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

MAR 1 4 1994

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Subject: Label Amendment Submission of 09/08/93 in Response to PR Notice 93-7 EPA Reg. No. 19713-334 ALDEX SEVIN-10G 10% SEVIN GRANDULAR INSECTICIDE

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.

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

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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

Subject: Comment Sheet for EPA Reg Nr.19713-334
ALDEX SEVIN-10G 10% SEVIN GRANULAR INSECTICIDE

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.

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.

AIDEX SEVIN-10G SEVIN GRANULAR INSECTICIDE

FOR THE CONTROL OF EUROPEAN CORN BORER

KEEP OUT OF REACH OF CHILDREN CAUTION

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EPA Reg.No. 19713-334 EPA Est.No. 19713-GA-1

N-methylcarbamate (carbaryl).

Manufactured By:
Drexel Chemical Company
P. O. Box 9306
Memphis, Tn 38109

WPS REVISION - ADDITION/DELETIONS - 9/3/93

ACCEPTED
wish COMMENTS
In EPA Letter Dated

MAR 1 4 1994

Under the Federal Invectichts, Fundicide, and Bodesnicide Act as amended, for the pesticide registered under EPA Reg. No. 19713-334

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION: May be harmful if swallowed. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash-thoroughly-after handling-

PERSONAL PROTECTIVE EQUIPMENT Applicators and other handlers must wear: Long-sleeved shirt and long pants Waterproof gloves Shoes plus shocks

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:

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

Remove clothing immediately if pesticides 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.

#### 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 (PPR), 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 (RRI) 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 Shoes plus socks

### DIRECTIONS FOR USE ON CORN

For the control of European Corn Borer, use AIDEX 10% Sevin Granules at the rate of 15 to 20 pounds per acre by aircraft or ground equipment. More than one application may be necessary. Do not apply within seven days of harvest.

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.

### WAI:RANTY - 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.

Manufactured By:

DREXEL CHEMICAL COMPANY

P. O. Box 9306, MEMPHIS, TENN. 38109-0306

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