



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

JUN 25 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mary Beth Endres
Agent for
Voluntary Purchasing Group
Brazos Associates, Inc.
1806 Auburn Drive
Carrollton, TX 75007-1451

Subject: Label Amendment: Response to Agency's letter of January 24, 2003.
High Yield Carbaryl Garden & Pet Dust
EPA Reg. No. 7401-166
Submissions dated February 12, 2002

Dear Ms. Endres:

The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comments:

- 1) The "For Homeowners Use Only" must be moved from the Directions for Use to under the product name. The statement "Use only on Dogs and Cats" must be deleted from page 2.
- 2) The 7 days retreatment intervals on your label is unacceptable since it is in contradiction with the 30 days prohibition of treating pets with cholinesterase inhibiting pesticides. Revise the retreatment interval to 30 days.

A stamped copy "accepted with comments" of the label is enclosed for your records.

Please submit two (2) copies of the final printed for our records. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Akiva Abramovitch".

Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch
Registration Division (7505C)

[FRONT LABEL PANEL]

Hi-Yield®

10% Carbaryl Garden & Pet Dust

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

- [● Controls Listed Insects on Listed Vegetables, Berries, Grapes, Flowers, Shrubs and Lawns]
- [● Ready To Use 10% Dust]
- [● Kills Listed Insects on Fruits, Vegetables, Ornamentals, [Lawns, Trees and Shrubs]
- [● For Use on Dogs and Cats]

ACTIVE INGREDIENT:

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

OTHER INGREDIENTS: 90.0%

TOTAL: 100.0%

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

KEEP OUT OF REACH OF CHILDREN JUN 25 2003

CAUTION

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

7401-100

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Weight _____

[BACK/SIDE PANEL]

**READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS AND CATS**

DIRECTIONS FOR USE

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

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 upper and lower leaf surfaces with a thin, even film of dust. Apply when insects or their damage first appear. 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. Repeat at 7 to 10 day intervals as necessary for proper insect control. For plants above chest high, consider using a liquid carbaryl product.

FOR HOME OWNER USE ONLY

For residential use on Ornamentals, Flowers, Shrubs, Lawns, Home Garden Vegetables and Pets.

ORNAMENTALS, FLOWERS AND SHRUBS: Roses, Azaleas, Camellias, Gardenias, Chrysanthemums, Rhododendron, Arborvitae, Boxwoods, Junipers, Holly Carnations, Gladiola, Lilac, and Evergreens. To kill Elm Leaf, Rose and Apple Aphids, Rose Slugs, Birch Leaf, Boxwood and Oak Leaf Miners, Mealy Bugs, Leaf Rollers, Plant Lace and Boxelder Bugs, Bagworms, Elm Leaf, blister, Japanese, June and Willow (Crawlers) Orange Tortirix, Mimosa Webworms and Gypsy Moths: Dust lightly to cover upper and lower leaf surfaces with a thin, even film of dust. Apply when insects or their damage first appear. Repeat at 7 to 10 day intervals as necessary for proper insect control.
Do not use on Boston Ivy since injury may occur.

LAWNS: To kill Cinch Bugs, Sod Webworms, (Lawn Moths) Fall Armyworms, Cutworms, Ants, Fleas, Mosquitoes, Earwigs, Leafhoppers, and Millipedes, Apply 2 lbs. per 1000 sq. ft. For best results mow lawn and apply immediately after rain or watering and do not water for at least 2 days after application. Repeat at 2-3 week intervals if necessary. In Florida use 1 lb. per 400 sq. ft. for Chinch Bugs.

IMPORTED FIRE ANTS: For use as a mound treatment to control Imported Fire Ants, apply 1 to 2 ounces of product over and around each fire ant mound. Do not irrigate following application. Lightly disturb mound and immediately treat exposed mound surface. For best results apply early in the morning or late evening hours when ants are least active. Treat new mounds as they appear.

[BACK/SIDE PANEL]

The Pre-Harvest Interval (PHI) indicates the number of days between the last application and harvest. The PHI is listed in the () immediately after each crop heading.

Do not repeat applications more often than every 7 days.

VEGETABLES:

BEANS (3): To kill Mexican Bean, Bean Leaf, Cucumber, Flea and Japanese Beetles, Leafhoppers, Velvet Bean Caterpillar, Western Bean Cutworm, Armyworms, Cutworms, Stink Bugs and Tarnished plant Bugs on Green Beans, Lima Beans, Snap Beans, Cowpeas and Black-Eyed peas. Use 0.25 lbs. per 1000 sq. ft. When Mexican Bean Beetle is the only problem a rate of 0.12 lbs. per 1000 sq ft is sufficient.

CARROTS, HEAD LETTUCE, RADISHES, PARSNIPS, AND TURNIPS (roots): (7) To kill Armyworms, Cabbage worms, Corn Earworms, Tarnished Plant Bugs and Stink Bugs, on Lettuceheads for Corn Earworms. Use 0.12 to 0.5 lbs. per 1000 sq. ft.

ENDIVE, KALE, LEAF LETTUCE, MUSTARD GREENS, SPINACH AND TURNIPS (tops): (14-15) To kill Armyworms, Cabbage Worms, Corn Earworms, Tarnished Plant Bugs and Stink Bugs. Use 0.12 to 0.5 lbs. per 1000 sq. ft.

CUCUMBERS, MELONS, AND SQUASH: (3) To kill Pickleworms, Melon Worms, Cucumber and Flea Beetles, Leafhoppers and Squash Bugs. Avoid excessive applications. Do not use on watermelons in Florida. Use 0.25 lbs. per 1000 sq. ft.

GARDEN PEAS: (3) To kill Leafhoppers, Colorado Potato Beetles, Armyworms, and Grasshoppers. Use 0.12 to 0.25 lbs. per 1000 sq. ft.

POTATO: (7) TOMATO, EGGPLANT, AND PEPPERS: (3) To kill Colorado Potato Beetles, Flea Beetles, Leafhoppers, European Corn Borers, Fall Armyworms, Lace/bugs. Tomato Fruitworms and Hornworms, Tarnished plant Bugs and Stink Bugs. Use 0.12 lbs. per 1000 sq. ft for Colorado Potato Beetles all other insects use 0.25 to 0.5 lbs. per 1000 sq. ft.

OKRA: (3) To kill Corn Earworms and Stink Bugs. Use 0.12 to 0.25 lbs. per 1000 sq. ft.

CABBAGE, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER AND KOHLRABI: (3) To kill Flea Beetles, Harlequin Bugs, Armyworms, Cabbage Worms and Corn Earworms. To avoid possible injury, do not apply when foliage is wet or when rain or excessive humidity is expected during the next 2 days. Use 0.12 to 0.25 lbs. per 1000 sq. ft.

GRAPES: (7) To kill Grape Leaf Folder, Grape Leafhopper and Redbanded Leaf Roller. Use 0.25 to 0.5 lbs. per 1000 sq. ft.

STRAWBERRIES: (7) To kill Meadow Spittle Bug, Strawberry Leaf Toller and Strawberry Weevil. Use 0.25 to 0.5 lbs. per 1000 sq. ft.

Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

[BACK/SIDE PANEL]

DOGS AND CATS: Use only on dogs and cats. Consult a veterinarian before using this product on debilitated, medicated, aged, or nursing animals. To control Fleas, Ticks and Lice. Use product only outside or in a well ventilated area. Wearing household latex or rubber gloves, lightly dust entire animal, avoiding pet's eyes, nose, mouth, genital areas. Apply also to the feet between the toes and on the legs. Rub or brush pet's hair to work dust down to the skin. Do not use this or any pesticide on debilitated, aged, pregnant or nursing animals. Do not use on kittens or puppies under 12 weeks of age. Do not repeat application for 7 days.

Lightly dust bedding and doghouse using a shaker can or other dust applicator. Dust in and around sleeping quarters and all areas where ticks and fleas occur. **DO NOT USE IN HOMES. DO NOT APPLY TO RUGS AND CARPETS AS STAINING MAY OCCUR.**

Do not reapply within 1 week of each treatment.

Sensitivities may occur after using ANY Pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides, or chemicals. However, flea and tick collars may be immediately replaced.

STORAGE AND DISPOSAL

STORAGE: Store in original container and place in a 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.

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

CAUTION: Harmful if swallowed or if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Causes moderate eye irritation. Harmful if inhaled. Avoid breathing dust. Remove contaminated clothing and wash clothing before reuse. Wash thoroughly with soap and water after handling. Keep out of the reach of children and domestic animals. Avoid contamination of food and feed-stuffs. Sensitivities may occur after using ANY Pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Food utensils such as teaspoons & tablespoons should not be used for food purposes after use with pesticides.

[BACK/SIDE PANEL]**USER SAFETY REQUIREMENTS**

- *Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when mixing and 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.

FIRST AID**N-methyl Carbamate**

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. You may also contact 1-800-222-1222 or 1-800-900-4044 for emergency medical treatment information.

NOTE TO PHYSICIANS AND VETERINARIANS: Carbaryl is an N-methyl carbamate that inhibits cholinesterase. Atropine is antidotal. DO NOT use 2-PAM, opiates or cholinesterase-inhibiting drugs.

[BACK/SIDE PANEL]

ENVIRONMENTAL HAZARDS

This pesticide 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 equipment washwaters. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Apply this product only as specified on this label. 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.

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 on 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. 7401-166
EPA Est. No. 7401-TX-1

REVISED: 03-21-03

S:\MAIN\VOLUNTARY PURCHASING GROUPS\LABELS\HY 10% CARBARYL GARDEN & PET DUST