

7401-386

5/27/2003

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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
fert●lome® Gypsy Moth Japanese Beetle & Pine Tip Moth Killer
EPA Registration No. 7401-386
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. Revise the Precautionary Statements as follows: "Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of feed or foodstuffs. Keep children and pets off ... dried completely."
4. Under Environmental Hazards, delete "For terrestrial uses." Your product only has

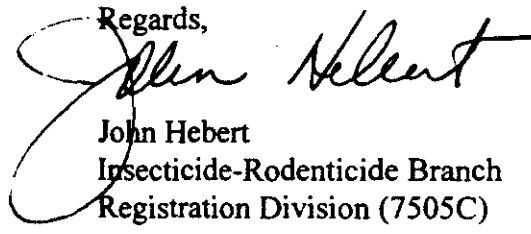
terrestrial uses.

5. Under "Here are the results you may expect" delete "and thus helptrees and vegetables." This type of phrase is vague and too promising and not appropriate for a pesticide label.
6. Under "How do you use it?" revise the phrase to read, "Do not use on trees higher than 10 feet." Also the phrase, "Do not repeat applications more than once a week" contradicts some of the crop specific reapplication directions and must be deleted.

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.

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)

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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.
7401-386

[FRONT PANEL]

ferti•lome®

GYPSY MOTH JAPANESE BEETLE & PINE TIP MOTH KILLER

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

[Kills Gypsy Moths, Japanese Beetles & Pine Tip Moths on Roses, Flowers, Shrubs & Shade Trees]

[Kills Other listed Insects on Home 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:

Carbaryl: 1-naphthyl N-methylcarbamate 13.5%

INERT INGREDIENTS: 86.5%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

NET CONTENTS _____

[BACK PANEL]

DIRECTIONS FOR USE

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
<ul style="list-style-type: none"> * Wear long-sleeved shirt, long pants, shoes plus sock 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.

1. WHAT IS THIS PACKAGE FOR?

This product provides an easy and effective method for killing Gypsy Moths, Japanese Beetles, Pine Tip Months 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 tablespoonful (1 oz.) per gallon of water or 1 pint in 16 gallons of water. Apply to wet all exposed plant parts. May be used in all types of sprayers.

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 fees, 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.

ROSES, FLOWERS, SHRUBS, SHADE TREES: For Japanese Beetles, Gypsy Moths, Pine 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 Thrips - 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.

BACK PANEL CONTINUED]

FRUIT TREES (Apples, Pears & Peaches): For Apple Maggot, Plum Curculio, Apple Aphid, Leafrollers, Peach Tree Borers, Oriental Fruit Moth, 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 to McIntosh apples and possible fruit thinning on all varieties of apples, delay use until at least 30 days after bloom.

Follow Pre-Harvest Intervals (PHI) listed in () following each individual crop or plant. Apples (3), Pears (3) and Peaches (3).

VEGETABLES: Mix 2 tablespoonful (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 to dry 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), Broccoli (3), Brussels Sprouts (3), Cabbage (3), Carrots (3), Cauliflower (3), Celery (3), Corn (3), Cucumber (3), Eggplant (3), Head Lettuce (3), Leaf Lettuce (14), Melons (3), Okra (3), Peas (3), Pepper (3) Potato (3), Pumpkin (3), Radishes (3), Squash (3) and Tomato (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.

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.

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.

BACK PANEL CONTINUED]

**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.

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.	

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BACK PANEL CONTINUED]

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic invertebrates. For terrestrial uses, do not apply directly to water or wetlands. 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.

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. This 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

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EPA EST. NO. 7401-TX-1