

7401-72

5/23/2003

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 23 2003

Ms. Mary Beth Endres
Brazos Associates, Inc.
2001 Diamond Ridge Drive
Carrollton, TX 75010-4509

Dear Ms. Endres:

Subject: Revised Labeling per PR Notices 2001-1 and 2001-6; Revised CSF
fert•lome® Improved Bug Bait
EPA Registration No. 7401-72
Your Submission Dated October 18, 2001

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following changes before you release the product for shipment bearing the amended labeling:

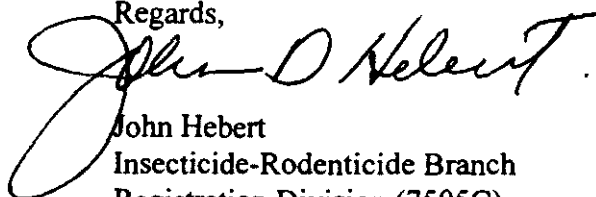
1. You must delete the following from your labeling: "Improved" from the product name; "Effective New Formulation....Control"; "This new and improved formulation"; and any other claim that falsely suggests that your product possesses unique characteristics because of its composition. These types of claims may only be used on the labeling of a product of new composition for a period of 6 months following approval. It appears that some of these claims have been on the labeling for well over 10 years.
2. Under the First Aid heading revise the statement to "Carbaryl is an N-methyl....inhibitor." In the First Aid section you are encouraged to add a company telephone number or toll-free hotline number. You may use the National Pesticide Telecommunications Network (NPTN). See the enclosed pamphlet for more information.
3. Revise the Note to Physician section as follows: "Carbaryl is an N-methyl carbamate the inhibits cholinesterase. Atropine is antidotal. Do not use 2-PAM (pyridene-2-aldoxime methiodide), opiates or cholinesterase inhibiting drugs. Probable mucosal damage may contraindicate the use of gastric lavage."

4. Revise the Precautionary Statements as follows: "May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse. Do not store near or contaminate feed or foodstuffs. Keep children and pets off treated areas. This pesticide may be fatal to dogs or other pets if eaten. Keep pets out of treated areas."
5. Under "How Do You Use It?" the statement "Place bait where these pests stay during daylight hours" is vague and confusing. Are homeowners expected to know where these pests can be found? Either clarify or delete the statement. Also, add "Do not put granules in piles. Always use protective gloves." to this section.
6. Under "Here are the results you may expect" delete the sentence, "By controlling these unsightly.....trails of snails and slugs." This type of claim is inappropriate for a pesticide label and should be deleted.
7. Under the Directions for Use add: "Do not apply to or around food crops."

The confidential statement of formula for the basic formulation dated October 18, 2001 is acceptable. This CSF has been added to your file and supercedes all pervious versions.

Further consideration will be given to your application upon receipt of the above information. If you have any questions, please contact me at (703) 308-6249 or hebert.john@epa.gov.

Regards,



John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505C)

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ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAY 23 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg No

7401-72

[FRONT LABEL PANEL]

ferti•lome®

Improved Bug Bait

- KILLS SNAILS, SLUGS, PILLBUGS, SOWBUGS, EARWIGS AND ANTS
- EFFECTIVE NEW FORMULATION AIDS YOU IN SNAIL AND SLUG CONTROL.
- CONTAINS ATTRACTANT TO LURE SNAILS AND SLUGS TO BAIT.

ACTIVE INGREDIENTS:

Carbaryl: (1-naphthyl N-methylcarbamate)	4.0%
Metaldehyde (2,4,6,8-tetramethyl-1,3,5,7-Tetraoxycyclo-octane)	1.0%

INERT INGREDIENTS: 95.0%

TOTAL: 100.0%

This pesticide may be fatal to dogs or other pets if eaten. Keep pets out of treated area.

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Weight _____

[BACK/SIDE PANEL]

DIRECTIONS FOR USE

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

1. WHAT IS THIS PACKAGE FOR?

This new and improved formulation gives you an effective and economical way to kill snails, slugs, sowbugs, earwigs and ants in your flower beds, shrub beds, around building foundations, patio stones and sidewalks.

2. HOW DO YOU USE IT?

Punch out holes in top of can and sprinkle bait lightly on ground in areas to be treated. Apply at the rate of 1 lb. to cover 500 sq. ft. Apply in late evening as these bugs are mostly late evening and night feeders. Apply around but not against the stems of desirable plants. Place bait where these pests stay during daylight hours.

Bait areas thoroughly at the beginning of the spring planting season. Repeat at 7-10 day intervals or as necessary to maintain control. For best results areas to be treated should be damp. In dry weather water well before baiting.

Snails and slugs migrate extensively. When invasions from adjacent areas are anticipated, a barrier of the bait will aid in control.

3. HERE ARE THE RESULTS YOU MAY EXPECT.

ferti•lome® IMPROVED BUG BAIT, used according to directions, protects your plants from damage by the listed bugs. By controlling these unsightly bugs you remove their messy appearance and the unsightly slime trails of snails and slugs.

STORAGE AND DISPOSAL

STORAGE: Store in original container and place in locked storage area.

DISPOSAL: **If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[BACK/SIDE PANEL CONTINUED]

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

WARNING: Keep out of reach of children and domestic animals. May be fatal if swallowed, absorbed through the skin or inhaled. Avoid contact with skin, eyes and clothing. Wear regular long-sleeved work clothing. Change to clean clothing daily. Wash hands and face before eating. Wash thoroughly after handling.

Do not store near or contaminate feed or feedstuffs. Keep children and pets off treated areas. This pesticide may be fatal to dogs or other pets if eaten.

FIRST AID	
This product is an N-methyl carbamate and is a cholinesterase inhibitor.	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN: Carbaryl is a moderate, reversible, cholinesterase inhibitor. Atropine is an antidote. DO NOT use 2-PAM, opiates or cholinesterase-inhibiting drugs.	

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[BACK/SIDE PANEL CONTINUED]

ENVIRONMENTAL HAZARDS

This product is toxic to birds and wildlife. Birds feeding on treated areas may be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

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

Voluntary Purchasing Groups, Inc.
P.O. Box 460
Bonham, TX 75418

EPA Reg. No. 7401-72
EPA Est. No. 7401-TX-1