



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 23 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

H. R. McLane
AMVAC CHEMICAL CORP.
4100 East Washington Blvd
Los Angeles, CA 90023

Subject: Label Amendment Submission of 12/15/93 in Response to PR Notice 93-7
EPA Reg. No. 5481-195
METALDEHYDE METHIOCARB GRANULES 2-1

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



Recycled/Recyclable
Printed with Soy/Canola ink on paper that
contains at least 50% recycled fiber

File

195

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, (If you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling as amended

AND

- WITHIN one year from date of this acceptance.

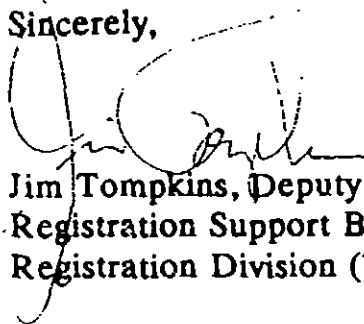
Submit the final printed labeling via the U.S. Postal Service to:

**Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001**

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

RESTRICTED USE PESTICIDE

Due to Avian Toxicity and Fish and Aquatic Organism Toxicity. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicators certification.

METALDEHYDE METHIOCARB GRANULES 2-1

FOR CONTROL OF SNAILS AND SLUGS IN LAWNS AND TURF AREAS, FLOWER GARDENS, GREENHOUSES AND ORNAMENTAL NURSERIES, AROUND HOME FOUNDATIONS. SOIL SURFACE TREATMENT FOR CONTROL OF SNAILS, SLUGS AND SOWBUGS. AS AN AID IN CONTROL OF MILLIPEDES AROUND THE HOME.

ACTIVE INGREDIENTS:

Methiocarb (4-methylthio-3,5 xylylmethylcarbamate) - - - - 1.0%
Metaldehyde(2,4,6,8-tetramethyl-1,3,5,7,tetraoxycyclo-octane) - 2.0%

INERT INGREDIENTS: - - - - - 97.0%

Total 100.0%

*Contains MESUROL® a Register Trademark of the Parent Company of Farbenfabriken Bayer, GmbH, Leverkusen.

EPA NO. 5481-195

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA EST. NO. 5481-CA-1

STATEMENTS OF PRACTICAL TREATMENT

N-Methyl Carbamate: IF SWALLOWED: Call a physician or Poison Control Center immediately. Administer milk or water freely and induce vomiting by giving one dose (1/2 oz. or 15 ml.) of syrup of ipecac. If vomiting does not occur within 30 minutes, administer second dose. If syrup of ipecac is not available, induce vomiting by sticking finger down throat. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. IF ON SKIN: Remove contaminated clothing and wash skin immediately with soap and warm water. IF IN EYES: Wash eyes with plenty of water. Get medical attention if irritation persists. NOTE TO PHYSICIAN: For emergency information call 1-800-228-5635 Ex. 169. Methiocarb is a cholinesterase inhibitor. Atropine is antidotal. THIS PESTICIDE MAY BE FATAL TO DOGS OR OTHER PETS IF EATEN. KEEP PETS OUT OF TREATED AREA. See Side/Back Panel For Additional Precautionary Statements

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DO NOT TAKE INTERNALLY. DO NOT GET IN EYES. DO NOT GET ON SKIN. CAUTION: May be harmful if swallowed inhaled or absorbed through the skin. Do not breathe dust, get in eyes, on skin or on clothing. If poisoning occurs, obtain prompt medical aid

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear long-sleeved shirt and long pants; waterproof gloves; shoes plus socks and a Dust/Mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). Follow manufacturers' 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. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply directly onto plants. Do not allow granules to contaminate edible portions of any food crop. 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, 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). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard. 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. 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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and very highly toxic to birds. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. STORAGE: Store product in original labeled container in a cool, dry, locked place out of reach of children. Keep container tightly closed when not in use. Do not store in direct sunlight. 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or, if allowed by State & local authorities, by burning. If burned stay out of smoke

USE PRECAUTIONS

Read entire label before using. Use only for purposes recommended on this label. Do not allow to drift onto adjoining food, fiber or pasture crops

HOW & WHERE TO USE

For control of Snails, Slugs and Sowbugs in the following areas, use at the rate of 35 to 50 lbs. per acre which is equivalent to 1 lb. granules to treat 880 up to 1,250 sq. ft. of soil surface. Use the higher rate (50 lbs.) for heavy infestations. Apply when first plant damage appears or is anticipated and repeat as needed for control. This application will aid in the control of Millipedes that are present.

FOR USE AS A SOIL TREATMENT

AROUND THE HOME FOUNDATION;
IN DICHONDRA and TURFGRASS AREAS;
FLOWER GARDENS; GROUND COVERS; ORNAMENTAL GREENHOUSES; ORNAMENTAL PLANTINGS;
IN COMMERCIAL ORNAMENTAL NURSERIES

For best Snail, Slug, Sowbug and Millipede control, thoroughly water areas to be treated 12 to 24 hours prior to application. Sprinkle 1 pound of granules uniformly over 1,000 sq. ft. of area. (44 lbs. per acre). Do not place granules in piles. Scatter bait so it is hardly visible on the ground. When making applications special attention should be given to treating areas around plant beds; under greenhouse benches; on dichondra and around building foundations; along edges of flower beds adjacent to flowering or ground cover plants; at the base of fences and walls in shady, protected locations and around susceptible green plants such as Spathiphyllum.

DO NOT USE ON OR AROUND PLANTS GROWN FOR FOOD.

WHEN TO APPLY

Evening application gives most effective control. The effective life of the granules can be increased if watering is avoided for as long as possible after application. Do not apply before heavy rain is imminent. Repeat application as necessary to keep areas free of Snails, Slugs, Sowbugs and Millipedes.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following LIMITED WARRANTY
AMVAC warrants that (a) this product conforms to the chemical description on its label, (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions. There are no express warranties other than those set forth herein. Amvac neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, express or implied. Amvac expressly excludes and disclaims all implied warranties of merchantability, fitness for particular purpose, or any other warranty of quality or performance. This warranty does not extend to, and the user shall be solely responsible for, any loss or damage which results from the use of this product in any manner which is inconsistent with this label's directions, warnings or cautions. User's exclusive remedy and Amvac's sellers' exclusive liability for any claim, loss, damage, or injury resulting from the use or handling of this product, whether or not based in contract, negligence, strict liability in tort, or other wise shall be limited, at Amvac's option, to replacement of, or repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall Amvac or Seller be liable for special, indirect, or consequential damages resulting from the use or handling of this product.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY
TRANSPORTATION: CHEMTREC 1-800-424-9300

MEDICAL: HAZARD INFORMATION SERVICES (H.I.S.) 1-800-228-5635 Ex. 169

(195-WPS/PM / 12-03-93)

Net Weight 50 Pounds
AMVAC CHEMICAL CORPORATION
4100 East Washington Blvd. - Los Angeles, CA 90023 U.S.A.

with COMMENTS
In EPA Letter Dated

FEB 23 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the Pesticide registered under EPA Reg. No. 5481-195