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JAN 14 1997

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

Subject: SMCP Sevin 10% Dust
EPA Registration No. 769-665
Submission dated October 15, 1996
Response to Carbaryl Label Requirements 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 order to avoid confusion with WPS directions, please remove the following language from the Non-Agricultural Use Requirements box and put it in it's own box labeled "Residential User Safety Requirements" as follows:

RESIDENTIAL USER SAFETY REQUIREMENTS
<ul style="list-style-type: none">• 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.

Place the **RESIDENTIAL USER SAFETY REQUIREMENTS** box directly beneath the Non-Agricultural Use Requirements box.

b) Several statements in the PEST INSECT CONTROL section of your draft label are either redundant or incorrect because you did not delete the old language from the label. The PEST INSECT CONTROL section should read as follows:

"PEST INSECT CONTROL (TICKS & FLEAS)

DOGS: 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. Comb out dead ticks a few hours after treatment. 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. Repeat at weekly intervals if needed.

DOG QUARTERS: Dust bedding and doghouse using a shaker can or other dust applicator. Force dust into cracks and crevices. Repeat as necessary."

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. 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							
SURNAME							
DATE							

SMCP SEVIN[®] brand carbaryl insecticide 10% DUST

Active Ingredient:

Carbaryl (1-Naphthyl N-methylcarbamate	10.0%
Inert Ingredients:	90.0%
Total	100.0%

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

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

This product is an N-methyl carbamate and is a cholinesteraseinhibitor.

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching the 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 eyes with plenty of water.

Note To Physician: Carbaryl is a moderate, reversible cholinesterase inhibitor. Atropine is antidotal. Do not use 2-PAM, opiates or cholinesterase inhibiting drugs.

EPA Reg. No. 769-665

EPA Est. No. 769-GA-1

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

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 14 1997

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

769-665

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.

Note To User: Avoid applying this material during very hot periods of the day.

COTTON

To control boll weevil, bollworm, thrips, flea beetles, cotton fleahopper, cotton leafworm, tarnished plant bug, fall armyworm, cotton leaf perforator, leafrollers, leafhoppers, grasshoppers and for suppression of aphids, apply at the rate of 10 to 20 pounds per acre. For control of salt marsh caterpillar and stink bugs, apply at 20 pounds per acre. Follow state recommendations for frequency and timing of applications. Usually for early season control, 2 to 3 applications should be made at 7 to 10 day intervals at the rate of 8 to 10 pounds per acre. For mid-season control, apply 10 to 15 pounds per acre. Repeat application at 5 day intervals until infestation is brought under control. Usually 4 applications will be necessary. Repeat a series of 4 applications at 5 day intervals if boll weevils reappear in sufficient numbers to cause damage. For late season control, apply at the rate of 15 to 20 pounds per acre at 5 day intervals. Anytime bollworms are a threat, when as many as 4 to 5 small worms and eggs are found per 100 terminals examined, apply at least 15 pounds of dust per acre. Direct the dust downward into the tops of the plants where the worms are hatching. Repeat applications at 5 day intervals until infestation is controlled. Allow 7 days between last application and grazing treated fields or harvesting crop or crop residue for use as feed or bedding for dairy or meat animals.

VEGETABLES

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.

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. To control lygus bug, stink bug and lima bean pod borer, apply 20 pounds per acre.

CABBAGE, COLLARDS, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER, LETTUCE, MUSTARD GREENS, TURNIPS, KOHLRABI AND SPINACH: To control flea beetle and harlequin bug, apply at the rate of 10 pounds per acre. To control corn earworm, armyworm, cabbageworm and small cabbage loopers, apply 10 to 20 pounds per acre.

CUCUMBERS, SQUASH, CANTALOUPE, PUMPKINS, MELONS: To control pickleworm, melonworm, cucumber beetles, squash bug, flea beetles, apply at the rate of 10 pounds per acre.

CORN: To control corn earworm, European corn borer, fall armyworm, sap beetle and Japanese beetles apply at the rate of 15 to 20 pounds per acre. 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 the 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.

LETTUCE: To control flea beetles, harlequin bug, and leafhoppers, apply at the rate of 10 pounds per acre. To control corn earworm, armyworms, cabbage caterpillars, spittlebugs, lygus and stink bugs, apply at the rate of 10 to 20 pounds per acre.

OKRA: To control corn earworm and stink bugs, apply at the rate of 10 to 20 pounds per acre.

TOMATO, EGGPLANT, PEPPERS: To control tomato fruitworm, fall armyworm, flea beetles, and leafhoppers, apply at the rate of 10 pounds per acre. 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, leafhoppers and flea beetles, apply at the rate of 10 pounds and for lygus bugs, apply at 20 pounds per acre.

INTERVAL BEFORE HARVEST: Allow 3 days between application and harvest on broccoli, brussels sprouts, cabbage, cauliflower, kohlrabi, and head lettuce. Allow 14 days on collards, leaf lettuce, mustard greens and turnips. On other vegetables listed on this label, application can be made up to and including the day of harvest.

FORAGE CROPS

APPLICATION: Apply when insects or signs of damage appear and repeat 14 days later if necessary.

ALFALFA, CLOVERS, COWPEAS, PEANUTS AND SOYBEANS: To control Mexican bean beetle, blister beetles, thrips, leafhoppers, three-cornered alfalfa hopper, cucumber beetles, bean leaf beetle, Japanese beetle, alfalfa caterpillar and velvet bean caterpillar, apply at the rate of 10 pounds per acre. To control armyworms, webworms, corn earworm, stink bugs and grasshoppers, apply at the rate of 10 to 15 pounds per acre. Application may be made up to and including the day of harvest. Some leaf injury may occur if applications are made when tender foliage is wet. For alfalfa or cowpea, allow 3 days before grazing or harvest.

RICE, FORAGE GRASS, PASTURE: To control thrips, armyworms, stink bugs and grasshoppers, apply at the rate of 10 to 15 pounds per acre. For optimum thrips control in grasses grown for seed, direct dust to boot. Application may be made the day of harvest to grass and pasture. Allow 14 days

between last application and harvest on rice. Do not use on rice fields in which crayfish and/or catfish is included in the cultural practice.

CORN (Forage and fodder): To control earworm, European corn borer, fall armyworm, sap beetles and Japanese beetles, apply at the rate of 10 to 20 pounds per acre. Application may be made up to within 7 days of harvest.

SORGHUM: (Grain and Forage): To control armyworms, webworms, corn earworms, stink bugs and grasshoppers, apply at the rate of 10 to 20 pounds per acre. Allow 21 days between last application and harvest of grain, no time limit on sorghum forage.

TOBACCO

To control hornworms, bugworms, and flea beetles, apply at the rate of 15 to 25 pounds per acre. Begin applications when worms are small and repeat as necessary for control. Avoid excessive application. For budworm control with a hand duster, direct the dust to the bud and upper leaves of each plant, only 4 to 6 pounds per acre is necessary. Do not apply with cloth bags or apply heavily because plant injury may result.

POULTRY

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 APPLICATION 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 heads.

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, one natural wallow may be substituted for each dust-bath box.

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.

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 the 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 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 or 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 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, limber, 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.

PEST 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: For ticks and fleas, dust over the entire animal, avoiding eyes, and 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. Do not use on puppies under 6 weeks of age.

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

HOME AND GARDEN USE

DIRECTIONS FOR USE: SureGard 10% Sevin Dust is to be used without dilution. 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. 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).

CROPS	INSECTS CONTROLLED	LAST APPLICAT ION ALLOWED BEFORE HARVEST
Asparagus (on Spears) Asparagus (On Ferns & Brush)	Asparagus Beetle. Do not repeat application within 3 days. Asparagus Beetle, Apache Cicada Post-Harvest application	1 Day
Beans	Lygus Bugs, Stink Bugs, Corn Earworm, Leafhoppers, Flea Beetles, Tarnished Plant Bug, Bean Leaf Roller, Mexican Bean Beetle, Bean Leaf Beetle, Western Bean Cutworm, Japanese Beetle, Velvetbean Caterpillar, Armyworms. Do not feed forage to dairy animals or animals being finished for slaughter.	0 Days
Cucumbers, Squash, Cantaloupes, Watermelons	Striped Cucumber Beetle, Spotted Cucumber Beetle, Melonworm, Pickleworm, Squash Bug, Leafhoppers, Flea Beetles	0 Days
Potatoes, Tomatoes, Eggplants, Peppers	Flea Beetles, Armyworms (Fall), Tomato Fruit Worm, Corn Earworm, Tomato Hornworms, Leafhoppers, European Corn Borer, Stink Bugs, Colorado Potato Beetle, Lace Bug, Lygus Bugs	0 Days
Lettuce	Flea Beetles, Stink Bugs, Corn Earworm, Leafhoppers, Armyworms, Armyworms, Harlequin Bug, Spittlebugs, Lygus Bugs	3 Days (Head) 14 Days (Leaf)
Carrots	Flea Beetles, Leafhoppers, Six-spotted Leafhopper, (aster yellow vector), Armyworms, Spittlebugs, Lygus & Stink Bugs	0 Days
Cabbage, Broccoli, Brussels Sprouts, Cauliflower,	Flea Beetles, Harlequin Bug, Corn Earworm, Armyworms	3 Days

Kohlrabi		
Okra	Corn Earworm, Stink Bugs	0 Days
Strawberries	Spittlebugs, Strawberry Leaf Roller, Strawberry Weevil	1 Days
Grapes	Grape Leafhoppers, Grape Leaf Folder, Grape Berry Moth, European Fruit Lacanium, Grape Leaf Skeletonizer, Japanese Beetle, June Beetles, Red-banded Leaf Roller	0 Days

STORAGE AND DISPOSAL

STORAGE: Store pesticide in original container and place in a locked storage area. Opened pesticide containers should be securely resealed prior to storage. Protect from penetration of moisture, excessive heat or cold. Avoid cross-contamination with other pesticides or fertilizers. Use caution when storing pesticides in stacks.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment, then dispose of 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.

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.