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MAR 12 1997

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

Subject: Drexel-Carbaryl 5D  
EPA Registration No. 19713-213  
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 ENVIRONMENTAL HAZARDS statement, delete the following: "...except for rice uses. Discharge from rice fields may kill aquatic and estuarine invertebrates." This product is not registered for use on rice and therefore these statements are inappropriate for this label.
- b) 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.
- c) 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							

Forwards A: 19713/213.1 3/10/97

**RESIDENTIAL 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 hands 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.

d) 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."

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

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) The Pre-harvest intervals (PHIs) for COLLARDS, KALE, MUSTARD GREENS, SPINACH, GARDEN BEETS, TURNIPS, RADISHES, RUTABAGAS, LETTUCE (Head), and LETTUCE (Leaf) have been deleted from your label. Please add these PHIs back to your label.

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

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**"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

4/11

**DREXEL  
Carbaryl 5D  
(5% Sevin Dust)**

A dusting powder for control of insect pests.

**ACTIVE INGREDIENT:**

Carbaryl(1-Naphthyl N-methylcarbamate).....	5.00%
<b>INERT INGREDIENTS:</b> .....	<b>95.00%</b>
<b>TOTAL:</b> .....	<b>100.00%</b>

**KEEP OUT OF THE REACH OF CHILDREN  
CAUTION  
Read Entire Label Before Using This Product**

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Induce vomiting by touching 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 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 and is a cholinesterase inhibitor.

EPA Reg. No. 19713-213  
EPA Est. No. 19713-TN-1

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

09/01/93 - WPS  
05/23/96 - Household Pest - DCI 3/1/96  
08/26/96 - Label Revision  
11/21/95 - Revision in response to Agency Notice dated 10/1/96  
12/09/96 - 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.

19713-213

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REC'D  
9/DPD1

**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 plants 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/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, except for rice uses. Discharge from rice fields may kill aquatic and estuarine invertebrates. 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 pest. Subsequent planting of food and feed crops in treated soil must be made when 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 5D 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**

This requirement 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 area 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*, *Leafhopper* and *Mexican Bean Beetle* - Use 20 pounds per acre or 1 ounce per 50 feet of row. Where *Mexican Bean Beetle* is the only problem, 10 pounds per acre will be sufficient. To control *Lima Bean Pod Borer*, *Lygus Bug* and *Stink Bug* - Apply 40 pounds per acre.

**BROCCOLI, BRUSSELS SPROUT, CABBAGE, CAULIFLOWER, KOHLRABI:**

To control *Flea Beetle* and *Harlequin Bug* - Apply 10 to 20 pounds per acre. To control *Armyworm*, *Corn Earworm*, *Diamond-Back Moth Larvae* and *Imported Cabbageworm* - Apply 20 to 30 pounds per acre or 1 to 2 ounces per 50 feet of row. Will not control *Cabbage Looper*. Do not apply within 3 days of harvest.

**CARROTS:** To control *Flea Beetles*, *Leafhoppers*, *Lygus*, *Spittlebugs* and *Stink Bugs* - Apply 20 to 40 pounds per acre, or 1 to 2 ounces per 50 feet of row.

**CANTALOUPE, CUCUMBER, MELON, PUMPKIN AND SQUASH:** To control *Cucumber Beetle*, *Flea Beetle*, *Melonworm*, *Pickleworm* and *Squash Bug* - Apply 20 pounds per acre, or 1 ounce per 50 feet of row.

**COLLARDS, GARDEN BEETS, KALE, LETTUCE, MUSTARD GREENS, RADISHES, RUTABAGAS, SPINACH, TURNIPS:** To control *Flea Beetles*, *Harlequin Bug* and *Leafhoppers* - Apply 10 to 20 pounds per acre. For *Armyworm*, *Corn Earworm*, *Diamond-Back Moth Larvae*, *Imported Cabbageworm*, *Stink Bugs* and *Tarnished Plant Bug* - Apply 20 to 40 pounds per acre, or 1 to 2 ounces per 50 feet of row. For best control of *Corn Earworm* on lettuce forming heads, apply 40 pounds per acre at 5 to 7 day intervals. Will not control *Cabbage Looper*. Do not apply within 3 days of harvest.

~~**COLLARDS, KALE, MUSTARD GREENS, SPINACH:** Do not apply within 14 days of harvest.~~

~~**GARDEN BEETS, TURNIPS:** Do not apply within 3 days of harvest of tops or within 14 days of harvest of roots.~~

~~**RADISHES, RUTABAGAS:** Do not apply within 3 days of harvest.~~

~~**LETTUCE (Head):** Do not apply within 3 days of harvest.~~

~~**LETTUCE (Leaf):** Do not apply within 14 days of harvest.~~



**CORN (SWEET / FIELD):** To control *Corn Earworm, European Corn Borer, Fall Armyworm, Japanese Beetle and Sap Beetle* - Apply 30 to 40 pounds per acre, or 1 ounce per 50 feet of row. For *Budworm* damage in the whorl, apply to the 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.

**EGGPLANT, PEPPER, TOMATO, :** To control *Fall Armyworm, Flea Beetle, Leafhopper and Tomato Fruitworm* - Apply 20 pounds per acre, or 1 ounce per 50 feet of row. For control of *European Corn Borer, Stink Bug and Tomato Hornworm* - Apply 20 to 40 pounds per acre.

**OKRA:** To control *Corn Earworm and Stink Bugs* - Apply 20 to 40 pounds per acre, or 1 to 2 ounces per 50 feet of row.

**POTATO:** To control *Colorado Potato Beetle* - Apply 10 pounds per acre. For control of *Flea Beetle and Leafhoppers* - Apply 20 pounds per acre and *Lygus Bugs* - Apply 40 pounds per acre.

#### SMALL FRUIT

**BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, RASPBERRIES:** To control *Japanese beetle, Leafhopper, Leaf Rollers, Raspberry Aphid* - Apply 40 pounds per acre. Do not apply within 7 days of harvest.

**BLUEBERRIES:** To control *Blueberry Maggot, Cherry and Cranberry Fruitworm, Japanese Beetle* - Apply 60 pounds per acre. Apply 3 weeks prior to harvest; repeat 10 days later as needed.

**GRAPES:** To control *Grape Leaf Folder, Grape Leafhopper, Grape Leaf Skeletonizer* - Apply 20 to 40 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, Red-banded Leaf Roller* - Apply 40 pounds per acre.

**STRAWBERRIES:** To control *Meadow Spittlebug, Strawberry Leaf Roller, Strawberry Weevil* - Apply 20 to 40 pounds per acre. Do not apply within 1 day of harvest.

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**ORNAMENTALS:** To control *Apple Aphid, Bagworm, Birch Leaf Miner, Blister Beetles, Boxelder Bug, Boxwood Leaf Miner, Elm Leaf Aphid, Elm Leaf Beetles, Flea Beetles, Japanese / June Beetles, Lace Bugs, Leafhoppers, Leaf Rollers, Oak Leaf Miner, Orange Tortrix, Periodical Cicada, Plant Bugs, Psyllids, Rose Slug, Rose Aphid, Scale Insect (crawler stage only), Tent Caterpillars, Willow Leaf Beetle and 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 *Armyworm, Grasshopper, Stink Bug and Thrips* - Use 20 to 30 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 tolerance except for alfalfa, which has a pre-harvest interval of 3 days.

**COTTON:** To control early season *Cotton Leafhoppers, Flea Beetles and Thrips* - Apply 10 to 20 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 Leaf Perforator, Cotton Bollworms, Fall Armyworm, Leafhoppers, Leaf Rollers and Lygus Bugs* - Apply 20 to 40 pounds per acre, amount depending 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 30 to 50 pounds per acre, amount depending on size of cotton and degree of infestation. Apply at 5 to 7 day intervals. To control *Grasshoppers* use 10 to 30 pounds per acre, applied on appearance or signs of plant damage. The Pre-Harvest Interval is 7 days.

#### **HOUSEHOLD PETS**

**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. **Sleeping Quarters (Dog / Cat):** To control ticks and fleas, dust liberally in and around sleeping areas, kennels, and dog houses by means of a shaker can, hand or powder duster. Force dust in 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. Do not use on nursing bitches.

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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 run off 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.