

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® Home Garden Bug Bait
EPA Registration No. 7401-265
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:

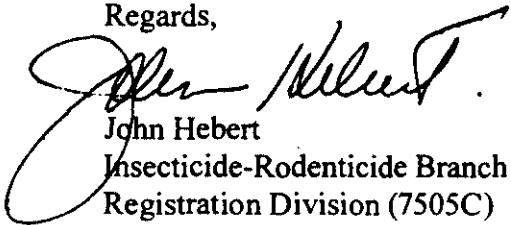
1. Under the First Aid heading revise the statement to "Carbaryl is an N-methyl....inhibitor." In the First Aid section you are encouraged to add a company telephone number or toll-free hotline number. You may use the National Pesticide Telecommunications Network (NPTN). See the enclosed pamphlet for more information.
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: "Harmful if swallowed, 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. Wear long sleeved shirt....after use"

5. Under "How Do You Use It" add the following: "Scatter the granules in groundcovers and lawns and on soil surfaces around plants. Do not apply to foliage or edible parts of plants."
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.

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.

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,



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

[FRONT LABEL PANEL]

ACCEPTED
with COMMENTS
In EPA Letter Dated:

3/8

MAY 23 2003

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

7401-265

ferti•lome®

Home Garden

**BUG
BAIT**

- Kills Snails, Slugs, Pillbugs (Sowbugs), Earwigs, Ants, Grasshoppers and Cutworms around Ornamental Shrubs, Flowers and Certain Vegetables.
- 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%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back/Side Panel for Additional Precautionary Statements

Net Weight 13 ozs.

[BACK/SIDE LABEL PANEL]

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

CAUTION

Harmful if swallowed or absorbed through the skin. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling this product. Do not eat, drink or use tobacco while working with this product. Wash hands and face before eating, drinking or using tobacco. Keep out of reach of children and domestic animals.

Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when applying this product. Wash the outside of gloves before removing. Change clothing as soon as possible after use.

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.

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

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 gives you an effective and economical means of killing snails, slugs, pillbugs, (sowbugs), earwigs, ants and cutworms in your shrub and flower beds, vegetable garden, around building foundations, patio stones and sidewalks.

2. HOW DO YOU USE IT?

Shrubs and flower beds, Around Buildings, Patios and Sidewalks: Apply bait to soil around plants, but not directly on stems, trunks or foliage. Sprinkle bait lightly on ground in areas to be treated, preferably in the late evening because these pests are mostly late evening and night feeders.

Also apply bait where pests hide during the day. Do not apply in piles. Make application in early spring and repeat as necessary to maintain control, but not more often than every 7 days or as indicated below for listed vegetables and fruit. For best results, areas to be treated should be damp; if necessary water prior to application of bait.

Snails and slugs migrate extensively! Migration from infested areas may be prevented by baiting a barrier from the adjacent infested areas.

VEGETABLES: To kill Armyworms, Cutworms, Grasshoppers, Crickets, Darkling ground Beetles and Pillbugs (Sowbugs):

[BACK/SIDE LABEL PANEL CONTINUED]

Commodity	Use Rate
Tomato, Pepper, Eggplant	Do not apply more than 1 $\frac{3}{4}$ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 7 $\frac{1}{4}$ ozs. (8 lb ai/acre/crop). Retreatment interval = 7 days PHI = 3 days Total number of applications/crop can be 7 (some of which must be at lower than maximum single application rate)
Potato	Do not apply more than 1 $\frac{3}{4}$ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 5 $\frac{1}{2}$ ozs. (6 lb ai/acre/crop). Retreatment interval = 7 days PHI = 7 days Total number of applications/crop can be 6 (some of which must be at lower than maximum single application rate)
Corn (field and pop)	Do not apply more than 1 $\frac{3}{4}$ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 7 $\frac{1}{4}$ ozs. (8 lb ai/acre/crop). Retreatment interval = 14 days PHI = 14 days (forage, silage) PHI = 48 days (grain, fodder)
Corn (sweet)	Do not apply more than 1 $\frac{3}{4}$ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 14 $\frac{2}{3}$ ozs. (16 lb ai/acre/crop). Retreatment interval = 3 days PHI = 2 days (ears) PHI = 14 days (forage) PHI = 48 days (fodder)

<p>Carrot, Horseradish, Parsnip, Beets (roots), Rutabaga, Turnips (roots), Radish</p>	<p>Do not apply more than 1 ¾ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 5 ½ ozs. (6 lb ai/acre/crop). Retreatment interval = 7 days PHI = 7 days Total number of applications/crop can be 6 (some of which must be at lower than maximum single application rate)</p>
<p>Beans, fresh and dried (snap, navy and kidney); pea, fresh and dried; cowpea, lentil</p>	<p>Do not apply more than 1 ⅓ ozs. of this product to cover 100 sq. ft. (1.5 lb ai/acre/application). Maximum seasonal application rate of 5 ½ ozs. (6 lb ai/acre/crop). Retreatment interval = 7 days PHI = 3 days (succulents) PHI = 21 days (dried) PHI = 14 days (forage) PHI = 21 days (hay)</p>
<p>Brussels sprouts, Broccoli, Cabbage, Cauliflower, Collards, Kale</p>	<p>Do not apply more than 1 ¾ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 5 ½ ozs. (6 lb ai/acre/crop). Retreatment interval = 7 days PHI = 3 days (Brussels sprouts, broccoli, cabbage, cauliflower) PHI = 14 days (Kale, collards) Total number of applications/crop can be 4 (some of which must be at lower than maximum single application rate)</p>
<p>Lettuce, head and leaf; endive, Spinach, Swiss chard</p>	<p>Do not apply more than 1 ¾ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 5 ½ ozs. (6 lb ai/acre/crop). Retreatment interval = 7 days PHI = 14 to 15 days Total number of applications/crop can be 6 (some of which must be at lower than maximum single application rate)</p>

Strawberry	Do not apply more than 1 ¼ ozs. of this product to cover 100 sq. ft. (2 lb ai/acre/application). Maximum seasonal application rate of 9 ozs. (10 lb ai/acre/crop). Retreatment interval = 7 days PHI = 7 days
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3. **HERE ARE THE RESULTS YOU MAY EXPECT!**
 Protection from listed, damaging bug in Home Gardens. Control of snails and slugs; removes the unsightly slime trail left by these pests.

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. 7401-265
 EPA Establishment No. 7401-TX-1