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769-559

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAR 4 1997

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

Subject: Royal Guard 5% Sevin®
EPA Registration No. 769-559
Amendment dated November 19, 1996
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 Precautionary Statements, delete the words "vapors" and "or spray mist" from the sentence "Avoid breathing vapors, dust, or spray mist." This product is a dust and therefore the words "vapors" and "spray mist" are inappropriate.

b) In the Environmental Hazards statement, delete the following:

"except under the forest canopy and use on rice. Discharge from rice fields may kill aquatic and estaurine invertebrates."

These sentences are inappropriate because this product is not registered for use on rice nor is it registered for use as a mosquito larvicide.

CONCURRENCES

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c) The User Safety Requirements that were required in the Agency letter dated 10/1/96 have been incorrectly placed in the NON-AGRICULTURAL USE REQUIREMENTS box. Delete these sentences ("Wear long-sleeved shirt, and the grass is dry") from the NON-AGRICULTURAL USE REQUIREMENTS box. The User Safety Requirements should appear on your label outlined by a box as shown below. In order to avoid confusion with Worker Protection Standard requirements, the heading of this box should be changed to RESIDENTIAL USER SAFETY REQUIREMENTS.

RESIDENTIAL 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.

d) In the Directions for Use on POTATO, delete "May be applied as foliage applications at 2-3 day intervals as infestation warrants." This contradicts the weekly application interval required in the Agency letter dated 10/1/96.

e) In the Directions for Use on SWEET CORN, delete "Make 3 to 4 applications at 2-3 day intervals as infestation warrants." This contradicts the weekly application interval required in the Agency letter dated 10/1/96.

f) In the Directions for Use on BEETS (Tops), COLLARDS, etc..., delete "5 to" in the last sentence.

g) The Directions for Use as PET INSECT CONTROL on your proposed label are confusing and contain contradictory and repetitious statements. Reconstruct the PET INSECT CONTROL section as follows:

"PET INSECT CONTROL

DOGS AND CATS: Against Brown Dog Ticks and Fleas. 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. Do not repeat applications more than once a week.

DOG AND CAT QUARTERS: For ticks and fleas, dust bedding, in and around sleeping quarters, kennels and doghouses using a shaker can or other dust applicator. Do not repeat application more than once a week."

h) The Directions for Use on FORAGE CROPS appears out of place on your label. Move these directions ("PASTURE FORAGE GRASSES,....TOBACCO") to the area of your label that lists agricultural crops.

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.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

/s/

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

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Royal Guard 5% Sevin®

ACTIVE INGREDIENT:	
Carbaryl (1-naphthyl N-methylcarbamate)	5.0%
INERT INGREDIENTS:	95.0%
Total:	100.0%

Sevin® is the registered trademark of RHONE-POULENC for Carbaryl Insecticide.

EPA REG #769-559

EPA EST #769-GA-1

ACCEPTED
with COMMENTS
in EPA Letter Dated

KEEP OUT OF REACH OF CHILDREN
CAUTION

MAR 4 1997

See Side Panel For Additional Precautionary Statements

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

769-559

STATEMENT OF PRACTICAL TREATMENT

This product is an N-methyl carbamate and is a cholinesterase inhibitor

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger or blunt object. Do not induce vomiting or give anything by mouth to an unconscious person. Call a physician or Poison Control Center.

IF INHALED: Remove victim to fresh air. Apply respiration if indicated. If symptoms occur, get medical attention.

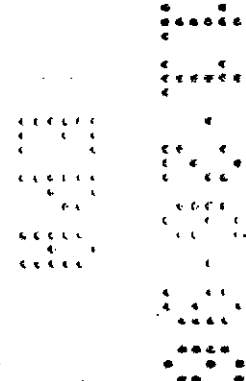
IF IN EYES: Flush eyes for at least 15 minutes with water. Call a physician immediately.

IF ON SKIN: Wash contaminated skin with soap and water.

NOTE TO PHYSICIAN: Carbaryl is a moderate reversible, Cholinesterase inhibitor. Atropine is antidotal. DO NOT use 2-PAM, opiates, or cholinesterase-inhibiting drugs.

Manufactured by:
SureCo, Inc.
Fort Valley, GA 31030

Net Contents: _____



PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION

May be harmful if swallowed. Do not take internally. Avoid contact with eyes, skin or clothing. Avoid breathing vapors, dust, or spray mist. Flush contaminated eyes with plenty of water and get medical attention if irritation persists.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- *Long-sleeved shirt and long pants.
- *Waterproof gloves.
- *Shoes plus socks.

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

User Safety Recommendations

Users should:

- *Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- *Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide 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, except under the forest canopy and use on rice. Discharge from rice fields may kill aquatic and estuarine invertebrates. Do not contaminate water by cleaning of equipment or disposal of wastes.

This product is highly toxic to bees exposed to direct treatment of 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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

STORAGE: Store in a cool, dry place. (In case of spill, remove spillage with an industrial type vacuum cleaner and wash area with household bleach).

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Do not reuse bag. Completely empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: Coveralls, Waterproof gloves, and Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forest, nurseries, or greenhouses. 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. Keep children and pets off treated areas until this material is washed into the soil and the grass is dry.

CHEMIGATION PROHIBITION

Do not apply this product through any type of irrigation system.

GENERAL INFORMATION

Use contrary to these directions may cause serious plant, crop or personal injury, excessive residues, unsatisfactory control or other unintended consequences.

FOR HOME AND GARDEN USE: 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.

BEANS: Against Mexican Bean Beetle and Leafhoppers, dust thoroughly with 20 pounds per acre every 7 to 10 days as needed, beginning when insects first appear. Against Lygus and Stink bugs, apply 40 pounds (no more) per acre every 7 to 10 days or as necessary. In home garden, apply 1 to 2 ounces per 50 ft. of row. May be applied up to harvest, at rates directed, without exceeding residue tolerance.

CUCUMBER, SUMMER SQUASH, CANTALOUPE, PUMPKINS, MELONS: Against Striped and Spotted Cucumber Beetles, Squash Bugs, Flea Beetles, Pickleworm and Melonworm, dust thoroughly with 20 pounds (no more) per acre every 7 to 10 days, beginning when insects first appear. In home garden, apply 1 ounce per 50 ft. of row. May be applied up to harvest, at rates directed, without exceeding residue tolerances.

TOMATO, EGGPLANT, PEPPER: Against Tomato Fruitworm, Fall Armyworm, and Flea Beetles, dust thoroughly with 20 to 40 pounds per acre every 7 to 10 days, beginning when insects first appear. Against Tomato Hornworm, European Corn Borer and Stink Bugs, dust thoroughly with 40 to 80 pounds per acre (no

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more than 80 pounds/acre) every 7 to 10 days. In home garden, apply 1 to 2 ounces per 50 ft. of row. May be applied up to day of harvest, at rates directed, without exceeding residue tolerances.

POTATO: Against Colorado Potato Beetle, Leafhoppers, and Flea Beetles, dust thoroughly with 20 pounds per acre every 7 to 10 days. Against Lygus bugs, apply 40 pounds (no more) per acre every 7 to 10 days or as necessary. In home garden, apply 1 to 2 ounces per 50 ft. of row. May be applied as foliage applications at 2 - 3 day intervals as infestation warrants. Re-apply immediately after rain. May be applied up to harvest, at rates directed, without exceeding residue tolerances.

SWEET CORN: Against Corn Earworms, use at a rate of 35 to 40 pounds per acre (no more). Apply to silks as soon as they appear. Make 3 to 4 applications at 2 - 3 day intervals as infestation warrants. Re-apply immediately after rain. In home gardens, apply 1 to 2 ounces per 50 ft. of row. May be applied up to harvest, at rates directed without exceeding residue tolerances. Application of this product to the tassel region of corn during the pollen shed period will seriously reduce bee population.

BEETS (Roots), BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CAULIFLOWER, HEAD LETTUCE, HORSE RADISH, KOHLRABI, PARSNIPS, RADISH, RUTABAGA, SALSIFY (Roots), TURNIPS (Roots): In home garden, to control Flea Beetles and Harlequin Bugs, apply at the rate of ½ to 1 ounce per 50 feet of row. To control Corn Earworm, Armyworm, Imported Cabbageworm, Diamond-back Moth larvae, Tarnished Plant Bug and Stink Bugs apply 1 to 2 ounces per 50 feet of row.

BEETS (Tops), COLLARDS, CHINESE CABBAGE, DANDELION, ENDIVE (Escarole), KALE LEAF LETTUCE, MUSTARD GREENS, PARSLEY, SALSIFY (Tops), SPINACH, SWISS CHARD, TURNIPS (Tops): In home garden, to control Flea Beetles, Harlequin Bugs, and Leafhoppers apply at the rate of ½ to 1 ounce per 50 feet of row. To control Armyworms, Imported Cabbageworm, Diamondback Moth larvae, Corn Earworm, Tarnished Plant Bug and Stink Bugs apply 1 to 2 ounces per 50 feet of row. For best control of Corn Earworm after lettuce heads begin to form, use 2 ounces per 50 feet of row on a 5 to 7 day schedule.

BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES: To control Japanese beetles, Leafrollers, leafhoppers and raspberry aphid, apply at the rate of 2 ounces per 50 feet of row.

BLUEBERRIES: To control Blueberry Maggot, Cherry and Cranberry fruitworms and Japanese Beetles, apply at the rate of 2 ounces per 50 feet of row. Apply 3 weeks before harvest and repeat 10 days later if necessary.

GRAPES: To control Grape Leaf Folder, Grape Leafhopper and Grape Leaf Skeletonizer, apply at the rate of 1 to 2 ounces per 50 feet of row. Apply just before first brood leaf folder larvae emerge from rolls and as needed for Leafhoppers. To control Grape Berry Moth, Japanese Beetle, June beetle and Red-banded Leafroller, apply at the rate of 2 ounces per 50 feet of row.

ORNAMENTALS: To control Apple Aphid, Bagworm, Birch Leafminer, Blister Beetles, Boxelder Bug, Boxwood Leafminer, Elm Leaf Aphid, Elm Leaf Beetle, Flea Beetles, Japanese Beetle, Lacebugs, Leafhoppers, Leaf Rollers, Oak Leafminers, Orange Tortrix, Periodical Cicada, Plant Bugs, Psyllids, Rose Slug, Rose Aphid, Scale Insects in the crawler stage, Tent Caterpillars, Willow Leaf Beetle and Exposed Thrips, apply thoroughly to the infested plants at first sign of damage and repeat at 7 day intervals or as necessary for good insect control. To obtain scale control apply in spring and early summer when scale crawlers are present.

LAWNS: To control Leafhoppers, Fall Armyworm, and Sod Webworm, apply at the rate of 4 pounds per 1000 square feet. For best results, apply after rain or watering and do not water for at least 2 days after application. Repeat in 2 to 3 weeks if necessary.

CHICKENS, TURKEYS, DUCKS, GEESE, GAME BIRDS AND PIGEONS: LITTER TREATMENT: Apply one pound per 40 square feet to control Northern Fowl Mite, Chicken Mite, Lice, Fleas and Bed Bugs. Use a

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scoop and scatter by hand or apply by hand duster. Avoid contamination of nests, eggs, feeding and watering troughs.

HAND APPLICATIONS TO BIRDS: Use one pound to treat 100 birds by means of a shaker can, squeeze bottle or hand duster to control Northern Fowl Mite, Chicken Mite, Lice and Fleas. Direct dust to vent and fluff areas. Repeat in 4 weeks if necessary. Hand application to birds for Chicken Mite and Fleas is a supplement to litter treatment for control of these pests. For the control of Sticktight Fleas, it is especially important to treat necks and head.

DUST-BATH BOXES: Use 2 1/2 pounds per box for each 50 birds to control Northern Fowl Mite, Chicken Mite, Lice and Fleas. This is a supplement to litter treatment for Chicken Mite and Flea-Control. On ranges, two natural wallows may be substituted for each dust-bath box.

PET INSECT CONTROL

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.

DOGS AND CATS: Against Brown Dog Ticks and Fleas, rub in skin and apply in sleeping quarters weekly. Do not treat kittens under 4 weeks old. Do not treat puppies under 4 weeks old. Do not use on pregnant dogs.

DOG AND CAT QUARTERS: For ticks and fleas, dust liberally in and around sleeping quarters, kennels and dog houses by means of a shaker can, hand or powder dust. Force dust into cracks and crevices. Repeat as necessary.

FORAGE CROPS

PASTURE FORAGE GRASSES, CLOVER, ALFALFA, COWPEAS, PEANUTS, SOYBEANS: Against Thrips, Armyworms, Grasshoppers, and Stink bugs, apply 20 to 30 pounds (no more) per acre when insects appear. Repeat 7 to 14 days later if necessary. Do not apply later than 7 days before harvest on Alfalfa.

TOBACCO: In plant beds: Against Tobacco Flea Beetle apply 1 to 2 pounds per 100 square yards when plants appear. Repeat as needed at 10 to 14 day intervals and just before transplanting. In Fields: Against Homworms and Tobacco Flea Beetles apply 15 to 25 pounds broadcast per acre depending on the size of plants. Good coverage is essential. Use the highest dosage only on large plants and repeat as needed. Heavier applications may cause plant injury. Do not use on Shade Tobacco in combination with parathion.

NOTE: If late applications are necessary, treat immediately after priming rather than before priming. Some phytotoxicity may occur on tender foliage in the presence of rain or high humidity of several days duration following application.

NOTICE: The U.S. Food and Drug Administration has set tolerances for pesticide residues. Crops having residues in excess of their permitted tolerances should not be marketed and to do so may violate state law and will violate Federal law when sold in interstate commerce. Such crops should not be marketed without removal of such excess residue.

IMPORTANT: Read these entire Directions and Conditions of Sale before using this product. **DISCLAIMER:** SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.

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