UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 2 3 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® Ant Bait

EPA Registration No. 7401-148

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. The phrases on the front panel identifying pests and application sites are not optional text. They must appear on all labels. Delete the site(s), "other similar areas." This is vague and too broad.
- 2. We suggest that you consider a different brand name for your product. Your product is labeled for more pests than "ants."
- 3. We are unaware of other carbaryl-only products labeled for control of snails and slugs. Usually, carbaryl products with molluscide claims also contain metaldehyde as an active ingredient. Please identify other similar carbaryl-only products.
- 4. 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.
- 5. Revise the Note to Physician section as follows: "Carbaryl is an N-methyl carbamate

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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."

- 6. Revise the Precautionary Statements as follows: "Harmful is swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."
- 7. Under Directions for Use/How Do You Use It add the following: "Do not put granules in piles. Always use protective gloves. 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) [FRONT PANEL]

ACCEPTED with COMMENTS In EPA Letter Dated:

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

ferti•lome®

ANT BAIT

[Optional proposed text appears in brackets - the final label may include some or all of the optional text]

[Kills Snails, Slugs, Pillbugs, Ants, Earwigs, Grasshoppers and Millipedes.]
[Ideal For Use On Lawns, Flower Beds, Ornamental Gardens, Around Patios, House Foundations, Garbage Cans and Other Similar Areas.]

ACTIVE INGREDIENT:	
Carbaryl (1-naphthyl N-methylcarbamate)	2.0%
INERT INGREDIENTS:	<u>98.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel For Additional Cautions

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 formulation, developed to kill Snails, Slugs, Pillbugs, Ants, Earwigs, Grasshoppers, and Millipedes, may be used in a broadcast manner.

2. HOW DO YOU USE IT?

Evenly spread bait granules on area to be treated following rates in table below. Repeat in 2-3 weeks if necessary. NOTE: For outdoor use only.

RATE	SQ. FT.	AREA
1 oz.	6	2.5' x 2.5'
2 oz.	12	3' x 4'
4 oz.	25	5' x 5'
8 oz.	50	7' x 7'
1 lb.	100	10' x 10'

3. HERE ARE THE RESULTS YOU MAY EXPECT!

This granular bait formulation, used according to directions, kills listed insects in outdoor area.

STORAGE AND DISPOSAL

STORAGE: Keep out of reach of children and pets. Store in original containers only. Store in cool, dry place and avoid excess heat.

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.

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.

[BACK/SIDE PANEL CONTINUED]

FIRST AID This product is an N-methyl carbamate and is a cholinesterase inhibitor.		
If swallowed	 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	 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	 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	 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 going for treatme	container or label with you when calling a poison control center or doctor, or ent.	

NOTE TO PHYSICIAN: Carbaryl is a moderate, reversible, cholinesterase inhibitor. Atropine is an antidote. DO NOT use 2-PAM, opiates or cholinesterase-inhibiting drugs.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic invertebrates. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of wastes.

[BACK/SIDE PANEL CONTINUED]

NOTE: Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Voluntary Purchasing Groups, Inc. warrants this product to conform to the chemical description of the label and for the purposes stated on the label. The limit of any liability incurred shall be the purchase price paid by the user or buyer.

VOLUNTARY PURCHASING GROUPS, INC. P.O. BOX 460 BONHAM, TX 75418

> EPA REG. NO. 7401-148 EPA EST. NO. 7401-TX-1

REVISED: 10-15-01 S:\MAIN\VOLUNTARY PURCHASING GROUPS\LABELS\FERTI-LOME ANT BAIT