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APR 25 1997

Jean Butler
Speer Products, Inc.
P.O. Box 18993
Memphis, TN 38181-0993

Subject: Security Brand 5% Sevin Garden Dust
EPA Registration No. 11715-294
Amendment dated December 12, 1996
Response to Agency letter dated 10/1/96

Dear Ms. Butler:

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) Move the statement "USE ONLY ON DOGS AND CATS" to the section labeled PET INSECT CONTROL.
- b) Move the paragraph "Do not use this product on animals simultaneously or within...consult a veterinarian immediately." to the section labeled PET INSECT CONTROL.
- c) In the APPLICATION section, change "...repeat on a regular 5 to 7 day schedule..." to "...repeat on a 7 day schedule..."
- d) In the Directions for Use on COLLARDS, etc..., change "...on a 5 to 7 day schedule..." to "...on a 7 day schedule..."
- e) In the Directions for Use on CORN, change "...apply at 5 to 7 day intervals..." to "...apply at 7 day intervals..."

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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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,



 Tina E. Levine, Ph.D.
Acting Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

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front panel:

SECURITY BRAND 5 % SEVIN GARDEN DUST

CONTROLS INSECTS ON GARDEN VEGETABLES, LAWNS, ORNAMENTAL,
AND FRUITS

ACTIVE INGREDIENT:

Carbaryl (1-naphthyl N-methylcarbamate).....5.0%

INERT INGREDIENT:.....95.0%

TOTAL.....100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**
See additional precautionary statements on the back panel.

EPA Reg. No. 11715-294

EPA Est. No.

Net Weight: 4 Pounds

Manufactured For:
Speer Products, Inc.
4242 B.F. Goodrich Blvd.
Memphis, TN 38118

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

APR 25 1997

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

11715-294

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back panel:

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. 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. 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.

FIRST AID

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

IF INHALED: Remove victim to fresh air.

IF ON SKIN: Wash with soap and water. Remove any contaminated clothing.

IF IN EYES: Flush eyes with water.

NOTE TO PHYSICIANS AND VETERINARIANS: Carbaryl is a moderate reversible cholinesterase inhibitor. Atropine is antidotal. Do not use 2-PAM, opiates or cholinesterase-inhibiting drugs.

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 hand 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.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to aquatic and estuarine invertebrates. Do not apply directly to water. Do not contaminate water by cleaning of equipment or

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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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

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 both upper and lower leaf surfaces with a thin, even film of dust. 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. For plants above chest height, consider using a liquid carbaryl product. Do not repeat application more than once a week.

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 or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, or lawns and grounds.

PREHARVEST USE LIMITATION

This product can be used up to and including the day of harvest on all crops listed, except on strawberries allow one day between application and harvest; and on broccoli, brussel sprouts, cabbage, cauliflower, cowpeas, head lettuce, garden beets (roots), kohlrabi, radishes, rutabagas and turnip (roots), allow 3 days between application and harvest; and on blackberries, boysenberries, dewberries, loganberries and raspberries, allow 7 days; and between application to poultry and game birds or premise treatment and slaughter of birds, allow 7 days; on collards, garden beets (tops), kale, leaf lettuce, mustard greens, spinach and turnips (tops), allow 14 days between application and harvest.

APPLICATION: Begin applications when insect or damage is first observed and repeat on a regular 5 to 7 day schedule or as necessary for good insect control.

VEGETABLES

BEANS: To control Mexican bean beetle, bean leaf beetle, cucumber beetles, leafhoppers, flea beetles, Japanese beetles and corn earworm, apply at the rate of 1 ounce to 50 feet of row. Where Mexican bean beetle is the only problem, a rate of 1/2 ounce per 50 feet of row is sufficient. To control lygus bug, stink bug and Lima bean pod borer, apply 2 ounce to 50 feet of row.

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GABBAGE, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER AND KOHLRABI: To control flea beetles and harlequin bugs, apply at the rate of 1/2 to 1 ounce to 50 feet of row. To control corn earworm, armyworm, imported cabbageworm, diamond-back moth larvae, apply 1 to 2 ounce to 50 feet of row. Will not control cabbage loopers.

COLLARDS, GARDEN BEETS, KALE, LETTUCE, MUSTARD GREENS, RADISHES, RUTABAGAS, SPINACH, TURNIPS: To control flea beetles, harlequin bug and leafhoppers apply at the rate of 1/2 to 1 ounce per 50 feet of row. To control armyworms, imported cabbageworm, diamond-back moth larvae, corn earworm, tarnished plant bug and stink bugs apply 1 to 2 ounces per 50 feet of row. For best control of corn earworm after lettuce heads begin to form, use 2 ounces per 50 feet of row on a 5 to 7 day schedule. Will not control cabbage loopers.

CUCUMBERS, SQUASH, CANTALOUPE, PUMPKINS, MELONS: To control pickleworm, melonworm, cucumber beetles, squash bug and flea beetles, apply at the rate of 1 ounce to 50 feet of row.

CORN: To control corn earworm, European corn borer, fall armyworm, sap beetles and Japanese beetles, apply at the rate of 2 ounces per 50 feet of row. For budworm damage in the whorl, apply to entire plant and repeat as necessary. For insects attacking silks and ears, apply at ~~2 to 3~~ 5 to 7 day intervals starting when first silks appear and continuing until silks begin to dry. Three or more applications may be required depending upon severity of infestation.

CARROTS: To control flea beetles, leafhoppers, spittlebugs, lygus and stink bugs apply at the rate of 1 to 2 ounces per 50 feet of row.

OKRA: To control corn earworm and stink bugs, apply at the rate of 1 to 2 ounces per 50 feet of row.

TOMATO, EGGPLANT, PEPPER: To control tomato fruitworm, fall armyworm, flea beetles and leafhoppers, apply at the rate of 1 ounce per 50 feet of row. For control of tomato hornworm, European corn borer and stink bugs, apply at the rate of 1 to 2 ounces per 50 feet of row.

POTATO: To control Colorado potato beetle, apply at the rate of 1/2 ounce per 50 feet of row. For control of leafhoppers and flea beetles, apply at 1 ounce and for lygus bugs, apply at 2 ounces per 50 feet of row.

SMALL FRUIT

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BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES: To control Japanese beetles, leafrollers, leafhoppers and raspberry aphid apply at the rate of 2 ounces per 50 feet of row.

BLUEBERRIES: To control blueberry maggot, cherry and cranberry fruitworms and Japanese beetles apply at the rate of 2 ounces per 50 feet of row. Apply 3 weeks before harvest and repeat 10 days later if necessary.

GRAPES: To control grape leaf folder, grape leafhopper and grape leaf skeletonizer apply at the rate of 1 to 2 ounces per 50 feet of row. Apply just before first brood leaf folder larvae emerge from rolls and as needed for leafhoppers. To control grape berry moth, Japanese beetle, June beetle, June beetle and red-banded leaf roller apply at the rate of 2 ounces per 50 feet of row.

STRAWBERRIES: To control meadow spittlebug, strawberry leafroller and strawberry weevil apply at the rate of 1 to 2 ounces per 50 feet of row.

ORNAMENTALS

To control apple aphid, bagworm, birch leafminer, blister beetles, boxelder bug, boxwood leafminer, elm leaf aphid, elm leaf beetle, flea beetles, Japanese beetle, lacebugs, leafhoppers, leafrollers, oak leafminers, orange tortrix, periodical cicada, plant bugs, psyllids, rose slug, rose aphid, scale insects in the crawler state, tent caterpillars, willow leaf beetle and exposed thrips, apply thoroughly to the infested plants at the first sign of damage and repeat at 7 day intervals or as necessary for good insect control. To obtain scale control, apply in spring and early summer when scale crawlers are present.

LAWNS

To control leafhoppers, fall armyworm and sod webworm, apply at the rate of 4 pounds per 1,000 square feet. For best results, apply after rain or watering and do not water for at least 2 days after application. Repeat in 2 or 3 weeks if necessary.

POULTRY INSECT CONTROL

CHICKENS, TURKEYS, DUCKS, GEESE, GAME BIRDS AND PIGEONS:
LITTER TREATMENT - apply one pound per 40 square feet to control Northern fowl mite, chicken mite, lice, fleas and bed bugs. Use a scoop and scatter by hand or apply by hand duster. Avoid contamination of nests, eggs, feeding and watering troughs.

HAND APPLICATIONS TO BIRDS: Use one pound to treat 100 birds by means of a shaker can, squeeze bottle or hand duster to control Northern fowl mite, chicken mite, lice and fleas. Direct dust to vent and fluff areas. Repeat in 4 weeks if necessary. Hand application to birds for chicken mite and fleas is a supplement to litter treatment for control of these pests. For the control of sticktight fleas, it is especially important to treat necks and heads.

DUST-BATH BOXES: Use 2 1/2 pounds per box for each 50 birds to control Northern fowl mite, chicken mite, lice and fleas. This is a supplement to litter treatment for chicken mite and flea control. On ranges, two natural wallows may be substituted for each dust-bath box.

PET INSECT CONTROL

Use product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pet's eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. This product should not be applied by children. Do not use on pregnant dogs. Dust bedding and doghouse using a shaker can or other dust applicator. Do not Reapply Product For One Week. Do Not Use On Puppies or Kittens Under 12 Weeks. Consult a veterinarian before using this product on debilitated, aged, pregnant, medicated, or nursing animals.

DOGS AND CATS: For ticks and fleas, dust liberally over the entire animal, avoiding eyes. Rub thoroughly into the skin. Comb out dead ticks a few hours after treatment. Repeat at weekly intervals if needed. Avoid treatment of animals less than 12 weeks of age. Do not use on pregnant dogs.

DOG AND CAT QUARTERS: For ticks and fleas, dust liberally in and around sleeping quarters, kennels and dog houses by means of a shaker can, hand or power duster. Force dust into cracks and crevices. Repeat as necessary.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Store pesticide in original container and place in a locked storage area. Do not reuse container. Securely wrap original container in several layers of newspaper and discard in the trash.

*Carbaryl may not give satisfactory control of Colorado potato beetles in certain locations including the Northeast and Mid-Atlantic Regions.