 1 week application interval required in the Agency letter dated 10/1/96

- e) In the Directions for Use on GRAPES, delete "Apply as needed for leafhoppers."
- f) In the Directions for Use on FLOWERS, SHRUBS, delete "or as needed" from the second to last sentence.
- g) Please correct the following spelling errors:

- 1) In the sentence "CAUTION: Application of *bus* product...", change "bus" to "this."
- 2) In the sentence "TOMATO, EGGPLANT, PEPPER: To control - Tomato fruitworm, Fall armyworm, *Flea* beetles,....", change "Flea" to "Flea."
- 3) In the Directions for Use on FLOWERS, in the sentence "For scale insect control, apply in *spnng* and...", change "spnng" to "spring."
- 4) In the section "FOR FLEAS", in the sentence "...but not more frequently *then* once a week", change "then" to "than."

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

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.

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. If you have any questions about this letter, please contact Beth Edwards at (703) 305-5400.

Sincerely yours,

DHE

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

Enclosure		CONCURRENCES						
SYMBOL								
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# KILL-KO 5% SEVIN® brand carbaryl insecticide VEGETABLE DUST FOR GARDEN INSECTS

Kills Many Pests That Harm Lawns, Orchards, Gardens and Pets

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Active Ingredient:	
Carbaryl ((1-Naphthyl N-methylcarbamate) .....	5.00%
Inert Ingredients: .....	95.00%
Total:	100.00%

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

EPA Reg. No. 70-166

EPA Est. No. 769-GA-1

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. **NOTE TO PHYSICIAN:** Carbaryl is a moderate, reversible cholinesterase inhibitor. Atropine is antidotal. Do not use 2-PAM, opiates or cholinesterase-inhibiting drugs.

## ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic and estuarine invertebrates. Do not apply directly to water or wetlands. 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.

## STORAGE AND DISPOSAL

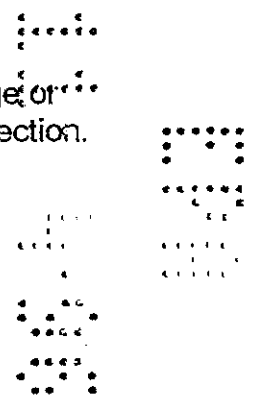
Store in original container. Do not contaminate water, feed or food by storage or disposal. Do not reuse empty container. Wrap container and put in trash collection.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 11 1997

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

70-166



**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.

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.

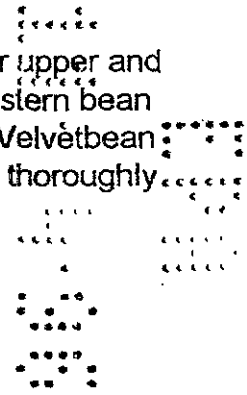
**DIRECTIONS FOR USE**

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

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, Kohlrabi and Lettuce.

**VEGETABLES**

**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, armyworms, 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 earworm, Fall armyworm, Sap beetles and Japanese beetle, apply the dust to thoroughly cover upper and lower leaf surfaces. For the European corn borer, apply thoroughly into whorls when the plant is about knee high and repeat weekly intervals until control is achieved. For corn earworm begin when first silks appear and direct to the zone of ear production. Repeat applications at 2 to 3 day intervals 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 bus 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, Leafhoppers, Tomato hornworm, Stink bugs, apply the dust to thoroughly cover upper and lower leaf surfaces. **CUCUMBER, SQUASH, CANTALOUPE, PUMPKINS, MELONS:** To control Pickleworm, Melonworm, Cucumber beetles, Squash bug, Flea beetles, apply the dust to thoroughly cover upper and lower leaf surfaces.

**LETTUCE:** To control - Flea beetles, Harlequin bug, Leafhopper, Corn earworm, Armyworm, Cabbage caterpillars, Spittlebugs, Lygus and Stink bugs, apply the dust to thoroughly cover upper and lower leaf surfaces. CAUTION: 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, Spittlebugs 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, Redbanded leaf roller, Fruit tree leaf roller, Pear psylla, Periodical cicada, Eye spotted bud moth, European apple sawfly, Eastern tent caterpillar, Japanese beetle, Tentiform leaf miner, Forbes scale, San Jose scale, Oystershell scale and Lecanium scale. Use 1 - 1 1/2 pounds per 500 square feet. For scale control, apply when crawlers are present in spring and early summer. 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 for optimum Apple maggot control. Application of 5% SEVIN DUST within 30 days after full bloom may cause fruit thinning. To avoid this, delay use until at least 30 days after

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bloom. May cause foliar injury if used before second cover on York and McIntosh apples.

**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 1 - 1 1/2 pounds per 500 square feet. For scale control apply when crawlers are present in spring and early summer. 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, PRUNES, CHERRIES:** To control - Cherry fruit fly, Fruit tree leaf roller, Peach tree borer, Lesser Peach tree borer, Black Cherry aphid, Eyespotted bud moth, Redbanded leaf roller, Japanese beetle, Forbes scale, San Jose scale, Oystershell and Lecanium scale, Eastern Tent caterpillar, Orange tortrix and, Western tussock moth. Use 1 pound per 500 square feet. 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 beetles, 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. May be applied the day of harvest on grapes.

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

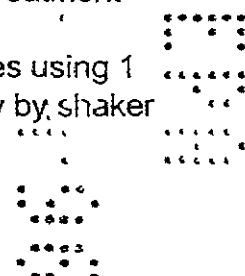
### FLOWERS, SHRUBS, ORNAMENTAL TREES

To control - Apple aphid, Bagworms, Birch leafminer, 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 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 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 wrthin 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 2 pounds of this product 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

**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 then 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

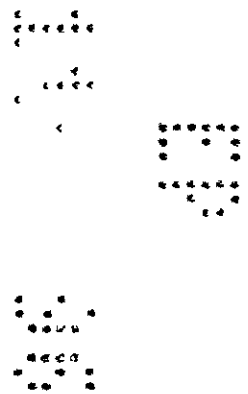
**CAUTION** Do not use on pregnant dogs For control of fleas in Kennels, Pens Yards Lawns and under Houses remove manure or debris and dust approximately 4 oz on an area up to 180 square feet

**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

NET WEIGHT \_\_\_\_\_

Manufactured by  
RIGO COMPANY  
LOUISVILLE KENTUCKY 40222

R-12B6



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