

19713-389

11/25/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 25 2009

Drexel Chemical Company
1700 Channel Avenue
P.O. Box 13327
Memphis, Tennessee 38113

Dear Ms. Chan,

Subject: Proposed Revised Basic Confidential Statement of Formula
Drexel Slug and Snail Bait
EPA Registration No. 19713-389
Your submission dated August 24, 2009

The Confidential Statement of Formula dated 11/19/09 for the revised basic CSF submitted in connection with your application for registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable provided you make the following changes to the label:

- On the sublabel for consumer use, under the "Environmental Hazards" statement, revise the sentence that reads "Do not apply directly to water" to read: "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark" so that your label matches the parent label you are citing.
- Revise the following marketing claims:
 - Delete the term technology from "Reduced rate **technology**"
 - Delete the term technology from "Low rate **technology**"
 - Delete the entire phrase "The power is in the pellet"
- Revise the following marketing claim that reads: "Rain and irrigation resistant: Due to exclusive manufacturing techniques, granules of this product resist heavy watering..." to read: "Rain and irrigation resistant: granules of this product resist heavy watering..."

Note, further label changes will be required once product reregistration is completed. If you have any questions, please contact Autumn Metzger at 703-305-5314 or metzger.autumn@epa.gov.

Regards,

A handwritten signature in black ink that reads "Venus Eagle".

Venus Eagle PM 01
Insecticide-Rodenticide Branch
Registration Division (7505P)

**MASTER LABEL CONSISTING OF THE
FOLLOWING SUBLABELS:**

- 1. SUBLABEL FOR COMMERCIAL USE**
- 2. SUBLABEL FOR CONSUMER USE**

**ACCEPTED
With COMMENTS
In EPA Letter Dated:
NOV 25 2009
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:**

19713-389

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ACCEPTED
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Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
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19713-389



SUBLABEL FOR
COMMERCIAL USE

SLUG AND SNAIL BAIT

For control of snails and slugs in turf, ornamentals, field crops, tobacco, seed crops, vegetables, tree crops & small fruits.

ACTIVE INGREDIENT:

Metalddehyde (2,4,6,8-tetramethyl-1,3,5,7-tetraoxycyclo-octaine).....	4.0%
Other Ingredients:.....	96.0%
TOTAL.....	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION
See First Aid Below

EPA Reg. No. 19713-389
EPA Est. No. 19713-XX-XXX

Net Content: 1 lb. to 2000 lbs.

FIRST AID
<p>If On Skin:</p> <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
<p>If Swallowed:</p> <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>
<p>Note to Physician: No specific antidote is available. Treat the patient symptomatically.</p>

PRECAUTIONARY STATEMENTS
<p style="text-align: center;">Hazards to Humans and Domestic Animals</p> <p>CAUTION: Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.</p> <p>IMPORTANT: Keep granules away from children and pets. Bait may be attractive to dogs. Confine pets during application to prevent them from believing they are being fed.</p> <p>PERSONAL PROTECTIVE EQUIPMENT (PPE) Applicators and other handlers must wear long-sleeved shirt, long pants, shoes plus socks, and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.</p>

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal area below the mean high water mark. Do not contaminate water when disposing of equipment washwater.

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 in a way that will contact workers or other person, 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 (WPS), 40 CFR Part 170. This standard contains the requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers or 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 (REI). The requirements in this box only apply to uses of this product that are covered in the WPS.

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

PPE required for early entry to treated areas that is permitted under the WPS and that involves contact with anything that has been treated such as plants, soil, or water is: Long-sleeved shirt and long pants, shoes plus socks, and chemical-resistant gloves made of any waterproof material.

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 (WPS) 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.

APPLICATION DIRECTIONS

Apply to the soil surface. Granules may be broadcast by air or ground equipment unless specified otherwise on the label. Use a band treatment between rows after formation of edible crop parts. Do not contaminate edible parts.

Best results are obtained if applied in the evening, after irrigation or rain. Do not irrigate for 48 hours after application. Apply when plant damage first appears. Repeat every 2 to 4 weeks or as reinfestation occurs.

Most plants are tolerant to this product. On extremely tender plants such as orchids, the user should make a test application to determine any plant sensitivity before large scale use or broadcast treatment over many plants. Granules of this product may be applied to the following crops to control slugs and snails:

TURF AND ORNAMENTALS (ornamental greenhouses, ornamental plantings, commercial ornamental nurseries, ground covers, turfgrass and grasses grown for sod, Dichondra, and around building foundations):

Apply 3 to 40 ounces to 1 pound per 1,000 sq. ft. (approx. 6 to 32 pellets per square foot).

FIELD CROPS (cereal grains, corn, legumes and mint):

Apply 5 to 40 pounds per acre.

TOBACCO FIELD (field, greenhouse, and lathe house):

Apply 5 to 40 pounds per acre or 1 pound per 1,100 to 8,800 sq. ft.

SEED CROPS (sugarbeets, flower, grasses, vegetable and legume crops grown for seed):

Apply 5 to 40 pounds per acre.

VEGETABLES (asparagus, beans, beets, blackeyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, collards, corn, cowpeas, cucumbers, eggplants, endive, garlic, ginseng, horseradish, kale, kohlrabi, leeks, legumes, lettuce, melons, mustard greens, okra, onion, parsnips, peas, peppers, pimentos, potatoes, pumpkins, radishes, rhubarb, rutabagas, salsify, shallots, spinach, squash, sweet potatoes, Swiss chard, tomatoes, turnips, and watermelons):

Apply 5 to 40 pounds per acre.

ARTICHOKES (by air or ground before tight bud stage or by ground only after tight bud stage):

Apply 9 to 40 pounds per acre.

TREE CROPS (citrus, avocado, cherries, peaches, apricots, apples, pears, bananas, and papaya):

Apply 6.5 to 40 pounds per acre or 2.5 ounces up to 1 pound per 1,000 sq. ft. May be applied in circular band (not less than 6 inches wide) around base of tree trunks.

SMALL FRUIT (blackberries, blueberries, boysenberries, cranberries, loganberries, raspberries, strawberries, and grapes):

Apply 6.5 to 40 pounds per acre or 2.5 ounces up to 1 pound per 1,000 sq. ft. May be applied in circular band (not less than 6 inches wide) around base of tree trunks.

NON-CROP AREAS such as: Fallow land, barrier strips & uncultivated non-agricultural areas; parks & recreational areas; golf courses; brush; railroad; pipeline; highway; power and telephone rights of way; road sides; lumberyards; storage areas; industrial sites; parking lots; airports and similar non-crop areas which may be infested and offer transient harborage to slugs & snails:

Apply 5 to 40 pounds per acre.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store product in original labeled container in a cool, dry, locked place out of reach of children. Keep container tightly closed when not in use. Do not store in direct sunlight.

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: Dispose of empty container in a sanitary landfill, by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY – CONDITIONS OF SALE

Our directions 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 directed, and other influencing factors in the use of this product are beyond the control of the Seller. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with the directions given herewith. To the extent consistent with applicable law, in no case shall the Manufacturer 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 the directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

OPTIONAL MARKETING STATEMENTS:

- Kills snails and slugs fast
- Smaller, highly visible pellets offer more baiting points (than the same weight of competing products)
- Rainfast for up to 30 days (under normal rainfall)
- Protects for up to 4 weeks
- Reduced rate technology
- Low rate technology
- Power pellets
- The power pellets
- The power is in the pellet
- Moisture resistant package
- Spreader Settings

To Apply:	Rate 1	Rate 2	Rate 3	Rate 4
Spreader A				
Spreader B				
Spreader C				

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

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SUBLABEL FOR
CONSUMER USE

SLUG AND SNAIL BAIT

For Control of snails and slugs commonly found in residential yards, lawns, ornamental plantings, fruit and vegetable gardens

ACTIVE INGREDIENT:	
Metaldehyde (2,4,6,8-tetramethyl-1,3,5,7-tetraoxycyclo-octaine).....	4.0%
Other Ingredients:	<u>96.0%</u>
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

See First Aid Below

EPA Reg. No. 19713-389
EPA Est. No. 19713-XX-XXX

Net Content: 8 ozs. to 10 lbs.

FIRST AID
If On Skin: <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If Swallowed: <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
Note to Physician: No specific antidote is available. Treat the patient symptomatically.

USER SAFETY RECOMMENDATIONS Wear long-sleeved shirt and long pants, socks, shoes, and waterproof gloves when applying this product.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not dump leftover pesticide or rinse water into drains or sewers. Do not contaminate water when disposing of equipment washwater.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label and follow all directions and precautions. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Apply before damage occurs as soon as infestation is seen. Repeat application every 2 to 4 weeks or as needed for control. Best results are obtained if applied in the evening, after rain or irrigation.

Home lawns, ground covers, ornamentals beds, around home foundations, home greenhouses and lathe houses:

Apply _____ ounces (or pounds) per _____ sq. ft. (actual statements based on container size and application rate of 2 ounces per 1000 sq. ft.). Sprinkle evenly over soil surface and do not apply in piles. Scatter on and beneath greenhouse benches and in pots but not on foliage.

VEGETABLES (asparagus, beans, beets, blackeyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, collards, corn, cowpeas, cucumbers, eggplants, endive, garlic, ginseng, horseradish, kale, kohlrabi, leeks, legumes, lettuce, melons, mustard greens, okra, onion, parsnips, peas, peppers, pimentos, potatoes, pumpkins, radishes, rhubarb, rutabagas, salsify, shallots, spinach, squash, sweet potatoes, Swiss chard, tomatoes, turnips, and watermelons):

Apply _____ ounces (or pounds) per _____ sq. ft. (actual statements based on container size and application rate of 2 ounces per 1000 sq. ft.). Apply to soil surface around plants – do not apply to the foliage. Do not contaminate edible parts of plants.

Home fruit trees and bushes (citrus, avocado, cherries, peaches, apricots, apples, pears, bananas, papaya, blackberries, blueberries, boysenberries, cranberries, loganberries, raspberries, strawberries, and grapes):

Apply _____ ounces (or pounds) per _____ sq. ft. (actual statements based on container size and application rate of 2 ounces per 1000 sq. ft.). May be applied in a circular band (not less than 6 inches wide) around base of tree trunks.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store product in original container in a dry place inaccessible to children and pets.

PESTICIDE DISPOSAL: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONTAINER DISPOSAL: Do not reuse or refill this container. If **empty**, place in trash or offer for recycling if available. If **partially filled**, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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WARRANTY – CONDITIONS OF SALE

Our directions 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 directed, and other influencing factors in the use of this product are beyond the control of the Seller. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with the directions given herewith. To the extent consistent with applicable law, in no case shall the Manufacturer 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 the directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

OPTIONAL MARKETING STATEMENTS:

- For use on Turf, Ornamentals, Vegetables & Fruits
- Kills snails and slugs fast
- Effective at controlling snails and slugs commonly found on lawns, ornamentals, fruit and vegetables gardens
- Smaller, highly visible pellets offer ore baiting points (than the same weight of competing products)
- Rainfast for up to 30 days (under normal rainfall)
- Rainfast for up to 30 days – rain or shine guaranteed or your money back
- Protects for up to 4 weeks
- Reduced rate technology
- Low rate technology
- Power pellet
- The power is in the pellet
- Approx. 4 pellets per square foot
- Covers _____sq. ft. (label statement base on application rate of 2 ounces per 1000 sq. ft. and actual package size)
- Practical and easy to use (the shaker lid permits very accurate and uniform dosage without requiring you to touch the bait).
- Dust free
- Highly visible pellets help assure proper coverage and prevent over application.
- Offers immediate protection to plants, even though slugs & snails may remain in the area.
- After feeding, slugs & snails dehydrate and die within 2 to 6 days, often crawling to secluded places to die.
- Plant protection will be observed in the decrease in plant damage.
- High palatability = quick attraction: Made with food grade cereal ingredients; manufactured to the highest of standards.
- In controlled tests, preferred 3- to 1- vs. fresh carrots & lettuce.
- Rain and irrigation resistant: Due to exclusive manufacturing techniques, granules of this product resist heavy watering – holding their shape longer than competitive pellets.
- Granules of this product can remain effective and provide protection for up to four weeks!
- When to apply (usage tips): Apply when slugs and snails are active. If ground is dry, water the area before application. This will usually mean treat during periods when evening frost is no longer likely. Check under rocks and other horizontal surfaces in contact with moist soil for snail & slug activity in the early morning. Even a presence of 1 – 2 slugs per square yard can indicate a serious problem. Snails & slugs feed almost entirely at night, so best time to treat is late afternoon or just before dusk and when temperatures are cooler; just before slugs and snails become active. Try not to irrigate for 48 hours after application. Regular application will diminish the recurrence of slug or snail infestation. Retreat if necessary, or if you begin to see recurring damage to your plants.
- Just one slug or snail can hatch up to 40 or 80 eggs, respectively, every 4 – 8 weeks!

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- Where to apply (usage tips): Apply at the edge of the garden or area to be protected to reduce the chances of reinfestation from adjacent areas. Slugs & snails migrate toward better feeding and sheltering conditions, preferring moist shady environments with tender, succulent vegetation close to ground. Use broadcast-type spreader for large areas. Also treat areas where these pests shelter during the day – damp places, around mulch, shady flower gardens, rock formations, ivy patches, hedges, vegetable plants, dichondra lawns, and other ground covers.

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