

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

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Barbara Brown
DREXEL CHEMICAL COMPANY
P.O. BOX 9306
MEMPHIS, TN. 38109

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Subject:

Label Amendment Submission of 09/30/93 In Response to PR Notice 93-7

EPA Reg. No. 19713-84

DREXEL CARBARYL 95 SPRAYABLE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

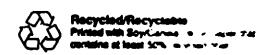
WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling AND
- WITHIN one year from date of this acceptance.



Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,

Jim Tompkins, Deputy Chief Registration Support Branch Registration Division (7505W)

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division

Barbara Brown
DREXEL CHEMICAL CO
BOX 9306
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-84
DREXEL CARBARYL 95 SPRAYABLE

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Add the following statement to the "Personal Protective Equipment" section of your label: "Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them." The exact location of this statement is shown in Section A on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Add "N-Methyl Carbamate" to your label in one of the locations shown in Section E on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Remove the statement "Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

ACCEPTED
with COMMENTS
is EPA Letter Dated

FEB 10 1994

Under the Federal Insecticide, Fundicide, and Redesticide Act as assessed, for the posticide registered under EPA May, No.

DREXEL CARBARYL 95 SPRAYABLE

A Wettable Powder for Control of Insect Pests on Cotton, Soybeans, Apples and Pears.

KEEP OUT OF THE REACH OF CHILDREN WARNING/AVISO

PRSGAUGION-A5-USUARIO:-Si-usted-no-lee-ingles;-no-use-este producto-hasta-que-la-etiqueta-le-haya-sido-explicado ampliamente:

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

EPA Reg. Number 19713-84 EPA Est. Number 19713-MS-1

WPS DELETIONS/REVISIONS 9/93

Manufactured by: Drexel Chemical Company P.O. Box 9306 Memphis, TN 38109

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting by placing finger on back of throat. Call a physician. Never give anything by mouth to an unconscious person.

IF ON SKIN: Remove contaminated clothing and wash skin with soap and plenty of water. If irritation develops get medical attention.

IF IN EYES: Immediately flush eyes with plenty of water. If irritation develops get medical attention.

NOTE TO PHYSICIAN: Carbaryl is a moderate, reversible, cholinesterase inhibitor. Atropine is antidotal. DO NOT use 2-PAM, opiates or cholinesterase inhibiting drugs.



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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

VARNING: May be fatal if swallowed. Avoid breathing spray mist. Avoid contact with eyes, skin, or clothing. Wash thoroughly

atter handling.

Personal Protective Equipment

Applicators and other bandlers must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Dust/Mist Filtering Respirator

tMSHA/NIOSH approved prefix TC-21C)

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to aquatic and estuarine invertebrates. For terrestrial uses, do not apply directly to water or areas where surface water is present, or to intertidal below the mean high water mark. 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.

FARM-WORKER-GAPETY-STATEMENTS

Bo-not-enter-treated-areas-without-protective-clothing-until sprays-have-dried-Because-certain-states-may-require-more restrictive-reentry-intervals-for-various-crops-treated-with-this product;-consult-your-State-Bepartment-of-Agriculture-for-further information:

Written-or-oral-warnings-must-be-given-to-workers-who-are expected-to-be-in-a-treated-area-or-in-an-area-about-to-be treated-with-this-product:-Oral-warnings-must-inform-workers-of areas-or-fields-that-may-not-be-entered-without-specific protective-clothing-until-sprays-have-dried;-and-appropriate actions-to-take-in-case-of-accidental-exposure;-as-described under-Precautionary-Statements-on-this-label:-When-oral-warnings

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are-given;-warnings-shall-be-given-in-a-language-customarily understood-by-the-workers:-Oral-warnings-must-be-given-if-there is-reason-to-believe-that-written-warnings-cannot-be-understood by-workers:

WARNING:-Area-treated-with-Garbaryi-on-tdate-of-application):-Bo not-enter-without-appropriate-protective-clothing-until-sprays have-dried:-In-case-of-accidental-exposure:-flush-eyes-or-skin with-plenty-of-water:-Gall-physician-if-irritation-persists:

Remove-and-wash-contaminated-clothing-before-reuse:

GENERAL INFORMATION

Carbaryl 95 Sprayable is a dry powder for dispersion in water and application as an insecticidal spray in hydraulic sprayers, mist blowers, low-gallonage ground equipment and aircraft. USE IN STRICT ACCORDANCE WITH LABEL DIRECTIONS AND CAUTIONS.

Special Directions for Preparing Low-Gallonage Spray: In low-gallonage ground equipment - Use 50-mesh or coarser screens in entire system; nozzles should be cone type, number 3 or larger. Use clean equipment. Put about 3/4 of the required water volume in spray tank. Close off booms, start pump and maintain moderate by-pass agitation while slowly adding the proper amount of Carbaryl 95 Sprayable. Add remaining water and continue to recirculate until suspension is uniform; then apply using at least 3 gallons per acre of the prepared spray. After spraying, flush tank and lines with clear water.

For Aircraft Application: For preparing spray in mixing or storage tank, follow above directions. To maintain uniform suspension, recirculate at intervals and before pumping into aircraft tank. For best results, use clean equipment and apply at least 1 gallon per acre of the prepared spray. After spraying, flush tanks and lines with clear water.

Combination Spray Mixtures in Low-Gallonage Equipment and Aircraft: Physical compatibility of Carbaryl 95 Sprayable with other pesticides in low-gallonage mixtures is not fully know. Before preparing large amounts, combinations should be tested by fully dispersing Carbaryl 95 Sprayable, then adding the other pesticide and the remaining portion of water. DO NOT USE MIXTURES THAT CURDLE OR PRECIPITATE.

Incompatibility will reduce insect control and may cause mechanical difficulties or plant injury. Use caution when applying concentrate spray mixtures. Under adverse growing conditions, combinations of Carbaryl 95 Sprayable with some phosphate pesticides may cause foliar injury.

COMPATIBILITY

 Carbaryl 95 Sprayable has been effectively used without plant injury with most common insecticides, miticides, fungicides, nutrients, adjuvants and with petroleum oil as used on citrus.

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- 2. Compatibility can be affected by water in your locality, various surfactants and other formulation ingredients. Possible plant injury may occur under adverse conditions such as high humidity, drought, improper fertilization, etc.
- 3. Do not mix Carbaryl 95 Sprayable with nutrients, adjuvants and other pesticides unless your experience indicates that the mixture is effective and will not result in plant injury. If uncertain, prepare a small amount of the mixture and test on a representative portion of the crop.
- 4. Unstable under highly alkaline conditions. Not effective if used with alkaline materials such as Bordeaux, lime, lime sulfur and casein-lime spreaders.

GENERAL CAUTIONS

- 1. To avoid possible injury on tender foliage, do not apply when foliage is wet or when rain or excessive humidity is expected during the next 2 days.
- 2. Does not control spider mite but is compatible with most common miticides.

IMPORTANT PRE-HARVEST AND GRAZING USE INFORMATION AND LIMITATIONS Tolerances established under the Federal Food, Drug and Cosmetic Act permit the sale of crops bearing probable Carbaryl 95 Sprayable residues when Carbaryl 95 Sprayable is used in accordance with label directions. Pre-harvest and grazing use limitations are listed at the end of the directions for each crop use. Where no pre-harvest or grazing time limitations are stated, application can be made to the day of harvest and crops can be grazed without time delay if directions for use on the crops are followed.

If Carbaryl 95 Sprayable insecticide is used in accordance with label directions, forage and feed crops, cotton forage, soybean hay, may be grazed or harvested for use as feed for dairy and meat animals without resulting in residues in milk or meat.

DIRECTIONS FOR USE

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

Do not apply this product through any type of irrigation system. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.



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AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of sgricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

Coveralls

Waterproof gloves

Shoes plus socks

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Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

IMPORTANT: The directions on this label are based on tests and field experience relating to (a) effectiveness; and (b) possible injury to plants and animals; and (c) residues in food, feed, meat, and milk. Follow directions for mos+ effective use.

FORAGE, FIELD AND VEGETABLE CROP CONTROL

Recommended dosages refer to pounds of Carbaryl 95 Sprayable per acre. Where a dosage range is indicate, use lower rate on young plants, higher rates on mature plants. Use sufficient spray gallonage to obtain full coverage. This will usually vary from 3 to 40 gallons per acre depending on equipment, degree of insect infestation, and stage of crop growth. Keep spray mixtures well agitated. Apply when insect or their damage appears and repeat at 7-14 day intervals or as necessary unless shorter intervals are specified below.

COTTON - Use .60 to 1 pound for early season thrips, flea beetles, cotton fleahopper, striped blister beetle and cotton leafworm. Use 1 to 2.10 pounds depending on the size of the cotton and insect population level, for mid and late season boll weevil, bollworms, fall armyworm, cotton leafperforator, leafrollers, leafhoppers, and tarnished plant bug and for light-

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to-moderate infestations of lygus bugs in Western irrigated cotton. Application should be made every 5-7 days as long as control is necessary. For improved bollworm control, add 1 gallon of blackstrap molasses (feed grade) per acre in a spray volume not to exceed 20 gallons per acre.

To avoid staining lint, do not use molasses after bolls open. Use 1.70 to 2.60 pounds for pink bollworm on a 5 to 7 day schedule depending on the size of the cotton and degree of infestation. Use 2.10 pounds for stink bugs and saltmarsh caterpillar. APHID populations will be suppressed by repeated applications of this insecticide. May be applied after bolls open. Pre-harvest interval is 7 days.

SOYBEANS - For light to moderate populations in Southeastern states only: Use .60 pound for velvetbean caterpillar, green cloverworm, bean leaf beetle, cucumber beetles and Mexican bean beetle. Use .60 to .85 pound for corn earworm. For clean-up of existing populations: Use .60 to 1 pound for blister beetles and Mexican bean beetle. Use 1 pound for alfalfa caterpillar, bean leaf beetle, cucumber beetles, green cloverworm, Japanese beetle, leafhoppers, three-cornered alfalfa hopper, thrips and velvetbean caterpillar.

Use 1 to 1.70 pounds for armyworm, corn earworm, webworms and stink bugs.

WARNING: Do not apply a combination of Carbarvl 95 Spravable and 2,4-DB herbicide (such as "Butyrac" 175 or "Butoxone" SB) to soybeans.

APPLES AND PEARS - Application of Carbaryl 95 Sprayable within 30 days after full bloom may provide apple thinning; to avoid this, delay use until at least 30 days after bloom. Foliar injury may result from combination with summer oils west of the Rocky Mountains or when used before second cover on York and McIntosh apples east of the Rocky Mountains.

West of the Rocky Mountains - Use .85 to 1 pound for apply aphid, woolly apply aphid, bagworms, California pearslug (pear sawfly), coding moth, apple rust mite, pearleaf blister mite, pear rust mite, eyespotted bud moth, green fruitworm, lygus bugs, orange tortrix, pear psyila, tentiform leafminers, lecanium scales. oystershell scale and San Jose scale. For optimum scale control, apply when crawlers are present. When heavy aphid infestations are present, repeated applications may be necessary for optimum control.

East of the Rocky Mountains - Use .60 pound for apple mealybug, apply aphid, codling moth and white apple leafhopper. When heavy aphid infestations are present, repeated applications may be necessary for optimum control. Use 1 pound for apple maggot, bagworms, eastern tent caterpillar, European apple sawfly.

eyespotted bud moth. fruit tree leafroller, green fruitworm. Japanese beetle, pear psyila, periodical cicada, plum curculio, redbanded leafroller, rosy apple aphid, woolly apple aphid, apple rust mite, pearleaf blister mite, pear rust mite, tarnished plant bug, tentiform leafminers, Forbes scale, lecanium scales. oystershell scale and San Jose scale. For optimum scale control, apply when crawlers are present. To control rosy apple aphids, apply before leaves are curled. Do not apply within 1 day of harvest of apples and pears.

Apple Thinning - Many factors influence the degree of apple thinning obtained with Carbaryl 95 Sprayable. These include tree age, variety, nutrition, previous crop, pruning, degree of set, bloom, weather and use of other chemical thinners. When any of these favor reduced fruit set, caution should be observed in applying Carbaryl 95 Sprayable so that excessive thinning and possible yield reduction will not occur. Recommended dosages refer to pounds of Carbaryl 95 Sprayable per 100 gallons dilute spray. Concentration: Use .30 to .85 pound on easily-thinned varieties. Apply for full coverage. On hard-to-thin varieties. use .85 to 1 pound.

Timing: Apply in one spray timed between 10 and 25 days after full bloom.

Varietal Response: Easily-thinned varieties include Cortland, Grimes, Jonathan, McIntosh, Orleans, Rome Beauty, Puritan. Red Delicious, Winesap and Yellow Newton. Difficult-to-thin varieties include Baldwin, Ben Davis, Duchess, Early McIntosh, Golden Delicious, Lady Apple, Northern Spy, Rhode Island Greening, Steele Red. Turley, Wealthy, Yellow Transparent and York Imperial.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE INSTRUCTIONS:

Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool dry area away from any heat or ignition source. Do not stack over 2 pallets high. Move bags carefully so as not to tear or puncture. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Do not allow material to become wet or store in a damp, humid area. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original container only. If the contents are leaking or material is spilled, follow these steps:

- 1. Collect and place in suitable containers for disposal.
- 2. Wash area with water and soap to remove remaining pesticide.
- 3. Follow washing with clean water rinse.
- 4. Do not allow run off to enter sewer or contaminate water supplies.
- 5. Dispose of waste as indicated below:

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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

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. In no case shall Drexel or the seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.