

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 27 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
Hi-Yield® Carbaryl Emulsifiable Concentrate
EPA Registration No. 7401-210
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. 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.
2. 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."
3. Under Environmental Hazards, delete "For terrestrial uses." Your product only has terrestrial uses.
4. Under Vegetable Insect Control qualify corn with "sweet."
5. Under Directions for Use for Watermelons please explain the phrase, "Carbaryl injures watermelons in Florida." Why are only Florida melons affected? If the

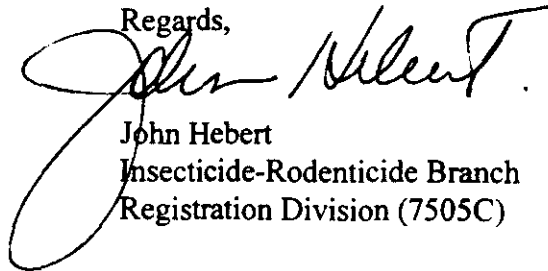
weather conditions in Florida are the basis for this language, watermelons grown in all areas should be included. Either delete the phrase or add a prohibition for application to all watermelons.

The confidential statement of formula for the basic formulation dated October 18, 2001 is not acceptable. We are requesting more information on one of the inert ingredients. Please refer to the enclosed July 18, 2002 product chemistry review. If the manufacturer of the inert ingredient contacts us directly, please have them reference the product name and registration number.

The new primary product name, "Hi-Yield® Carbaryl Emulsifiable Concentrate" is acceptable.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy is enclosed for your records. If you have any questions, please contact me at (703) 308-6249 or hebert.john@epa.gov.

Regards,

A handwritten signature in black ink, appearing to read "John Hebert", is written over the typed name and title.

John Hebert

Insecticide-Rodenticide Branch
Registration Division (7505C)

3/8

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAY 27 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
7401-210

[FRONT LABEL PANEL]

Hi-Yield®

CARBARYL EMULSIFIABLE

CONCENTRATE

(Contains 2 lbs. Carbaryl per gallon)

• For Use On Home Vegetable Gardens

ACTIVE INGREDIENT:

Carbaryl (1-naphthyl N-Methylcarbamate) 25.0%

INERT INGREDIENTS: 75.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back/Side Label Panel For Additional Precautionary Statements

NET WEIGHT _____ LBS.

[BACK/SIDE LABEL PANEL]

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

Harmful if swallowed. Wash thoroughly with soap and water after handling. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Harmful if inhaled. Avoid breathing spray mist. Remove contaminated clothing and wash clothing before reuse. Causes moderate eye irritation. Keep out of reach of children and pets.

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.	

[BACK/SIDE LABEL PANEL CONTINUED]**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic and estuarine invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning equipment or disposal of wastes. 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. Do not apply when weather conditions favor drift from the area treated.

DIRECTIONS FOR USE

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

Read the entire label before using this product.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes and being grown in home gardens.

Apply when air is calm to avoid drift and contact with eyes and skin. Start spraying at the farthest corner of the treatment area and work backward to avoid contact with wet surfaces. Allow spray to dry in treated areas before reentering. Subsequent planting of food or feed crops in treated soil must be made with crops on this or other carbaryl labels.

VEGETABLE INSECT CONTROL

Recommended dosages refer to ounces of CARBARYL EMULSIFIABLE CONCENTRATE in 1 gallon water per 1,000 square feet. When a dose range is indicated use lower rate on young plants; higher rate on mature plants. Use sufficient spray gallonage to obtain full coverage. Keep spray mixture well agitated. Apply when insects or their damage appear. Repeat at 7-10 day intervals or as necessary unless shorter interval is specified below. On vegetables intervals in days between application and harvest of crop that must be observed are indicated in () parenthesis after each crop heading.

CORN (2): Use 3 ozs. for corn earworm, corn rootworm adults, European Corn borer, fall armyworms, flea beetles, Japanese beetle, Sap beetles and leafhoppers. For larvae in whorl (budworm damage) and foliage feeders, apply to entire plant. Repeat as necessary. For insects attacking silks and ears, apply at least every 3 days starting when first silks appear and continuing until silks begin to dry. Three or more applications may be required depending on severity of infestations; timing and food coverage are absolutely essential for effective control. Application of this product to the tassel region of corn during the pollen shed period will seriously reduce bee population.

6/8

[BACK/SIDE LABEL PANEL CONTINUED]

BEANS [succulents (3), dried (21)]: (Green beans, Lima beans, snap beans, cowpeas and blackeyed peas). Use 9/16 ozs. for Mexican bean beetle. Use 1 1/8 ozs. for bean leaf beetle, cucumber beetles, flea beetles, Japanese beetle, leafhoppers, velvet bean caterpillar and Eastern bean cutworm. Use 1 1/8 - 1 3/4 ozs. for armyworms, cutworms, corn earworms, stink bugs and tarnished plant bug. In California, use 2 1/4 ozs. for corn earworm, lima bean pod borer, lygus and stink bugs.

ASPARAGUS (1): Use 3/4 - 1 1/2 ozs. for asparagus beetle on spears. Apply during cutting season. Do not apply more than once every 3 days. Use 1 1/2 - 3 oz. for asparagus beetle and Apache cicada. Apply as post harvest application to ferns and brush growth.

CARROTS (7), CHINESE CABBAGE (14), COLLARDS (14), DANDELION (14), ENDIVE (Escarole) (14), GARDEN BEET TOPS (14), GARDEN BEET ROOTS (7), HORSERADISH (7), KALE (14), LETTUCE Leaf (14), LETTUCE Head (14-15), MUSTARD GREENS (14), PARSLEY (14), PARSNIPS (7), RADISHES (7), RUTABAGAS (7), SALSIFY Tops (14), SALSIFY Roots (7), SPINACH (14), SWISS CHARD (14), TURNIP Tops (14), and TURNIP Roots (7); Use 3/4 - 1 1/2 oz. per 1,000 sq. ft. for flea beetles, harlequin bug and leaf hoppers. To control six-spotted leafhopper (aster yellow vector) apply 1 1/2 - 2 1/4 oz. per 1,000 sq. ft. in a 7 day schedule. Use 1 1/2 - 3 oz. per 1,000 sq. ft. for armyworms, imported cabbage worm, corn earworm, tarnished plant bug and stink bugs. For optimum control of corn earworm after lettuce heads begin to form, use 3 ozs. in a 7 day schedule. To avoid possible injury to lettuce, do not apply when foliage is wet or when rain or excessive humidity is expected during the next 2 days. When cabbage looper is the principal problem, use an alternative pesticide that is specifically recommended. For control of small cabbage loopers in home gardens or in commercial plantings after edible portions begin to form, use Carbaryl in a 7 day schedule.

CUCUMBER (3), MELONS (3), PUMPKIN (3), SQUASH (3): Use 3/4 - 1 1/2 oz. quarts for pickle worm and melonworm; 1 1/2 ozs. for cucumber beetles, flea beetles, leafhoppers and squash bugs. Avoid excessive applications. To avoid possible injury on tender foliage, do not apply when foliage is wet or when rain or excessive humidity is expected during the next 2 days. Carbaryl injures watermelons in Florida.

GARDEN PEAS (3): Use 1 1/8 ozs. for leafhoppers, Colorado potato beetle. For Colorado potato beetle control apply to weeds in fields of garden peas to help prevent insect contamination in processed peas. Use Use 1 1/8 - 1 3/4 ozs. for armyworms and grasshoppers. Repeat treatment every 7 days.

8/8

[BACK/SIDE LABEL PANEL CONTINUED]

POTATO (7), TOMATO (3), EGG PLANT (3) and PEPPER (3): Use ¼ - 1½ ozs. for Colorado potato beetle, flea beetles and leafhoppers. Use 1 ½ - 3 ozs. for European corn borer, fall armyworm, Lace bugs, tomato fruitworm, tomato hornworm, tarnished plant bugs and stink bugs. Use 3 ozs. for cutworm control on potato, tomato and eggplant.

OKRA (3): Use 1 ½ - 3 ozs for corn earworm and stink bugs. Repeat at 7 day intervals or as necessary.

CABBAGE (3), BROCCOLI (3), BRUSSELS SPROUTS (3), CAULIFLOWER (3) and KOHLRABI (3): Use ¼ - 1½ ozs for flea beetles and harlequin bug. Use 1 ½ - 3 ozs for armyworm, imported cabbage worm and corn earworms. When cabbage looper is the principal problem use an alternative pesticide that is specifically recommended. For control of small cabbage loopers in home gardens or in commercial plantings after edible portions begin to form, use carbaryl in a 7 day schedule.

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.

NOTE: Buyer assumes all risks of use, storage or handling of this product 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, TEXAS 75418

EPA Registration No. 7401-210
EPA Establishment No. 7401-TX-1