Rey # 740/-386

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APR 0 2 1997

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

Subject:

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ferti-lome Gypsy Moth Japanese Beetle & Pine Tip Moth Killer

EPA Registration No. 7401-386

Amendment dated December 18, 1996 Response to Agency letter dated 10/1/96

Dear Mr. Smith:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

- 1. Make the following changes to your label:
 - a) Because your product to be used as a liquid spray, the USER SAFETY REQUIREMENTS box should read as follows (refer to Agency letter dated 10/1/96; page 3). Change the USER SAFETY REQUIREMENTS box to:

USER SAFETY REQUIREMENTS

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

Wear a hat and eye protection when making overhead applications.

Remove clothing immediately if pesticide soaks clothing. 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 sprays have dried.

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b) Because this product is used as a liquid spray, the Directions for Use should read as follows.

"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. For trees taller than 10 feet, consider hiring a licensed professional. Spray thoroughly to wet upper and lower leaf surfaces, stems and branches. Do not repeat applications more than once a week."

Delete the paragraph on page 2 "Wearing household latex or rubber gloves...Do not repeat application more than once a week" and place the paragraph shown above in the section of your label marked "2. HOW DO YOU USE IT?"

- c) In the ENVIRONMENTAL HAZARDS statement, change the word "tox" to "toxic" in the first sentence.
- 2. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

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Dennis H. Edwards, Jr. Product Manager (19) Insecticide-Rodenticide Branch Registration Division (7505C) ferti-lome (R)

Gypsy Moth Japanese Beetle & Pine Tip Moth Killer

- * Kills Gypsy moths, Japanese Beetles & Pine Tip Moths on Roses, Flowers, Shrubs & Shade Trees
- * Kills Other Listed Insects on Fruit Trees & Vegetables.
- * 2 Tablespoons Makes 1 Gallon of Spray
- * 1 Pint Makes 16 Gallons of Spray (8 ounces makes 8 gallons of spray) (1 quart makes 32 gallons of spray)

ACTIVE INGREDIENT:

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

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ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 0 2 1997

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

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(3.

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.
READ ENTIRE LABEL BEFORE EACH USE

USER SAFETY REQUIREMENTS

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

* Do not allow children or pets to contact treated area until dust

has settled.

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 air is calm to avoid drift and contact witheyes and skin. Start applying at the farthest corner of the treatment area and work back-bard to avoid contact wit dusted surfaces. Allow dust to settle in treated areas before reentering.

For plants above chest high, cosider using a liquid carbaryl product. Do not repeat application more than once a week.

BEST AVAILABLE COPY

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(Back 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 product provides an easy and effective method for killing Gypsy Moths, Japanese Beetles, Pine Tip Moths and many other destructive insects on Roses, Flowers, Shrubs, Shade Trees, Fruit Trees and Vegetables.
- 2. HOW DO YOU USE IT?

Shake well before using. Mix 2 tablespoonsful (loz.) per gallon of water or l pint in 16 gallons of water. Apply to wet all exposed plant parts. May be used in all types of sprayers.

ROSES, FLOWERS, SHRUBS, SHADETREES: For Japanese Beetles, Gypsy Moths, Pint Tip Moths, Aphids, Bagworms, Elm Leaf Beetle, certain Leaf miners, Rose Slugs, Periodical Cicada (17 year locust), Scale Insects, Tent Caterpillars, Blister Beetles, Leafrollers, Exposed Trips - Spray when insects or their damage appear. Repeat weekly or as necessary. Do not use on Boston Ivy or Virginia Creeper. Injury to tender foliage may occur if plants are wet when treated or humidity is high.

FRUIT TREES(Apples, Pears & Peaches): For Apple Maggot, Plum Curculio, Apple Aphid, Leafrollers, Peach Tree Borers, Oriental Fruit Mota, Codling Moths - Make one application between bud break and bloom, a second application at petal fall, and then re-apply at 3-4 week intervals for 3-4 months as necessary. Apple Maggot - For best control; apply at 10 day intervals. Rosy Apple Aphid - Apply before leaves are curled. NOTE: To avoid foliage injury on McIntosh apples and possible fruit thinning on all varieties of apples, delay use until at least 30 days after bloom. Do not apply within 1 day of harvest.

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3. HERE ARE THE RESULTS YOU MAY EXPECT! When used as directed, this product will kill Gypsy Moths, Japanese Beetles, Pine Tip Moths and other destructive insects and thus help provide for healthier, more attractive Roses, Flowers, Shrubs, Shade Trees, Fruit Trees and Vegetables.

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DISPOSAL

Do not reuse empty container. Wrap container and put in trash collection.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly after handling and before eating or smoking. Avoid contamination of Feed or Foodstuffs. Keep children and pets off treated areas until this material has dried completely.

STATEMENT OF PRACTICAL TREATMENT

IS SWALLOWED: Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Never induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated. IF ON SKIN: Remove contaminated clothing. Wash affected areas with soap and water. IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists. NOTE TO PHYSICIAN: Carbaryl is a moderate, reversible cholinesterase inhibitor. Atropine is antidote.

· VEGETABLES: Mix 2 tablespoonsful (1 oz.) per gallon of water or 1 pint (8 oz. 32 oz.) in 16, (8,32) gallons of water. Apply when air is calm to avoid 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 todry in treated areas before reentering.

Follow Pre-Harvest Intervals (PHI) listed in () following each individual crop or plant. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels. Repeat at 7 to 10 day intervals.

Beans (3), Peas (3), Cabbage (3), Broccoli (3), Brussels Sprouts (3), Cauliflower (3), Radishes (3), Carrots (3), Celery (3), Corn (3), Cucumber (3), Mellons (3), Pumpkin (3), Squash (3), Head Lettuce (3), Leaf Lettuce (14), Okra (3), Potato (3), Tomato (3), Eggplant (3), Pepper (3).

Controls listed insects and others: Assorted Beetles, Armyworms, Cutworms, European Corn Borer, Tarnished Plant Bugs, Leafhoppers, Grasshoppers, Harlequin Bug, Chinch Bugs, Stink Bugs, Tomato Hornworms.

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ENVIRONMENTAL HAZARDS

This product is extremely tox to aquatic invertebrates. For terrestrial uses, do not apply directly to water orwetlands. Do not contaminate water by cleaning of 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.

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 pyer.

Sevin (R) Registered Trademark of Rhone Poulenc for Carbaryl Insecticide.

Voluntary Purchasing Groups Inc.

Bonham, Texas 75418

EPA Reg. no. 7401-386 EPA Est. No. 7401-TX-1

Net Contents Fl. Ozs.