

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SS15376 $\frac{300}{37}$

pm19

19713-212

1/n SS19993 $\frac{300}{17}$

MAR 12 1997

Barbara Brown
 Drexel Chemical Company
 P.O. Box 13327
 Memphis, TN 38113-0327

Subject: Drexel Carbaryl 10D
 EPA Registration No. 19713-212
 Amendment dated November 22, 1996 (Response to Agency letter dated 10/1/96)
 Amendment dated February 12, 1997 (Response to Agency letter dated 10/1/96 and PR Notice 96-6 - *Replaces 11/22/96 submission*)

Dear Ms. Brown:

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) In the GENERAL PRECAUTIONS section, change "...repeated at 5 to 7 day intervals..." to "...repeated at 7 day intervals" per the Agency letter dated 10/1/96.
- b) Because your product is intended for use in commercial agricultural situations and as a home garden product, the Worker Protection Standard requirements and the requirements outlined in the Agency letter dated 10/1/96 should be kept separate to avoid confusion. Therefore, delete the NON-AGRICULTURAL USE REQUIREMENTS box and create a new box titled RESIDENTIAL USER SAFETY REQUIREMENTS as follows:

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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RESIDENTIAL USER SAFETY REQUIREMENTS
<p>Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when applying this product.</p> <p>Change clothing as soon as possible after use.</p> <p>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.</p> <p>Do not allow children or pets to contact treated area until dust has settled.</p>

c) In the Directions for Use, add a section titled "DIRECTIONS FOR RESIDENTIAL USE" as follows:

"DIRECTIONS FOR RESIDENTIAL USE: 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."

d) In the Directions for Use on COLLARDS, GARDEN BEETS, etc..., change "...at 5 to 7 day intervals" to "...7 day intervals."

e) Change the Pre-harvest intervals (PHIs) for the following crops:

- COLLARDS - 14 days
- GARDEN BEETS - 3 days
- KALE - 14 days
- LETTUCE - 3 days (head); 14 days (leaf)
- MUSTARD GREENS - 14 days
- RADISHES - 3 days
- RUTABAGAS - 3 days
- SPINACH - 14 days
- TURNIPS - 3 days (roots); 14 days (tops)

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f) In the Directions for Use on CORN (SWEET/FIELD), change "...apply at 2 to 3 day intervals..." to "...apply at 7 day intervals..."

g) Change the Directions for Use on CATS and DOGS to the following as outlined in the Agency letter dated 10/1/96:


"CATS, DOGS: To control Ticks and Fleas. 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. Comb out dead ticks several hours after treatment. This product should not be applied by children. Do not use on pregnant dogs. Do not use on kittens or puppies under 12 weeks of age. Repeat at 7 day intervals if needed.

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,



Dennis H. Edwards, Jr.
Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

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**CARBARYL 10D
(10% Sevin Dust)**

A dusting powder for control of insect pests.

ACTIVE INGREDIENT:

Carbaryl (1-Naphthyl N-methylcarbamate)10.00%

INERT INGREDIENTS:90.00%

TOTAL:100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Read Entire Label Before Using This Product

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching finger on back of throat. Call a physician. Never give anything by mouth to an unconscious person.

IF ON SKIN: 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.

FIRST AID

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

ASPCA National Animal Poison Control: 1/800-548-2423.

Carbaryl is an N-methyl carbamate insecticide.

EPA Reg. No. 19713-212

EPA Est. No. 19713-GA-1

Drexel Chemical Company

P.O. Box 13327, Memphis, TN 38113-0327

Revision: 8/26/96

Revision: 10/31/96 Agency notice 10/1/96

Revision 12/5/96 - Agency PR Notice 96-6

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

MAR 12 1997

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

19713-212

97 FEB 18 AM 12:28

REC'D ... PP/DPDI

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Do not use this product in commercial food areas or food handling establishments, restaurants, or other places where food is prepared or processed.

PERSONAL PROTECTIVE EQUIPMENT

WPS USES: Applicators and other handlers who handle this pesticide for any uses covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural plant uses are covered -- must wear: Long-sleeved shirt and long pants, waterproof gloves and shoes plus socks.

NON-WPS USES: Applicators and other handlers who handle this pesticide for any uses NOT covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural-plant uses are covered -- must wear: Long-sleeved shirt and long pants, shoes plus socks and household latex or rubber gloves when applying this product.

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

USER SAFETY RECOMMENDATIONS:

Users 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 pesticide is extremely toxic to aquatic and estuarine invertebrates. 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 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.

GENERAL PRECAUTIONS

Some phytotoxicity may occur on tender foliage in the presence of rain and / or high humidity of several days duration following application. Application should begin when insects or damage are first observed and repeated at 5 to 7 day intervals for satisfactory control of insect pests. Subsequent planting of food and feed crops in treated soil must be made with crops on this or other carbaryl labels.

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. Does not control spider mites.

IMPORTANT PRE-HARVEST AND GRAZING USE INFORMATION AND

LIMITATIONS: If CARBARYL 10D is used in accordance with label directions, forage and feed crops including bean vines, carrot tops, cowpea hay, peanut hay, pea vines and beet tops 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.

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. 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 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 plant, soil, or water is: Coveralls, waterproof gloves and shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Use product only outside or in a well-ventilated area. This product should not be applied by children. Do not allow children or pets to contact treated area until dust has settled.

IMPORTANT: 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 surface 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 re-entering. For plants above chest height, consider using a liquid carbaryl product. Do not repeat application more than once a week.

VEGETABLES

BEANS: To control *Bean Leaf Beetle, Corn Earworm, Cucumber Beetle, Flea Beetle, Japanese Beetle, Leafhoppers and Mexican Bean Beetle* - Use 10 pounds per acre or 1/2 ounce per 50 feet of row. Where *Mexican Bean Beetle* is the only problem, 5 pounds per acre will be sufficient. To control *Lima Bean Pod Borer, Lygus Bug and Stink Bug* - Apply 20 pounds per acre.

BROCCOLI, BRUSSELS SPROUT, CABBAGE, CAULIFLOWER, KOHRALBI: To control *Flea Beetle and Harlequin Bug* - Apply 5 to 10 pounds per acre. To control *Amyworm, Corn Earworm, Diamond-Back Moth Larvae and Imported Cabbageworm* - Use 10 to 15 pounds per acre or 1/2 to 1 ounce per 50 feet of row. Will not control *Cabbage Looper*. Do not apply within 3 days of harvest.

CANTALOUPE, CUCUMBER, MELONS, PUMPKIN, SQUASH: To control *Cucumber Beetle, Flea Beetle, Melonworm, Pickleworm and Squash Bug* - Use 10 pounds per acre or 1/2 ounce per 50 feet of row.

CARROTS: To control *Flea Beetle, Leafhopper, Lygus, Spittlebug and Stink Bug* Use 10 to 20 pounds per acre or 1/2 to 1 ounce per 50 feet of row.

COLLARDS, GARDEN BEETS, KALE, LETTUCE, MUSTARD GREENS, RADISHES, RUTABAGAS, SPINACH, TURNIPS: To control *Flea Beetle*, *Harlequin Bug* and *Leafhopper* - Use 5 to 10 pounds per acre. For *Amyworm*, *Corn Earworm*, *Diamond-Back Moth Larvae*, *Imported Cabbageworm*, *Stink Bugs* and *Tarnished Plant Bug* - Use 10 to 20 pounds per acre or ½ to 1 ounce per 50 feet of row. For best control of *Corn Earworm* on lettuce forming heads, use 20 pounds per acre at 5 to 7 day intervals. Will not control *Cabbage Looper*. Do not apply within 3 days of harvest.

CORN (Sweet / Field): To control *Corn Earworm*, *European Corn Borer*, *Fall Armyworm*, *Japanese Beetle* and *Sap Beetle* - Use 15 to 20 pounds per acre or 1 ounce per 50 feet of row. For *Budworm* damage in the whorl, apply to entire plant and repeat as needed. For ear and silk attacking insects, apply at 2 to 3 day intervals starting when silks appear; continue until silks begin to dry. Three or four applications may be needed depending on severity of infestation. Application of this product to tassels (silks) will seriously reduce bee population.

EGGPLANTS, PEPPERS, TOMATOES: To control *Fall Armyworm*, *Flea Beetle*, *Leafhoppers* and *Tomato Fruitworm* - Use 10 pounds per acre or ½ ounce per 50 feet of row. For control of *European Corn Borer*, *Stink Bug* and *Tomato Hornworm* - Use 10 to 20 pounds per acre.

OKRA: To control *Corn Earworm* and *Stink Bug* - Use 10 to 20 pounds per acre or ½ to 1 ounce per 50 feet of row.

POTATOES: To control *Colorado Potato Beetle* - Use 5 pounds per acre. For control of *Leafhopper* and *Flea Beetle* - Use 10 pounds per acre. To control *Lygus Bugs* - Use 20 pounds per acre.

SMALL FRUIT

BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES: To control *Japanese Beetle*, *Leafhopper*, *Leaf Roller* and *Raspberry Aphid* - Use 20 pounds per acre. Do not apply within 7 days of harvest.

BLUEBERRIES: To control *Blueberry Maggot*, *Cherry and Cranberry Fruitworm* and *Japanese Beetle* - Use 30 pounds per acre. Apply 3 weeks prior to harvest; repeat 10 days later as needed.

GRAPES: To control *Grape Leaf Folder*, *Grape Leafhopper* and *Grape Leaf Skeletonizer* - Use 10 to 20 pounds per acre. Apply before first brood of *Grape Leaf Folder Larvae* emerge and as needed for *Leafhoppers*. To control *Grape Berry Moth*, *Japanese / June Beetles* and *Red-Banded Leaf Roller* - Use 20 pounds per acre.

STRAWBERRIES: To control *Meadow Spittlebug*, *Strawberry Leaf Roller* and *Strawberry Weevil* - Use 10 to 20 pounds per acre. Do not apply within 1 day of harvest.

ORNAMENTALS: To control *Apple Aphid*, *Bagworm*, *Birch Leaf Miner*, *Blister Beetles*, *Boxelder Bug*, *Boxwood Leaf Miner*, *Elm Leaf Aphid*, *Elm Leaf Beetle*, *Flea Beetle*, *Japanese / June Beetle*, *Lace Bug*, *Leafhopper*, *Leaf Roller*, *Oak Leaf Miner*, *Orange Tortrix*, *Periodical Cicada*, *Plant Bug*, *Psyllids*, *Rose Slug*, *Rose Aphid*, *Scale Insect (crawler stage only)*, *Tent Caterpillar*, *Willow Leaf Beetle*, *Thrips (exposed only)* - Apply thoroughly at first signs of plant damage and repeat at 7 day intervals or as needed for good control.

ALFALFA, CLOVER, FORAGE GRASSES, PASTURES: To control *Amyworms*, *Grasshoppers*, *Stink Bugs* and *Thrips* - Use 10 to 15 pounds per acre when insects first appear. Repeat at 7 to 14 day intervals as necessary. May be applied up to harvest at rates directed, without exceeding residue tolerances except for Alfalfa which has a pre-harvest interval of 3 days.

COTTON: To control early season *Flea Beetle*, *Cotton Leafhopper* and *Thrips* - Use 5 to 10 pounds per acre at 5 to 10 day intervals beginning with increased pest pressures, then as needed. For control of mid-season / late season *Boll Weevil*, *Cotton Bollworm*, *Cotton Leaf Perforator*, *Fall Armyworm*, *Leafhopper*, *Leaf Roller* and *Lygus Bugs* - Use 10 to 20 pounds per acre; amount depends on plant size and pest pressure. Applications for *Boll Weevil* should be made every 5 to 7 days through end of growing season. To control *Pink Bollworm* - Use 15 to 25 pounds per acre; amount depends on size of cotton and degree of infestation. Apply at 5 to 7 day intervals. To control *Grasshoppers* - Use 5 to 15 pounds per acre, applied on appearance or signs of plant damage. Pre-harvest interval is 7 days.

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POULTRY

CHICKENS, PARTRIDGES, PHEASANTS, and PIGEONS: *Bed Bugs (in houses or quarters), Chicken Red Mite, Fleas, Lice and Northern Fowl Mite* - Apply 1 pound per 80 sq. ft. of floor and litter; and to roosts and interior surfaces. Do not apply directly to eggs or nest litter. Do not house birds in treated houses or areas within 7 days of slaughter. For *Lice and Northern Fowl Mite* on the birds, as a supplement to treatment of premises, apply 1 pound per 200 birds. Direct dust to vent and fluff areas and distribute throughout feathers. Do not repeat within 4 weeks. Do not apply within 7 days of slaughter. Do not contaminate feed or drinking water.

HOUSEHOLD PETS

Read Entire Label Before Each Use.

CATS / DOGS: To control *Ticks and Fleas* 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. Comb out dead ticks several hours after treatment. Repeat at 7 day intervals if needed. Do not treat animals less than 4 weeks old. Do not use on pregnant dogs. Do not use on nursing bitches. Repeat at weekly intervals.

Sleeping Quarters (Cat / Dog): To control *Ticks and Fleas* dust liberally in and around sleeping areas, kennels, and dog houses by means of a shaker can, hand or power duster. Dust bedding and doghouses using a shaker can or other dust applicator. Force dust into cracks and crevices. Repeat as needed.

Consult a veterinarian before using this product on debilitated or aged animals, or animals on medication. 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.

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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 runoff to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below.

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.