



**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

WASHINGTON, D.C. 20460

April 9, 2025

Eliot Harrison  
Agent for Drexel Chemical Company  
Drexel Chemical Company  
1700 Channel Avenue  
Memphis, TN 38106

Subject: Registration Review Label Amendments Incorporating Mitigation from the National Marine Fisheries Services (NMFS) Biological Opinions on the Effects of Carbaryl  
Product Name: Drexel Carbaryl Technical  
EPA Registration Number: 19713-75  
Application Date: 3/21/24  
Decision Number: 595254

Dear Eliot Harrison:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application of the above referenced product in connection with the NMFS' Biological Opinion (BiOp) on the effects of carbaryl on federally listed endangered and threatened species and designated critical habitat in accordance with section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.). The Agency has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or

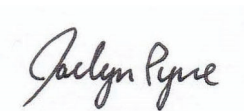
claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

The Agency received the U.S. Fish and Wildlife Service's (FWS) BiOp on the effects of EPA's national registration of carbaryl and posted it on the [website](#) on April 9, 2025. The Agency plans to incorporate and implement this FWS BiOp when issuing the interim decision for carbaryl. EPA will notify the registrants of any need to submit label amendments within 60 days of the issuance of the interim decision.

If you have any questions about this letter, please contact Carolyn Smith at [smith.carolyn@epa.gov](mailto:smith.carolyn@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Jaclyn Pyne". The signature is written in a cursive, flowing style.

Jaclyn Pyne, Team Leader  
Risk Management and Implementation Branch 3  
Pesticide Re-evaluation Division  
Office of Pesticide Programs

Enclosure



**ACCEPTED**  
04/09/2025  
Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 19713-75

# Carbaryl Technical

For Use in Manufacturing, Formulating or Repackaging Only

## ACTIVE INGREDIENT:

Carbaryl (1-naphthyl N-methylcarbamate)..... 99.45%

OTHER INGREDIENTS: ..... 0.55%

TOTAL: ..... 100.00%

**KEEP OUT OF REACH OF CHILDREN**

## WARNING

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle (If you do not understand the label, find someone to explain it to you in detail.)

EPA Reg. No. 19713-75

See FIRST AID Below

EPA Est. No. 19713-XX-XXX

Net Contents: \_\_\_\_\_

### FIRST AID

#### IF SWALLOWED:

- Call a 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 a poison control center or doctor.
- Do not give anything by mouth to an unconscious or convulsing person.

#### IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

#### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

#### IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378

**NOTE TO PHYSICIAN:** Carbaryl is a carbamate insecticide, which is a cholinesterase inhibitor. Overexposure to this substance may cause toxic signs and symptoms due to stimulation of the cholinergic nervous system. These effects of overexposure are spontaneously and rapidly reversible.

Specific treatment consists of parenteral atropine sulfate. Caution should be maintained to prevent overatropinization. Mild cases may be given 1 to 2 mg intramuscularly every 10 minutes until full atropinization has been achieved and repeated thereafter whenever symptoms reappear. Severe cases should be given 2 to 4 mg intravenously every 10 minutes until fully atropinized, then intramuscularly every 30 to 60 minutes to maintain the effect for at least 12 hours. Dosages for children should be appropriately reduced. Complete recovery from overexposure is to be expected within 24 hours.

Narcotics and other sedatives should not be used. Further, drugs like 2-PAM (pyridine-2-aldoxime methiodide) are NOT recommended.

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**WARNING:** May be fatal if swallowed. Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.



Manufactured By:  
**Drexel Chemical Company**  
P.O. Box 13327, Memphis, TN 38113-0327

**SINCE 1972**

The DREXEL logo is a registered trademark of Drexel Chemical Company.

## ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

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

- 1) Except where this product is formulated into pesticide products solely for export (FIFRA section 17 and 40 CFR Part 168, Subpart D), this product may only be formulated into registered end-use products with EPA-approved labeling that contain the language and restrictions per Attachment 4 EPA Summary of Label Changes for Carbaryl Products in the National Marine Fisheries Service nationwide Final Biological Opinion: Carbaryl, dated January 31, 2024. Only for formulation into an insecticide and acaricide for the following uses

### Food/Feed Uses

Asparagus; Brassica leafy vegetables (Crop group 5); Corn (field, pop, sweet); Sorghum; Cucurbit vegetables (Crop group 9); Flax; Alfalfa; Clover; Birdsfoot trefoil; Foliage of legume vegetables (Subgroup 7A); Fruiting vegetables (Crop group 8); Leafy vegetables (Crop group 4); Dried shelled pea and bean (except soybean) Subgroup 6C; Edible-podded legume vegetables (Subgroup 6A); Soybeans; Okra; Grasses; Peanuts, Prickly pear cactus; Rangeland; Root and Tuber vegetables including Sugarbeet and Sweet potato (Crop group 1); Leaves of root and tuber vegetables (Crop group 2); Small fruit and berries – Bushberry (Subgroup 13-B), Caneberry (Subgroup 13-A), Cranberry, Grapes, Strawberry; Sunflower; Tobacco; Tree fruits (Citrus fruits - Crop group 10, Olives, Pome fruits – Crop group 11, Stone fruits – Crop group 12); Tree nuts (Crop group 14); Pistachio; Oyster beds; Vegetable transplants (outdoor only).

### Noncropland Uses

Conservation Reserve Program Acreage, Set Aside Program Acreage, Wasteland, Rights-of-Way, Roadsides, Ditchbanks and Hedgerows.

### Nonfood Uses

Forested areas, Turfgrass (Sod farms; Golf courses; Recreational areas, Lawns), Trees and Ornamentals (outdoor only), Shrubs and Flowers (Outdoors only); Pet collars; Nursery stocks (Outdoor use only); Building perimeters (Outdoor use only); Apicide (applied outdoors only); Bedding plants (outdoor only); Foliage plants (outdoor only); Imported fire ants (outdoor only).

- 2) This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions (to be placed at the beginning of the "Directions for Use" section of all end-use product labels):

**ENDANGERED AND THREATENED SPECIES PROTECTION REQUIREMENTS:** Before using this product, you must obtain any applicable Endangered Species Protection Bulletins ('Bulletins') within six months prior to or on the day of application. To obtain Bulletins, go to Bulletins Live! Two (BLT) at <https://www.epa.gov/pesticides/bulletins>. When using this product, you must follow all directions and restrictions contained in any applicable Bulletin(s) for the area where you are applying the product, including any restrictions on application timing if applicable. It is a violation of Federal law to use this product in a manner inconsistent with its labeling, including this labeling instruction to follow all directions and restrictions contained in any applicable Bulletin(s). For general questions or technical help, call 1-844-447-3813, or email [ESPP@epa.gov](mailto:ESPP@epa.gov).

This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions (to be placed at the beginning of the "Directions for Use" section of all end-use product labels):

**REPORTING ECOLOGICAL INCIDENTS:** For guidance on reporting ecological incidents, including death, injury, or harm to plants and animals, including bees and other non-target insects, see EPA's Pesticide Incident Reporting website: <https://www.epa.gov/pesticide-incidents> or call 901-774-4370.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. **PESTICIDE STORAGE:** Store unused product in original container only, in cool, dry areas out of reach of children and animals. Do not store in areas where temperatures frequently exceed 100°F (38°C). In case of minor spills, clean up immediately. Sweep up and dispose of wastes on site or in a landfill approved for pesticide use.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER DISPOSAL:

**Nonrefillable Container (Flexible-bag—all weights):** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**Nonrefillable Container (Rigid—Greater than 50 Lbs.):** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**Refillable Container:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

## WARRANTY—CONDITIONS OF SALE

Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the "DIRECTIONS FOR USE". To the extent consistent with applicable law, Manufacturer makes no other warranties, expressed or implied, including FITNESS or MERCHANTABILITY. To the extent consistent with applicable law, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use of handling of this product. The foregoing is a condition of sale and is accepted as such by the Buyer.