



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

MAR 14 1994

Barbara Brown
DREXEL CHEMICAL CO.
BOX 9306
MEMPHIS, TN 38109

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 09/24/93 in Response to PR Notice 93-7
EPA Reg. No. 19713-131
DREXEL CARBARYL 4 OIL

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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2 of 11

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:

Submit the required notification. Then 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 as amended

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

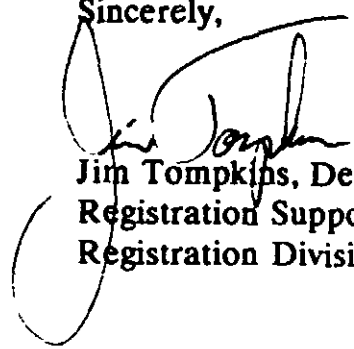


4 of 11

Hand or courier deliveries of final 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

cc: Office of Compliance Monitoring

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.19713-131
DREXEL CARBARYL 4 OIL

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

The respirator requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)." The exact location is shown in Sections A and B on Part I 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.

DREXEL

CARBARYL 4 OIL

An Oil Suspension For Control Of Insect Pests

ACTIVE INGREDIENTS:

Carbaryl (1-Naphthyl N-Methylcarbamate).....	49.0%
INERT INGREDIENTS:.....	51.0%
TOTAL:.....	100.0%

Product contains 4 pounds carbaryl as active ingredient.

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. 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.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

IF ON SKIN: ~~Immediately remove contaminated clothing, INCLUDING SHOES,~~ and wash skin with soap and plenty of water. If irritation develops, send for a physician.

See Side Panel For Additional Precautionary Statements.

WPS DELETIONS/REVISIONS 9/93

EPA Reg. No. 19713-131
EPA Est. No. 19713-GA-1

Net Content:

Manufactured by: Drexel Chemical Company
Memphis, Tennessee 38109

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 14 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-131

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

CAUTION: Harmful if swallowed. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wash thoroughly after handling. ~~Wash hands and face before eating or smoking.~~

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

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

User should:

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 product is toxic to birds and other wildlife. For terrestrial uses, do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

BEE CAUTION. MAY KILL HONEYBEES IN SUBSTANTIAL NUMBERS

This product is highly toxic to bees exposed to direct treatment or residues on crops. Protective information may be obtained from your Cooperative Agricultural Extension Service.

Do not use when value of honeybees as pollinators is more important than insect control. Before applying warn beekeepers to locate hives beyond bee flight range until 1 week after application or to take other equally effective precautions.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

GENERAL INFORMATION:

Carbaryl 4 Oil Insecticide is a dispersion of finely ground technical carbaryl in a non-aromatic, low volatile oil. It is designed for air application as a low volume or ultra low volume spray. It may also be applied by ground mist blower or cold fogging, if diluted with diesel fuel, kerosene or #2 fuel oil.

READ THIS LABEL BEFORE USE. USE IN STRICT ACCORDANCE WITH DIRECTIONS AND CAUTIONS.

PREHARVEST AND GRAZING USE INFORMATION AND LIMITATIONS

Tolerances established under the Federal Food, Drug and Cosmetic Act, permit the sale of crops bearing probable carbaryl residues when this product is used in accordance with label directions. If used as directed, treated forage may be grazed or used as feed for dairy and meat animals without causing illegal residues in meat or milk. This product may be applied up to and including the day of harvest or grazing of forage crops.

MIXING AND APPLICATION

1. Carbaryl 4 Oil thickens during storage. Roll or agitate drums or recirculate product in bulk tanks before use to reduce viscosity and restore homogeneity. Carbaryl 4 Oil may be held prior to use and transferred in any materials of construction suitable for use with fuel oil, kerosene or diesel oil. Protect from water.
2. Before and after use, flush nurse tanks, pumps, lines, hoses and entire systems with diesel fuel, kerosene or #2 fuel oil until clean. Water, scale, rust and other residue must be removed from pumps, mixing and spray systems before use.
3. Carbaryl 4 Oil is not compatible with and should not be mixed with water, alcohol or aromatic solvents, but can be diluted with aliphatic oil (diesel fuel, kerosene, or #2 fuel oil). Compatibility with other pesticides has not been thoroughly tested. **DO NOT USE IN TANK MIX COMBINATIONS UNLESS YOUR EXPERIENCE INDICATES THAT THE MIXTURE IS EFFECTIVE AND WILL NOT RESULT IN PLANT INJURY OR MECHANICAL DIFFICULTY.**
4. For best mixing when preparing diluted Carbaryl 4 Oil, add diluent oil to mix tank before adding proper volume of Carbaryl 4 Oil. Provide periodic circulation to maintain uniform suspension if diluted.
5. Calibrate equipment to deliver the desired spray volume. Flat fan nozzles may be used to apply both undiluted and diluted Carbaryl 4 Oil. Rotary atomizing and hollow cone nozzle are not recommended for applying undiluted Carbaryl 4 Oil but can be used if 1 to 1 dilution is made. Use of a high-volume 50-mesh in-line strainer is suggested. Use of screens behind nozzles is not recommended.

7/11

6. Apply by air undiluted, or diluted with kerosene, diesel fuel or #2 fuel oil. At temperatures below 50 degrees F. (10 degrees C.) dilution of 4 volumes of Carbaryl 4 Oil with 1 volume of diluent oil is recommended to assure uniform flow and spray distribution. Dilutions greater than 1 to 1 by volume are not recommended; higher dilutions will reduce residual properties. Dilute 1 to 1 by volume when applying with ground equipment.
7. Apply only when weather conditions are favorable. Wind and rising air currents may cause undesirable spray drift and reduce insect control.

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.

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 agricultural 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

Read entire Label. Use strictly according to Label Directions and Cautions. Do not use application methods, dosages, concentrations, or frequencies not listed on labeling. Do not

apply against target pests not listed on labeling. Do not mix with fertilizer.

INSECT CONTROL

The directions on this label are based on tests and field experience relating to (a) effectiveness; (b) possible injury to plants and animals; and (c) residues in food, feed, meat and milk. Follow directions for most effective use. DOSAGES LISTED REFER TO QUARTS OF CARBARYL 4 OIL PER ACRE, NOT TO VOLUME OF FINISHED SPRAY PER ACRE. Refer to Steps 4 and 6 under STORAGE AND APPLICATION FOR INSTRUCTION ON DILUTION.

CORN (Field, Pop) INSECT CONTROL

For corn rootworm beetles: Apply 1 quart of Carbaryl 4 Oil per acre as needed at first silking if populations are at economic levels and/or apply later when needed to control adult population buildup to reduce larval damage to next year's crop. Do not make more than two applications.

For Western Bean Cutworm: Apply a single application of 2 quarts of Carbaryl 4 Oil plus 2 quarts diesel fuel, kerosene or #2 fuel oil per acre when an average of 1 in 7 plants have western bean cutworm egg masses or newly hatched larvae and 90 to 100% of the tassels have emerged. Application after 100% of the silks have emerged will reduce effectiveness.

For Japanese Beetle: Apply 1 quart Carbaryl 4 Oil per acre when adult beetles are present.

For Grasshoppers: Apply 1/4 to 1-1/4 quarts Carbaryl 4 Oil per acre. Lower rate is suggested for nymphs on small plants. Use 1 to 1 1/2 quarts when grasshoppers or foliage are mature and greater coverage is required.

FOREST INSECT CONTROL

For control of Gypsy Moth, Fall and Spring Cankerworms, Saddled Prominent, Forest Tent Caterpillar, Elm Spanworm, Oak Leafroller Complex and Japanese Beetle: Apply 1 quart Carbaryl 4 Oil per acre when larvae are in early instars and leaves are at least 1/3 grown, or when adult Japanese Beetles are present.

For Spruce Budworm and Western Spruce Budworm: Apply 1 quart Carbaryl 4 Oil per acre for foliage protection. East of the Rocky Mountains apply when larvae are in third and fourth instars. In the Rocky Mountains and West of the Rocky Mountains apply when larvae are in third through fifth instars.

For Douglas Fir Tussock Moth: For maximum foliage protection apply 2 quarts Carbaryl 4 Oil per acre when larvae are in first and second instars. Application to later instars will provide control but with reduced foliage protection.

For population control and foliage protection of high value trees using ground mist blower application, apply 4/5 pint of spray mixture containing equal volumes of Carbaryl 4 Oil and diesel fuel, kerosene or #2 fuel oil per 20 to 30 foot trees (1/5 lb. ai/tree) when larvae are in early instars. Cover foliage thoroughly, but avoid runoff.

PASTURE, RANGELAND AND WASTELAND INSECT CONTROL

For Grasshoppers: Apply 1/2 to 1-1/2 quarts of Carbaryl 4 Oil per acre. Lower rate is suggested for nymphs on small plants or sparse vegetation. Use higher rate when grasshoppers are mature or vegetation is thick.

For Range Caterpillar: Apply 1/2 to 1 quart of Carbaryl 4 Oil per acre. Use the lower rate when larvae are in early instars and the higher rate for later instars.

For Japanese Beetle: Apply 1 quart of Carbaryl 4 Oil per acre when adult beetles are present.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL

Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, State or local procedures.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

WARRANTY - CONDITION OF SALE:

DIRECTIONS FOR USE of the product are based on field use and tests believed reliable and should be followed carefully. It is however impossible to eliminate all risks associated with use of this product. Because such factors as weather conditions, foreign material and manner of use for application are all beyond the control of Drexel Chemical Company or the Seller of this product, such things as crop injury, ineffectiveness or other unintended consequences may result.

ALL SUCH RISKS ARE ASSUMED BY THE BUYER.

Drexel warrants that this product conforms to the chemical description on the label and is reasonable fit for the purposes referred to in the directions for use. Drexel makes no other warranties, express or implied, including **FITNESS OR MERCHANTABILITY**. 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.

The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.