

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Luz G. Chan Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 NOTIFICATION APR 2 8 2014

Subject:

Notification to incorporate corrections into the label and add a "Resistance

Management" section

Drexel Carbaryl 2% Bait/Granule EPA Registration # 19713-630 Submission Date: March 19, 2014

Dear Luz G. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 received March 19, 2014. The Registration Division (RD) has reviewed these requests and finds that this action 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,

Jessica Rogala

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

4. Typed Name

LUZ G CHAN

March 17, 2014

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March 17, 2014

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 Corrections on the Label Accepted by the Agency on April 18, 2011 DREXEL CARBARYL 2% BAIT/GRANULE (EPA Reg. No. 19713-630)

Sir/Madam:

Herewith:

- 1. Completed EPA Form 8570-1
- Two (marked and clean) copies of the label (630SP-0314*P) correcting the following oversight in the EPA Stamped Accepted label dated April 18, 2011:
 - In the First Aid box, under "If on Skin or Clothing", the statement was corrected to read "Call a
 poison control center or doctor for treatment advice."
 - Under the Precautionary Statements, "....NIOSH/MSHA approved number..." was corrected to read "....NIOSH/MSHA approval number..."
 - Under Engineering Controls, the second bullet point was corrected to read "either wear a NIOSH
 approved dust/mist filtering respirator with NIOSH/MSHA approval number prefix TC-21C...."
 - On page 7, under Potatoes, "...within 7 of harvest." was corrected to "...within 7 days of harvest."
 - On page 14, "Broccoli" that was inadvertently left of the PHI column was reinstated and the total number of applications per crop was corrected from 6 to 4.

In addition, the following label updates were made:

- Under "Use Information", "This product is used..." was changed to read "Carbaryl 2% Bait/Granule is used...."
- "Resistance Management" section was added on page 5 of the AG Use label and the corresponding IR box was placed on page 2.

"lbs." was changed to read "pounds" in various places.

- On page 7, in the Cucurbit Vegetables box, "Melons" appearing at the end of the Cucurbit Vegetable box was moved before "Momordica spp.", for easy reading.
- In the Storage and Disposal box, per the Label Review Manual, "Pesticide Storage" and Container Disposal" were changed to read "Storage" and Container Handling", respectively.
- The trademark ownership statement was also corrected from "...respective owners." to "...respective holders."

The above changes were highlighted for easy reference.

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 and Chan

Luz & Chan

Registration Manager

MASTER LABEL CONSISTING OF:

1) LABEL FOR AGRICULTURE USE 2) LABEL FOR OUTDOOR RESIDENTIAL USE



CARBARYL 2% BAIT/GRANULE

NOTIFICATION APR 2 8 2014



630MSP-0314*P

LABEL FOR AG USE

GROUP 1A INSECTICIDE



Carbaryl 2% Bait/Granule

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)	2.0%
OTHER INGREDIENTS:	98.0%
TOTAL:	100.0%

CAUTION

See First Aid on Page 3

EPA Reg. No. 19713-630 EPA Est. No. 19713-XX-XXX

Net Content: 100 pounds

Manufactured By:



The Drexel logo is a registered trademark of Drexel Chemical Company.

630MSP-0314*P

FIRST AID

This product is an N-methyl carbamate that inhibits cholinesterase.

IF SWALLOWED:

- 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.

II ON SKIN OR CLOTHING:

- 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 IN EYES:

- 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.

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

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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or if absorbed through skin. Avoid contact with eyes, skin, or clothing.

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.

Loaders, applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks.

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 approval number prefix TC-21C or a NIOSH-approved respirator with any N, R, P or HE filter.

Aerial application is prohibited, except for the aerial applications under the auspices of the Arimal Plant Health Inspection Service (APHIS) Rangeland Grasshopper and Mormon Cricket Suppression Program, and/or allied state programs.

See Engineering Controls for additional requirements and exceptions.

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.

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 a NIOSH-approved dust/mist filtering respirator with NIOSH/MSHA approval 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 farough 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.

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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 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), 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

CARBARYL 2% BAIT/GRANULE 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).

RESISTANCE MANAGEMENT

GROUP 1A INSECTICIDE

CARBARYL 5% BAIT contains a Group 1A insecticide. Insect biotypes with acquired resistance to Group 1A may eventually dominate the insect population if Group 1A insecticides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by this product or other Group 1A insecticides.

To delay insecticide resistance, consider:

- Avoiding the consecutive use of this product or other Group 1A insecticides that have similar target site of action on the same insect species.
- Using tank mixtures or premixes with insecticides from a different target site action Group as long as the involved products are all registered for the same use and have different sites of action.
- Basing insecticide use on a comprehensive IPM program.
- Monitoring treated insect populations for loss of field efficacy.
- Contacting your local extension specialist, certified crop advisors, and/or manufacturer for insecticide resistance management and/or IPM recommendations for specific site and resistant pest problems.

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 may be applied only by ground using a mechanical spreader or underground shank applicator. DO NOT apply by hand, spoon or belly grinder. **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	Application to Spears: Apply 50 pounds per acre per application. Maximum yearly usage is 150 pounds per acre. Application to Ferns (after harvest of spears): Apply 100 pounds per acre per application. Maximum yearly usage is 100 pounds per acre.			
	Use Restrictions: Total combined maximum application for spears and ferns is 250 pounds 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.			
Garden beets (roots), Carrots, Horseradish, Parsnips, Radish, Rutabaga, Salsify, Turnips (roots)	Apply 100 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.			
, , , , , , , , , , , , , , , , , , , ,	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.			
Garden beets (tops), Turnips (tops)	Apply 100 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.			
	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.			
All members of the Head and Stem Brassica vegetables Subgroup 5A	Apply 100 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.			
including: Broccoli, Brussels sprouts, Cabbage, Cauliflower, Cavalo broccolo, Chinese broccoli (gai lon), Chinese cabbage (napa), Chinese mustard cabbage (gai choy), Kohlrabi	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.			
All members of the Brassica leafy vegetables Subgroup 5B: Chinese	Apply 100 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.			
cabbage (bok choy), Collards, Kale, Mizuna, Mustard greens, Mustard spinach, Rape greens, Turnip greens	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.			
Corn (Field, Pop)	Apply 100 pounds per acre per application. Maximum yearly usage is 400 pounds per acre.			
(REI* = 24 hrs.)	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. *REI is 24 hours. Exception: the REI is 21 days for workers detasseling com. Hand harvesting is prohibited.			
Corn (Sweet)	Apply 100 pounds per acre per application. Maximum yearly usage is 800 pounds per acre.			
	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.			
(REI* = 24 hrs.)	*REI is 24 hours. Exception: the REI is 21 days for workers detasseling corn. Hand harvesting is prohibited.			

All members of the Cucurbit Vegetable Group 9 including:	Apply 50 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.				
Chayote (fruit), Chinese waxgourd, Citron melon, Cucumber, Gherkin, Gourd (edible), Melons, Momordica 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),	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.				
Grain Sorghum	Apply 98 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.				
	Use Restrictions: Minimum retreatment interval is 7 days. Do not apply more than 4 times per year.				
Pistachios (non-bearing trees only)	Apply 100 pounds per acre per application. Maximum yearly usage is 500 pounds 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.				
Potatoes	Use only on trees that will not bear fruit for 1 year from date of application. Apply 100 pounds per acre per application. Maximum yearly usage is 300 pounds per acre.				
	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.				
Sugar beets	Apply 30 pounds per acre per application. Maximum yearly usage is 60 pounds per acre. Use Restrictions: Minimum retreatment interval is 14 days. Do not apply within 28				
All members of the Fruiting Vegetable Group 8 including: Eggplant,	days of harvest of roots or forage. Do not apply more than 2 times per year. Apply 100 pounds per acre per application. Maximum yearly usage is 400 pounds per acre.				
Groundcherry, Pepinos, Peppers, Tomatillo, Tomato	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 up to maximum of 75 pounds per acre per application. Maximum yearly usage is 150 pounds 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	Ground Application Only: Apply up to a maximum of 50 pounds per acre. Use Restrictions: Do not apply more than once per year. USDA Aphis Program for Mormon Cricket and Grasshopper Suppression: Apply 10 pounds per acre per application. Maximum yearly usage is 20 pounds per acre. Use Restrictions: Minimum retreatment interval is 14 days. Do not apply more than 2 times per year. Use of flaky bran bait for aerial application is prohibited. Aerial application is allowed ONLY through USDA Aphis and affiliated state grasshopper and Mormon Cricket suppression programs.				

STORAGE AND DISPOSAL

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

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 Handling: 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.

LABEL FOR OUTDOOR RESIDENTIAL USE



Carbaryl 2% Bait/Granule

Insecticide

FOR OUTDOOR RESIDENTIAL USE ONLY

ACTIVE INGREDIENT: Carbaryl (1-naphthyl N-methylcarbamate)	2.0%
OTHER INGREDIENTS:	98.0%
TOTAL:	100.0%

CAUTION

See First Aid on Page 10

NOTIFICATION APR 2 8 2014

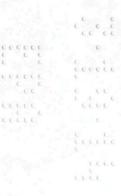
EPA Reg. No. 19713-630 EPA Est. No. 19713-XX-XXX

Net Content: 10 pounds

Manufactured By:

Drexel Chemical Comp

P.O. BOX 13327, MEMPHIS, TN 38113-0327 SINCE 1972



FIRST AID

This product is an N-methyl carbamate that inhibits cholinesterase.

IF SWALLOWED:

- 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:

- 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 IN EYES:

- 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.

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.

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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wear long-sleeved shirt and long pants, shoes plus socks, and chemical-resistant gloves (household or latex rubber gloves) when handling this product. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash hands before eating, drinking, chewing gum, tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic invertebrates. Do not apply directly to water or allow drift to water. To protect the environment, do not allow pesticide to enter or runoff into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

DIRECTIONS FOR USE

Read the entire label before using this product.

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not allow people or pets to enter the treated area until dusts have settled. Do not allow people (except those involved in the watering-in) or pets to enter the treated area until the watering-in is completed and the area has dried.

Do not apply this product in a way that will contact any person or pet either directly or through drift. Keep people and pets out of the area during application.

For outdoor use only.

Do not apply by hand, spoon, or belly grinder.

Product must be watered-in immediately following application.

Not for use on plants grown for sale or commercial use, research or commercial seed production.

LAWNS, ORNAMENTAL AND RECREATIONAL TURF

Use this product when insect pests first appear and/or plant damage is imminent. For best results, first mow the lawn and then apply this product uniformly to dry turfgrass with a spreader. Repeat applications as necessary but not to exceed 4 times per year at minimum 7 day intervals.

Will kill target pests that are present only at the time of application. Pests must be directly contacted for this product to be effective.

PEST	This Product per 1000 sq. ft. (Lbs.)	Use Instructions
Ants (excluding harvester, carpenter, and pharaoh ants); Armyworms; Centipedes; Chiggers; Chinch bugs; Cutworms; Earwigs; Essex skipper; European chafer; Fall armyworm; Fiery skipper; Grasshoppers; Green June beetle larvae; Leafhoppers; Leafrollers; Lucerne moth; Millipedes; Scarab beetles (adults) such as Green June beetles, May beetles, Japanese beetles, June beetles; Sod webworms (Lawn moths); Sowbugs; Spittlebugs; Springtails; Yellowstriped armyworms	2.25	Immediately water-in the product following application. For heavy infestations of Chinch bugs, increase the rate of this product to 5 pounds per 1000 square feet. Treat the entire area. To kill subsurface pests effectively, apply when they are actively feeding near the soil surface, usually during late March through May, or July through early
Billbug larvae; European crane fly larvae; Fleas; White grubs such as Japanese beetle larvae, Chafer beetle larvae, Phyllophaga spp. larvae, annual White grubs, Black turfgrass ataenius beetle larvae, Hyperodes weevil (bluegrass weevil larvae)	9	September, or as guided by local agricultural extension service agents.
Scorpions	5	
Fleas	7 to 9	
Ticks	1.15	

TICKS THAT MAY VECTOR LYME DISEASE

To kill juvenile and adult *Ixodes* spp. ticks (Deer ticks, Black legged ticks) and Lone star ticks which may vector Lyme disease, apply 1.15 pounds of this product per 1000 square feet with a spreader to ensure uniform coverage. Target applications to kill juvenile ticks (larvae and nymphs) in late Spring or early Summer (May/June). Adult Ticks can be killed with late Summer and Fall applications (August/September). Apply to lawns, ornamental plantings, shrub beds, wooded areas and around outside perimeters of home and other buildings. Treat entire lawn and perimeter wooded areas and property boundaries where exposure to Ticks may occur. Irrigate treated areas, thoroughly after application to move the chemical down into the thatch. Ticks may be reintroduced from surrounding areas or host animals. Repeat applications as necessary up to a maximum of 4 times per year at minimum 7 day intervals. Will kill target pests that are present only at the time of application. Ticks must be directly contacted for this product to be effective.

FLOWERS AND SHRUBS (ORNAMENTAL PLANTINGS) IN LANDSCAPE AND FOUNDATION PLANTINGS

PEST*	This Product per 1000 sq. ft. (Lbs.)	Application to wet foliage during periods of high humidity may cause injury to tender foliage.			
Ants (except Carpenter, Harvester and Pharaoh ants); Armyworms; Centipedes; Crickets; Cutworms; Earwigs; Firebrats,; Silverfish; Spiders	2.25 to 5				
Fleas	Apply 7 to 9 Apply a 6-				
Scorpions	5	a creat barra arearra trio memo,			
Ticks	1.15	flowerbeds and shrubs, foundation ornamental plantings and lawn or s areas immediately adjacent to the home. Thoroughly water treated are after application.			
		Repeat as necessary but not to exceed 3 times per year at minimum 7 day intervals. Do not use on plants above chest height.			

NUISANCE PESTS AROUND THE OUTSIDE OF HOMES, PATIOS, PORCHES AND BUILDINGS

To kill the following pests:

contacted for this product to be effective.

PEST*	This Product per 1000 sq. ft. (Lbs.)	Use Instructions		
Ants (except Carpenter, Harvester and Pharaoh ants); Armyworms; Centipedes; Crickets; Cutworms; Earwigs; Firebrats; Millipedes; Silverfish; Sowbugs (Pillbugs); Spiders	2.3	Apply this product uniformly using a spreader in an 8-foot band around the outside perimeter of home. Apply this product to shrub and flower beds, foundations, ornamental plantings and		
Fleas	4 to 9	lawn or soil areas immediately		
Ticks	1.15	adjacent to the home. Thoroughly		
Scorpions	5	water treated areas after application. Repeat as necessary but not to exceed 4 times per year at minimum 7 day intervals.		

*Will kill target pests that are present only at the time of application. Pests must be directly contacted for this product to be effective.

NUISANCE PESTS IN STRAWBERRIES AND LISTED GARDEN VEGETABLES

To kill Ants (except Carpenter, Harvester and Pharaoh ants); Centipedes, Crickets, Cutworms; Earwigs; Grasshoppers; Millipedes; Sowbugs (Pillbugs); and Springtails, apply this product with a spreader at the rates given in the following table. Begin applications when pest or damage is observed and repeat as directed below. Water lightly after application to release the chemical from the granules.

Retreatment intervals (days between treatments) and other restrictions are found listed in the following table.

Observe the listed pre-harvest intervals (PHI) which is the number of days between last application and harvest, for application during the growing season.

Crop	This Product per 1000 sq. ft. (pounds)	Maximum Yearly Application (pounds/1000 sq. ft.)	Retreatment Interval (Days)	PHI (days)	Remarks
Asparagus (Spears)	2.3	6.9	3 .	1	Total maximum seasonal application rate is 11.5 pounds per 1000 square feet
Asparagus (Ferns*)	2.3	4.6	7	1	per crop. The total number of application is 3 before harvest with 2 additional applications only to ferns. *After harvest of spears.
Edible-podded legume vegetables including Jack beans, Snap beans, Wax beans, Yardlong beans, Edible pod pea, Snow pea, Sugar snap pea; Dried-shelled beans and peas including Adzuki beans, Field beans, Kidney beans, Lima beans (dry), Mung beans, Navy beans, Pinto beans, Blackeyed peas, Cowpeas, Southern peas, Lentils (dry)	1.7	6.9	7	3 (edible- podded) 21 (dried shelled)	Total number of applications per crop can be 4. Use on succulent beans or peas is prohibited.

continuation) Crop	This Product per 1000 sq. ft. (pounds)	Maximum Yearly Application (pounds/1000 sq. ft.)	Retreatment Interval (Days)	PHI (days)	Remarks
Carrots, Garden beets (roots), Horseradish, Parsnips, Radishes, Rutabaga, Salsify, Turnips (roots)	1.2 to 2.3	6.9	7	7	Total number of applications per crop can be 6 (some of which must be lower than the maximum single application rate).
Brussels sprouts, Broccoli, Cabbage, Cauliflower, Chinese cabbage, Collards, Kale, Kohlrabi, Mustard greens	1.7 to 2.3	6.9	7	3 (Broccoli, Brussels sprouts, Cabbage, Cauliflower, Kohlrabi) 14 (Chinese cabbage, Collards, Kale, Mustard greens)	Total number of applications per crop can be 4 (some of which must be lower than the maximum single application rate). Application is only permitted within 30 days of crop emergence or the date of planting.
Cucumber, Melons, Squash	1.2	6.9	7	3	Total number of applications per crop can be 6.
Garden beets (tops), Turnips (tops)	2.3	6.9	7	14	Total number of applications per crop can be 3.
Potatoes .	2.3	6.9	7	7	Total number of applications per crop can be 3.
Strawberries	2.3	11.5	7	7	Total number of applications per crop can be 5.
Tomato, Eggplant, Pepper	2.3	9.2	7	3	Total number of applications per crop can be 4.

This product is applied using a ground spreader. Spreaders and settings are found below. Do not repeat applications more often than indicated above. [Add/delete or adjust settings as appropriate].

	Spreade	er Settings	
Spreader	Pounds Per 1000 sq. ft.		
	2.3 Pounds	4.6 Pounds	
Scotts Even Green 18"	15	16*	
Scotts Speedy Broadcast	14	15*	
Red Devil Broadcast	12	13*	
Red Devil Drop 20"	12	13*	
Republic EZ Drop 18"	8	10	
Republic EZ Broadcast	9	13*	
Republic EZ Tractor Broadcast	9	13*	
Other Spreaders as appropriate	TBD	TBD	

^{*}This number indicates a criss-cross application will be required to apply the number of pounds shown for 1000 square feet.

[Alternative Spreader Settings for Peanut Hulls Formulation]

Spreader	Туре	Rate (Lbs./1000 sq. ft.)	Setting
Scotts Precision Green	Drop	2.2.5	8
P4		4.6	11
		6.8	14
		9.2	16.5
Cyclone Rotary	Rotary	2.25	5
		4.6	6
		6.8	8
		9.2	N/A*
Earthway Rotary	Rotary	2.25	14
		4.6	18
		6.8	27
		9.2	N/A*
Earthways EV-N-Spred	Rotary	2.25	14
		4.6	18
		6.8	27
		9.2	N/A*
Republic EZ	Drop	2.25	9
	5100	4.6	12
		6.8	13
		9.2	13
Scotts Speedygreen 3000	Rotary	2.25	8
cooks operaygreen ever	1,0,0,1	4.6	N/A*
		6.8	N/A*
		9.2	
Craftsman Rotary (0195)	Rotary	2.25	6 0000
oranoman rotal y (0 100)	riotary	4.6	10
		6.8	15
		9.2	
Precision EZ Spread SB550	Rotary	2.25	7
1 Toolsion LZ opredu obooo	rotary	4.6	9
		6.8	N/A*
		9.2	N/A*

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Spreader	Type	Rate (Lbs./1000 sq. ft.)	Setting
Pursell's Sta-Green SB4500	Drop	2.2.5	3
		2.33	3.2
		4.6	4
		6.8	N/A*
		9.2	
Agri-Fab 85 lb. Spreader Model #4503123062	Rotary	2.25	6
		4.6	7
		6.8	8
		9.2	10
Craftsman Model #486-19760	Drop	2.25	5
		2.33	5.25
		4.6	7
Scott Accugreen Model AG-3	Drop	2.25	8
		2.33	9
		4.6	12
Scott Speedygreen Model 1000	Rotary	2.25	3.75
		2.33	4
		4.6	7

STORAGE AND DISPOSAL

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

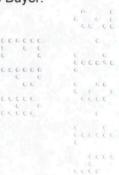
STORAGE: Store in original container only and keep sealed. Store in a cool, dry and closed storage area away from children and animals. Keep container tightly closed when not in use.

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

CONTAINER HANDLING: Nonrefillable container. 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.

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:

- Easy to use granules
- Kills Japanese beetles
- Slow release granules
- Kills numerous [Over 30] listed pests on lawns and ornamentals
- Covers up to _____ square feet [sq. ft.]
 Use on lawns, ornamentals and around home
- For home lawns
- · For use on vegetables and fruits
- For outdoor use only
- To kill fire ants, Ticks (including those that may vector Lyme disease)

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