

PM-19

Reg # 769-612

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

FEB 26 1997

Subject: R & M Garden & Kennel Dust 10%  
EPA Registration No. 769-612  
Amendment dated November 6, 1996  
Response to Agency letter dated 10/1/96 and  
Addition of WPS language

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 Environmental Hazards section, the second sentence in the paragraph should read as follows: "Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark."

b) Correct the spelling of "strawberries" in the paragraph labeled PREHARVEST USE LIMITATION.

c) In the paragraph labeled APPLICATION, change "repeat on a regular 5 to 7 day schedule" to "Do not repeat application more than once a week."

d) In the Directions for Use on COLLARDS, GARDEN BEETS, etc..., change "5 to 7 day schedule" to "7 day schedule."

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

f) The Agency letter dated 10/1/96 specifies that the user safety requirements should be located in a separate box titled USER SAFETY REQUIREMENTS. On your label, this language is found in the Non-Agricultural Use Requirements box. Please remove the language required in our letter dated 10/1/96 from that box and rearrange it as follows. In addition, because your product is intended for use in agricultural applications as well as by the homeowner, please add the word "RESIDENTIAL" to the USER SAFETY REQUIREMENT box to avoid confusion with Worker Protection Standard requirements.

SYMBOL	SURNAME	DATE	CONCURRENCES				

B Edwards A: 769/612.1 2/17/97

**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.

g) Because this product has agricultural and residential uses, place the heading "DIRECTIONS FOR RESIDENTIAL USE" directly above the paragraph "Wearing household latex or rubber gloves....on this or other carbaryl labels."

h) In the Directions for Use on DOGS AND CATS, delete the sentence "Avoid treatment of animals less than four weeks of age." This contradicts the "12 weeks" instructions in the previous paragraph as required by our letter dated 10/1/96.

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)

Enclosure

3910

# SureCo GARDEN & KENNEL DUST 10%

CONTROLS INSECTS ON  
VEGETABLES - PETS - LAWNS - AND ORNAMENTALS

**ACTIVE INGREDIENT:**

Carbaryl (1-naphthyl N-methylcarbamate) ..... 10.0%

**INERT INGREDIENTS:** ..... 90.0%

Total: ..... 100.0%

EPA Reg. No. 769-612

EPA Est. No. 769-GA-1

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Back Panel for Additional Precautionary Statements

### STATEMENT OF PRACTICAL TREATMENT

**IF SWALLOWED:** Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

**IF INHALED:** Remove victim to fresh air.

**IF IN EYES:** Flush with 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: \_\_\_\_\_

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 26 1997

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

769-612

96 NOV 15 AM 1:19

RECD EPA/PPDPD1

Pg 1 of 8

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans & Domestic Animals**  
**CAUTION**

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

**PERSONAL PROTECTIVE EQUIPMENT**

Applicators and other handlers must wear: Long-sleeved shirt and long pants, waterproof gloves and 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.

*or areas*  
**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. Do not contaminate water when disposing of equipment washwaters. 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. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

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 regulations.

### 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.

**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, grapes, dewberries, 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 10 pounds per acre or ounce per 100 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 20 pounds per acre.

**CABBAGE, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER, KOHLRABI:** To control flea beetles and harlequin bugs, apply at the rate of 10 pounds per acre. To control corn earworm, armyworm, imported cabbageworm, diamond-back moth larvae, apply 10 to 20 pounds per acre or 1 to 2 ounces to 100 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 pounds per acre. To control armyworms, imported cabbageworm, diamond-back moth larvae, corn earworm, tarnished plant bug and stink bugs, apply 10 to 20 pounds per acre or 1 to 2 ounces to 100 feet of row. For best control of corn earworm after lettuce heads begin to form, use 20 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 10 pounds per acre or 1 ounce to 100 feet or row.

**CORN:** To control corn earworm, European corn borer, fall armyworm, sap beetles, and Japanese beetles, apply at the rate of 15 to 20 pounds per acre or 2 ounces to 100 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 10 to 20 pounds per acre or 1 to 2 ounces to 100 feet of row.

**OKRA:** To control corn earworm and stink bugs, apply at the rate of 10 to 20 pounds per acre or 1 to 2 ounces to 100 feet of row.

**TOMATO, EGGPLANT, PEPPER:** To control tomato fruitworm, fall armyworm, flea beetles and leafhoppers, apply at the rate of 10 pounds per acre or 1 ounce to 100 feet of row. For control of tomato hornworm, European corn borer and stink bugs, apply at the rate of 10 to 20 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 10 pounds and for lygus bugs, apply at 20 pounds per acre.

**SMALL FRUIT**

**BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES:** To control Japanese beetles, leafrollers, leafhoppers and raspberry aphid, apply at the rate of 20 pounds per acre.

**BLUEBERRIES:** To control blueberry maggot, cherry and cranberry fruitworms and Japanese beetles, apply at the rate of 15 to 20 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 10 to 20 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 20 pounds per acre.

**STRAWBERRIES:** To control meadow spittlebug, strawberry leafroller and strawberry weevil apply at the rate of 10 to 20 pounds per acre.

**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. Do not allow children or pets to contact treated area until dust has settled.

USER SAFETY REQ box

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

DIRECTIONS FOR RESIDENTIAL USE.

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. Apply when insects or their damage appear. Foliage should be dry before dust is applied. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl label(s).

**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 fleas, ticks, leafhoppers, fall armyworm, and sod webworm, apply at the rate of 2 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.

**EARWIGS**

This material is effective in controlling earwigs and when properly used will reduce the number gaining entrance to homes and buildings. Apply heavily at the rate of 1 pound to 150 linear feet completely around the foundation wall of buildings. The material should be applied heavily in a band 3 to 4 inches wide using a shaker-type can. Earwigs breed over wide areas around yards and fields and are driven by cold weather to seek shelter in warm buildings. As they move along the foundation wall seeking entrance, they come in contact with the treated barrier and are killed. Be sure to treat in front of all steps and other entrance ways as well as along the foundation wall. Treat also around refuse piles, lumber, mulch and other areas in the yard offering areas of concealment to earwigs. Repeat application in 10 days or when earwigs become troublesome. If the dust barrier is washed away by rain, it should be replaced with a new application if earwigs are still a problem.

**POULTRY INSECT CONTROL**

**CHICKENS, TURKEYS, DUCKS, GEESE, GAME BIRDS AND PIGEONS:**  
**LITTER TREATMENT** - Apply 1/2 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 1/2 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 100 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 the 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. 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.