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769-611

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

NR 4 1997

Subject: R & M Garden & Kennel Dust 5%
EPA Registration No. 769-611
Amendment dated November 19, 1996
Response to Agency letter dated 10/1/96 and
WPS Requirements

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 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. Place the RESIDENTIAL USER SAFETY REQUIREMENTS box in the Directions for Use section of your label directly beneath the AGRICULTURAL USE REQUIREMENTS box.

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.	

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b) You have neglected to add to your label the Directions for Use as outlined in the Agency letter dated 10/1/96. In the Directions for Use section, directly beneath the RESIDENTIAL USER SAFETY REQUIREMENTS box, add the following use directions:

"FOR HOME 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."

c) In the section labeled APPLICATION, delete "5 to" from "repeat on a regular 5 to 7 day schedule..." The minimum application interval is 7 days.

d) In the Directions for Use on COLLARDS, GARDEN BEETS, KALE,....., delete "5. to" from the second to last sentence.

e) In the Directions for Use on CORN, change "2 to 3 day intervals" to "7 day intervals."

f) The Directions for Use for 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: For 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."

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.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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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)

Enclosure

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R & M GARDEN & KENNEL DUST 5%

For use on vegetables, fruits, ornamentals, and lawns.

Also for use on poultry, dogs and cats
for flea, tick & mite control.

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

EPA Reg. No. 769-611

EPA Est. No. 769-GA-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side Panel For Additional Precautionary Statements

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.

PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals CAUTION

May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling.

PERSONAL PROTECTIVE EQUIPMENT

- Applicators and other handlers must wear:
- *Long-sleeved shirt and long pants.
- *Waterproof gloves.
- *Shoes plus socks.

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 4 1997

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

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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. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of waste. -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.

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.

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

Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl label.

CAUTION: Some phytotoxicity may occur on tender foliage in the presence of rain or high humidity of several days' duration following application.

PREHARVEST USE LIMITATION: This product can be used up to and including the day of harvest on all crops listed except on strawberries allow one day between application and harvest, and on broccoli, Brussels

sprouts, cabbage, cauliflower, cowpeas, head lettuce, garden beets (roots), kohrabi, radishes, rutabagas and turnips (roots), allow 3 days between application and harvest; and on blackberries, boysenberries, dewberries, grapes, loganberries and raspberries, allow 7 days; and between application to poultry and game birds or premise treatment and slaughter of birds, allow 7 days; on collards, garden beets (tops), kale, leaf lettuce, mustard greens, spinach and turnips (tops), allow 14 days between application and harvest.

APPLICATION: Begin applications when insect or damage is first observed and repeat on a regular 5 to 7 day schedule or as necessary for good insect control.

VEGETABLES

BEANS: To control Mexican bean beetle, bean leaf beetle, cucumber beetles, leafhoppers, flea beetles, Japanese beetles and corn earworm, apply at the rate of 20 pounds per acre or 1 ounce per 50 feet of row. Where Mexican bean beetle is the only problem, a rate of 10 pounds per acre is sufficient. To control lygus bug, stink bug and Lima bean pod borer, apply 40 pounds per acre.

CABBAGE, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER, KOHLRABI: To control flea beetles and harlequin bugs, apply at the rate of 10 to 20 pounds per acre. To control corn earworm, armyworm, imported cabbageworm, diamond-back moth larvae, apply 20 to 40 pounds per acre or 1 to 2 ounces to 50 feet of row. Will not control cabbage loopers.

COLLARDS, GARDEN BEETS, KALE, LETTUCE, MUSTARD GREENS, RADISHES, RUTABAGAS, SPINACH, TURNIPS: To control flea beetles, harlequin bug and leafhoppers, apply at the rate of 10 to 20 pounds per acre. To control armyworms, imported cabbageworm, diamond-back moth larvae, corn earworm, tarnished plant bug and stink bugs, apply 20 to 40 pounds per acre or 1 to 2 ounces to 50 feet of row. For best control of corn earworm after lettuce heads begin to form, use 40 pounds per acre in a 5 to 7 day schedule. Will not control cabbage looper.

CUCUMBERS, SQUASH, CANTALOUPE, PUMPKINS, MELONS: To control pickleworm, melonworms, cucumber beetles, squash bug, flea beetles, apply at the rate of 20 pounds per acre or 1 ounce to 50 feet or row.

CORN: To control corn earworm, European corn borer, fall armyworm, sap beetles, and Japanese beetles, apply at the rate of 30 to 40 pounds per acre or 2 ounces to 50 feet or row. For budworm damage in the whorl, apply to entire plant and repeat as necessary. For insects attacking silks and ears, apply at 2 to 3 day intervals starting when first silks appear and continuing until silks begin to dry. Three or more applications may be required depending upon severity of infestation.

CARROTS: To control flea beetles, leafhoppers, spittlebugs, lygus and stink bugs, apply at the rate of 20 to 40 pounds per acre or 1 to 2 ounces to 50 feet of row.

OKRA: To control corn earworm and stink bugs, apply at the rate of 20 to 40 pounds per acre or 1 to 2 ounces to 50 feet of row.

TOMATO, EGGPLANT, PEPPER: To control tomato fruitworm, fall armyworm, flea beetles and leafhoppers, apply at the rate of 20 pounds per acre or 1 ounce to 50 feet of row. For control of tomato hornworm, European corn borer and stink bugs, apply at the rate of 20 to 40 pounds per acre.

POTATO: To control Colorado potato beetle, apply at the rate of 10 pounds per acre. For control of leafhoppers and flea beetles, apply at 20 pounds and for lygus bugs, apply at 40 pounds per acre.

SMALL FRUIT

BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES: To control Japanese beetles, leafrollers, leafhoppers and raspberry aphid, apply at the rate of 40 pounds per acre.

BLUEBERRIES: To control blueberry maggot, cherry and cranberry fruitworms and Japanese beetles, apply at the rate of 30 to 40 pounds per acre. 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 20 to 40 pounds per acre. 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 40 pounds per acre.

STRAWBERRIES: To control meadow spittlebug, strawberry leafroller and strawberry weevil apply at the rate of 20 to 40 pounds per acre.

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.

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.

LAWNS

To control fleas, ticks, 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.

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POULTRY INSECT CONTROL

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 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: For ticks and fleas, dust liberally over the entire animal, avoiding the eyes. Rub thoroughly into the skin. Comb out dead ticks a few hours after treatment. Repeat at weekly intervals if needed. Avoid treatment of animals less than four weeks of age. Do not use on pregnant dogs.

KENNELS

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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store pesticide in original container and place in a locked storage area.

Disposal: Do not reuse container. Wrap and discard in trash. Wastes resulting from this product may be disposed of on site or at an approved waste disposal facility.

This container is sold by weight, NOT by volume. You can be assured of the proper weight even though some settling of contents normally occurs during transportation and handling.

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.

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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.

NOTICE: Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.

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

Net Contents ___ oz.

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