



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

SEP 1 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Barbara J. Varner
Director, Regulatory Affairs
Unicorn Laboratories
12385 Automobile Blvd
Clearwater, FL 33762

Subject: Label Amendment: Response to Agency's comments of January 24, 2003
UNICORN Carbaryl Insecticide 5% Dust
EPA Reg. No. 28293-237
Resubmission dated April 15, 2003, "acceptable with comments"

Dear Ms. Varner:

The Agency has reviewed your submission for a revised label, and the following comments apply:

- 1) Avoid breathing spray mist must be replaced with "avoid breathing dust" under the precautionary statements
- 2) In the sentence "Sensitivities may occur after using ANY pesticide product for pets" the ANY must be replaced with THIS under the precautionary statements
- 3) The Storage Statement "Do not put concentrate or diluteis inappropriate for this dust formulation and should be deleted.
- 4) "Reapply every week if necessary" for dogs and cats must be changed to "reapply every month as necessary" to comply with the 30 days restriction of treatment/exposure to cholinesterase inhibiting pesticides.

A stamped copy of the label "accepted with comments" is enclosed for your records.

Please submit two (2) copies of the final printed label for our files prior to releasing the product for shipment. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink, which appears to read "Akiva Abramovitch", is written over the typed name.

Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch
Registration Division (7505C)

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**UNICORN
CARBARYL INSECTICIDE 5% DUST**

KILLS GARDEN PESTS, FLEAS & TICKS

**IN THE GARDEN: Armyworms, Cutworms, Squash Bugs,
Tomato Hornworms, certain other Beetles
and other Garden Pests, as listed.**

**ON DOGS AND CATS: Fleas and Ticks on Animals
and other outdoor living areas.**

ACTIVE INGREDIENT:

Carbaryl (1-naphthyl N-methylcarbamate)..... 5%

INERT INGREDIENTS:..... 95%

Total: 100%

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

SEP 1 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

28293-237

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back/Side Panel for Additional Precautionary Statements.

Net Weight:

Manufactured by:

Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 33762
(727) 578-4545

- READ ENTIRE LABEL BEFORE EACH USE.
- FOR PET USE - USE ONLY DOGS OR CATS.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Causes moderate eye irritation. Harmful if inhaled. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling. Keep out of reach of children and domestic animals. Avoid contamination of food, feed, feeding troughs and water receptacles. Sensitivities may occur after using **ANY** pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amount of water. If signs continue, consult a veterinarian immediately. Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. However, flea and tick collars may be immediately replaced.

USER SAFETY REQUIREMENTS

- Wear long-sleeved shirt, long pants, shoes plus socks and household latex or rubber gloves when applying this product.
- Change clothing as soon as possible after use.
- Wash the outside of gloves before removing. As with any pesticide product, wash hands thoroughly immediately after handling and before eating, smoking or using the toilet.
- Do not allow children or pets to contact treated area until dust has settled.

FIRST AID

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 IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 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.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378, National Pesticides Information Center, for emergency medical treatment information.

NOTE TO PHYSICIAN AND VETERINARIAN

Carbaryl is an N-methyl carbamate that inhibits cholinesterase. Atropine is antidotal.

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Environmental Hazards

This product is extremely toxic to aquatic and estuarine invertebrates. 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. **USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.**

Wearing household latex or rubber gloves, use a dust applicator such as a shaker can, dust gun, puffer or other bulbous duster, rotary duster or other appropriate duster as available. Dust lightly to cover both upper and lower leaf surfaces with a thin, even film of dust. **Apply when air is calm to avoid drift and contact with eyes and skin.**

Start applying at the farthest corner of the treatment area and work backward to avoid contact with dusted surfaces. Allow dust to settle in treated area before reentering. For plants above chest height, consider using a liquid carbaryl product. Do not repeat application more than once a week.

Apply dust at the first signs of insects. Observe the preharvest intervals specified for each crop.

BEANS: Mexican Bean Beetle - 1/4 lb. per 1,000 sq. ft. Leafhoppers, Bean Leaf Beetle, Cucumber Beetles, Western Bean Cutworm, Velvetbean Caterpillar, Flea Beetles, Japanese Beetle - Do not apply within 3 days of harvest for fresh beans or within 21 days of harvest for dried beans. 1/2 lb per 1,000 sq. ft. Corn Earworm, Armyworm, Tarnished Plant Bug, Stink Bugs - 3/4 lb. per 1,000 sq. ft.

CABBAGE, BROCCOLI, BRUSSELS SPROUTS, CAULIFLOWER AND KOHLRABI: Flea Beetles, Harlequin Bug - 1/2 lb. per 1,000 sq. ft. Armyworms, Imported Cabbageworm, Young Cabbage Loopers, Salt Marsh Caterpillars, Corn Earworm - 1 lb. per 1,000 sq. ft. Do not apply within 3 days of harvest.

CORN: Corn Earworm (Application of this product to the tassel region of corn during the pollen shed period will seriously reduce bee populations). **Corn Rootworm Adults, European Corn Borer, Fall Armyworm, Sap Beetles, Japanese Beetle, Leafhoppers, Flea Beetles: 1 lb. per 1,000 sq. ft.** For insects attacking silks and ears, apply at 2 to 3 day intervals starting when first silks appear and continuing until silks begin to dry. Three or more applications may be required depending on severity of infestation. May be applied up to 2 days before harvest.

CUCUMBER, MELONS, PUMPKIN, SQUASH: Pickleworm, Melonworm - 1/2 lb. per 1,000 sq. ft. **Cucumber Beetles, Flea Beetles, Leafhoppers, Squash Bugs** - 1/2 lb. per 1,000 sq. ft. Avoid excessive applications. Some leaf injury may occur if treatments are made when tender foliage is wet or in the presence of prolonged high humidity. Do not use this product on watermelons in Florida. May be used up to 3 days before harvest.

LETTUCE, CARROTS: Flea Beetles, Harlequin Bug, Leafhoppers - 1/2 lb. per 1,000 sq. ft. **Sixspotted Leafhopper** - 3/4 lb. in a 5 to 7 day schedule. **Armyworms, Cabbage Caterpillars, Corn Earworm, Spittlebugs, Tarnished Plant Bugs, Lygus Bugs, Stink Bugs** - 1 lb. per 1,000 sq. ft. For best results in the control of Corn Earworm after lettuce heads begin to form use 1 lb. in a 5 to 7 day schedule. May be used up to 7 days before harvest on carrots. Do not use on head or leaf lettuce within 14 days of harvest, and do not apply on carrots within 7 days of harvest.

EGGPLANT, PEPPERS: Colorado Potato Beetles, Flea Beetles - 1/2 lb. per 1,000 sq. ft. **Tomato Fruitworm, Tomato Hornworm, European Corn Borer, Lace Bugs** - 1 lb. per 1,000 sq. ft. May be applied up to 3 days before harvest.

STRAWBERRIES: Meadow Spittlebug, Strawberry Leafroller, Strawberry Weevil - 1 lb. per 1,000 sq. ft. Do not apply within 7 days of harvest.

TOMATO: Flea Beetles, Leafhoppers, Tomato Fruitworm, Fall Armyworm, Tomato Hornworm, European Corn Borer - 1 1/2 lbs. per 1,000 sq. ft. May be applied up to 3 days before harvest.

DOGS, CATS: Ticks, Fleas - Use product only outside or in a well-ventilated area. Wearing household latex or rubber gloves, dust entire animal, avoiding pet's eyes, nose, mouth and genital areas. Rub or brush pet's hair to work dust down to the skin. Apply also to the feet between the toes and on the legs. Reapply every week as necessary. **Do not use on kittens or puppies under twelve (12) weeks of age. Do not use on pregnant dogs. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals or animals on medication.**

NOTE: Do not allow treated pets back on carpet or rugs in the house as this product may stain or discolor rugs and wall-to-wall carpets. Dust lightly in and around kennels and dog houses by means of a shaker can, hand or power duster. Force dust into cracks and crevices. Repeat as necessary, but not more often than once weekly.

DO NOT USE IN THE HOME: DO NOT APPLY TO RUGS AND CARPETS, AS STAINING MAY OCCUR. Do not apply under conditions involving possible drift to food, forage or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.

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STORAGE AND DISPOSAL

STORAGE: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area.

DISPOSAL: **If empty** – Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled** – Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

