

19713-627

5/4/2011

10/10



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Luz G. Chan
Drexel Chemical Company
1700 Channel Avenue
P.O. Box 13327

Subject: Notification of Minor Label Change per PR Notice 98-10
EPA Registration No. 19713-627
Submission Date: April 26, 2011
Decision: D448465

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 26, 2011 for product EPA Reg No. 19713-627. The Registration Division (RD) has conducted a review of this request and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records. If you have any questions, please contact Jessica Rogala at (703) 347-0263 or via email at rogala.jessica@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "J. Rogala".

Jessica Rogala
Environmental Protection Specialist
Insecticide-Rodenticide Branch
Registration Division (7505P)

NOTIFICATION

MAY 04 2011



United States
Environmental Protection Agency
Washington, DC 20460

 Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|--|--|
| 1. Company/Product Number 19713-627 | 2. EPA Product Manager Venus Eagle | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) DREXEL CARBARYL 5% BAIT | PM# 1 / Insecticide-Rodenticide Branch | |
| 5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|---|
| <input type="checkbox"/> Amendment - Explain below. | <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION

Submission of label with the statement on the use of flaky bran revised for clarification.
Thank you.

MAY 04 2011

Section - III

| | | | | | |
|---|--|---|-------------------|--|---|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | <input checked="" type="checkbox"/> Plastic |
| | | | | <input type="checkbox"/> Glass | <input checked="" type="checkbox"/> Paper |
| | | | | <input checked="" type="checkbox"/> Other (Specify) <u>Polywoven bag</u> | |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt | No. per container |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container less than 50 pounds; 50 lbs. and greater | | 5. Location of Label Directions <input type="checkbox"/> On the label | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled | | <input type="checkbox"/> Other _____ | | | |

Section - IV

| | | |
|--|----------------------------------|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | |
| Name LUZ G CHAN | Title REGISTRATION MANAGER | Telephone No. (Include Area Code) (901) 774-4370 |
| Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. | | 6. Date Application Received (Stamped) |
| 2. Signature | 3. Title REGISTRATION MANAGER | |
| 4. Typed Name LUZ G CHAN | 5. Date April 26, 2011 | |



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Drexel Chemical Company

April 26, 2011

Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

**Re: Submission of Revised Label
DREXEL CARBARYL 5% BAIT (EPA Reg. No. 19713-627)**

In support of the above, herewith:

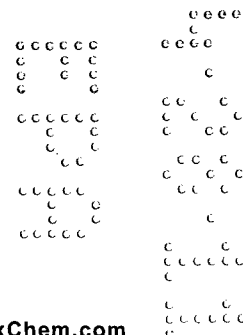
1. Completed EPA Form 8570-1
2. Two copies (one marked) of the label (627SP-0411*P(4/26/11)) with the following change:
 - On page 6, the statement was clarified to read "Use of flaky bran for aerial application is prohibited."
3. Certification statement

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G Chan
Luz G Chan
Registration Manager





CARBARYL 5% BAIT

Insecticide

For the control of cutworms, armyworms, darkling beetles, field crickets, grasshoppers, house crickets, mole crickets, sowbugs, and ants (except carpenter ants, fire ants, harvester ants, and pharaoh ants).

| | |
|--|--------------|
| ACTIVE INGREDIENT: Carbaryl (1-naphthyl N-methylcarbamate)..... | 5.0% |
| OTHER INGREDIENTS: | <u>95.0%</u> |
| TOTAL: | 100.0% |

EPA Reg. No. 19713-627
EPA Est. No. 19713-XX-XXX

Net Content: 50 lbs.

KEEP OUT OF REACH OF CHILDREN
CAUTION

See First Aid on Page 2

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

627SP-0411*P(4/26/11)

| |
|---|
| FIRST AID |
| This product is an N-methyl carbamate that inhibits cholinesterase. |
| 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. |
| If on Skin or Clothing: <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 for doctor or treatment advice. |
| If In Eyes: <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice. |
| <p>Have the container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.</p> |
| <p>NOTE TO PHYSICIAN: Carbaryl is an N-methyl carbamate that inhibits cholinesterase. Atropine is antidotal. Do not use 2-PAM (pyridine-2-aldoxime methiodide), opiates or cholinesterase inhibiting drugs. Probable mucosal damage may contraindicate the use of gastric lavage.</p> |

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| PRECAUTIONARY STATEMENTS |
| Hazards to humans and Domestic Animals |
| <p>CAUTION: Harmful if swallowed or if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing.</p> |
| <p>PERSONAL PROTECTIVE EQUIPMENT (PPE) Some materials that are chemical-resistant to this product are natural rubber, polyethylene or neoprene. If you want more options, follow the instructions for Category A on an EPA chemical-resistance category selection chart.</p> |
| <p>Loaders, applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks.</p> <p>In addition, handlers loading baits into airplanes under the auspices of the Animal Plant Health Inspection Service (APHIS) Rangeland Grasshopper and Mormon Cricket Suppression Program, and allied state programs must wear a NIOSH-approved dust/mist filtering respirator with NIOSH/MSHA approved number prefix TC-21C or a NIOSH-approved respirator with any N, R, P or HE filter.</p> |
| <p>Aerial application is prohibited, except for the aerial applications under the auspices of the Animal Plant Health Inspection Service (APHIS) Rangeland Grasshopper and Mormon Cricket Suppression Program, and/or allied state programs.</p> |
| <p>See Engineering Controls for additional requirements and exceptions.</p> |
| <p>USER SAFETY REQUIREMENTS: 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> |

ENGINEERING CONTROLS

Pilots applying applications under the auspices of the Animal Plant Health Inspection Service (APHIS) Rangeland Grasshopper and Mormon Cricket Suppression Program or related state programs must use an enclosed cockpit in a manner that is consistent with the WPS for Agricultural Pesticides [40 CFR 170.240(d)(6)]. In addition, the cockpit air intake must be located above the bait release point and the bait bin must be completely separate from the cockpit.

Flaggers supporting aerial applications permitted above must use an enclosed cab that meets the definition in the WPS for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection. In addition, flaggers must:

- wear long-sleeved shirt, long pants, shoes, and socks,
- either wear with NIOSH/MSHA approval number prefix NIOSH/MSHA approved number prefix TC-21C or a NIOSH-approved respirator with any N, R, P or HE filter or use an enclosed cab that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as this type of respirator,
- be provided and have immediately available for use in an emergency when they must exit the cab in the treated area: chemical-resistant gloves and chemical resistant headgear and, if using an enclosed cab that provides respiratory protection, a respirator of the type specified above,
- take off any PPE that was worn in the treated area before reentering the cab, and
- store all such PPE in a chemical-resistant container such as a plastic bag, to prevent contamination of the inside of the cab.

When applicators use enclosed cabs in a manner that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(5)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of the gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic 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 apply when weather conditions favor drift from the area treated. Drift and runoff may kill aquatic invertebrates in water adjacent to treated areas. Do not contaminate water by cleaning equipment or disposal of wastes. Do not contaminate water when disposing of equipment washwaters.

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 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 (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), restricted-entry interval (REI) and notification to workers. 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. The REI for carbaryl is 12 hours unless otherwise specified in the directions for use associated with each crop.

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: Coveralls over long-sleeved shirt and short pants, chemical-resistant gloves made of any waterproof material, chemical-resistant footwear plus socks, chemical-resistant headgear if overhead exposure.

When the REI for a crop is 7 days or longer, you must notify workers of the application by warning them orally and by posting warning signs at entrances to treated area.

USE INFORMATION

This product is used for the control of cutworms, armyworms, darkling beetles, field crickets, grasshoppers, house crickets, mole crickets, sowbugs, and ants (except carpenter ants, fire ants, harvester ants, and pharaoh ants).

IMPORTANT PRE-HARVEST AND GRAZING INFORMATION

Tolerances established under the Federal Food, Drug and Cosmetic Act permit the sale of crops bearing probable carbaryl residues when carbaryl is used in accordance with the label directions.

If carbaryl is used in accordance with label directions, carrot tops, corn forage, and sugar beet tops may be grazed or harvested for use as feed for dairy and meat animals without resulting in illegal residues in milk or meat.

METHOD OF APPLICATION

This product must be applied only by ground using a mechanical spreader or underground shank applicator. DO NOT apply by hand, spoon, belly grinder, backpack spreader, shaker can, power backpack sprayers, tree injection, and ALL handheld foggers. **EXCEPTION:** Aerial applications only to rangeland are allowed only under the auspices of the Animal Plant Health Inspection Service (APHIS) Rangeland Grasshopper and Mormon Cricket Suppression Program and/or allied state programs.

| CROP | SPECIFIC USE INSTRUCTIONS / RESTRICTIONS |
|---|--|
| Asparagus | <p>Application to Spears: Apply 20 lbs. per acre per application. Maximum yearly usage is 60 lbs. per acre.</p> <p>Application to Ferns (after harvest of spears): Apply 40 lbs. per acre per application. Maximum yearly usage is 80 lbs. per acre.</p> <p>Use Restrictions: Total combined maximum application for spears and ferns is 100 lbs. per acre per year. Minimum retreatment interval is 3 days. Do not apply within 1 day of harvest. Do not apply more than 3 times to spears and 2 times to ferns.</p> |
| Garden beets (roots), Carrots, Horseradish, Parsnips, Radish, Rutabaga, Salsify, Turnips (roots) | <p>Apply 40 lbs. per acre per application. Maximum yearly usage is 120 lbs. per acre.</p> <p>Use Restrictions: Minimum retreatment interval is 7 days. Do not apply within 7 days of harvest. Do not apply more than 3 times per year.</p> |
| Garden beets (tops), Turnips (tops) | <p>Apply 40 lbs. per acre per application. Maximum yearly usage is 120 lbs. per acre.</p> <p>Use Restrictions: Minimum retreatment interval is 7 days. Do not apply within 14 days of harvest. Do not apply more than 3 times per year.</p> |
| All members of the Head and Stem Brassica vegetables Subgroup 5A including: Broccoli, Brussels sprouts, Cabbage, Cauliflower, Cavalo broccolo, Chinese broccolo (gai lon), Chinese cabbage (napa), Chinese mustard cabbage (gai choy), Kohlrabi | <p>Apply 40 lbs. per acre per application. Maximum yearly usage is 120 lbs. per acre.</p> <p>Use Restrictions: Apply only within 30 days of crop emergence or transplanting. Minimum retreatment interval is 7 days. Do not apply within 3 days of harvest. Do not apply more than 3 times per year.</p> |
| All members of the Brassica leafy vegetables Subgroup 5B: Chinese cabbage (bok choy), Collards, Kale, Mizuna, Mustard greens, Mustard spinach, Rape greens, Turnip greens | <p>Apply 40 lbs. per acre per application. Maximum yearly usage is 120 lbs. per acre.</p> <p>Use Restrictions: Apply only within 30 days of crop emergence or transplanting. Minimum retreatment interval is 7 days. Do not apply within 14 days of harvest. Do not apply more than 3 times per year.</p> |
| Corn (Field, Pop) (REI* = 24 hrs.) | <p>Apply 40 lbs. per acre per application. Maximum yearly usage is 160 lbs. per acre.</p> <p>Use Restrictions: Minimum retreatment interval is 14 days. Do not apply within 14 days of harvest of forage or silage. Do not apply more than 48 days of harvest of grain or fodder. Do not apply more than 4 times per year.</p> <p>*REI is 24 hours. Exception: the REI is 21 days for workers detasseling corn. Hand harvesting is prohibited.</p> |
| Corn (Sweet) (REI* = 24 hrs.) | <p>Apply 40 lbs. per acre per application. Maximum yearly usage is 320 lbs. per acre.</p> <p>Use Restrictions: Minimum retreatment interval is 3 days. Do not apply within 2 days of harvest of ears. Do not apply within 14 days of harvest of forage. Do not apply more than 48 days of harvest of fodder. Do not apply more than 8 times per year.</p> <p>*REI is 24 hours. Exception: the REI is 21 days for workers detasseling corn. Hand harvesting is prohibited.</p> |

| CROP | SPECIFIC USE INSTRUCTIONS / RESTRICTIONS |
|--|--|
| All members of the Cucurbit Vegetable Group 9 including: Chayote (fruit), Chinese waxgourd, Citron melon, Cucumber, Gherkin, Gourd (edible), <i>Momordica</i> spp. (includes balsam apple, balsam pear, bitter melon, Chinese cucumber), Pumpkin, Squash (includes summer types such as crookneck, scallop, straightneck, vegetable marrow, zucchini and winter types such as acorn, butternut, calabaza, cushaw, Hubbard, spaghetti squash), Melons | Apply 20 lbs. per acre per application. Maximum yearly usage is 120 lbs. per acre. |
| | Use Restrictions: Minimum retreatment interval is 7 days. Do not apply within 3 days of harvest. Do not apply more than 6 times per year. |
| Pistachios (non-bearing trees only) | Apply 40 lbs. per acre per application. Maximum yearly usage is 200 lbs. per acre. If weeds or cover crops bloom is present, mow orchard or between rows prior to applying this product. |
| | Use Restrictions: Minimum retreatment interval is 7 days. Use only on trees that will not bear fruit for 1 year from date of application. |
| Potatoes | Apply 40 lbs. per acre per application. Maximum yearly usage is 120 lbs. per acre. |
| | Use Restrictions: Minimum retreatment interval is 7 days. Do not apply within 7 of harvest. Do not apply more than 3 times per year. |
| Sugar beets | Apply 30 lbs. per acre per application. Maximum yearly usage is 60 lbs. per acre. |
| | Use Restrictions: Minimum retreatment interval is 14 days. Do not apply within 28 days of harvest of roots or forage. Do not apply more than 2 times per year. |
| All members of the Fruiting Vegetable Group 8 including: Eggplant, Groundcherry, Pepinos, Peppers, Tomatillo, Tomato | Apply 40 lbs. per acre per application. Maximum yearly usage is 160 lbs. per acre. |
| | Use Restrictions: Minimum retreatment interval is 7 days. Do not apply within 3 days of harvest. Do not apply more than 4 times per year. |
| Pasture and Grasses grown for hay or seed | Apply 30 lbs. per acre per application. Maximum yearly usage is 60 lbs. per acre. |
| | Use Restrictions: Minimum retreatment interval is 14 days. Do not apply within 7 days of harvest or grazing. Do not apply more than 2 times per year. |
| Rangeland | <p>Ground Application Only: Apply 20 lbs. per acre by ground application only. Use Restriction: Do not apply more than once per year.</p> <p>USDA Aphis Program for Mormon Cricket and Grasshopper Suppression: Apply 4 lbs. per acre per application. Maximum yearly usage is 8 lbs. per acre. Use Restrictions: Minimum retreatment interval is 14 days. Do not apply more than 2 times per year. Use of flaky cereal grain bait for aerial application is prohibited. Aerial application is allowed ONLY through USDA Aphis and affiliated state grasshopper and Mormon Cricket suppression programs.</p> |

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original container only and keep sealed. Store in a cool, dry and closed storage area. Keep container tightly closed when not in use. Reduce stacking height where local conditions such as humidity or pallet overhang can affect package strength. Observe precautions when moving, opening, pouring or closing.

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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or 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.