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3/19/2004



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 1 9 2004

Judith A Thompson Registration Manager Hacco, Inc. P.O. Box 7190 Madison, WI 53716

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Subject: Label Amendment: 2001-1 First Aid Prozap Carbaryl Insecticide Bait Granules EPA Reg. No. 47000-119 Submission dated August 29, 2003

Dear Ms. Thompson:

The revised labeling referenced above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, acceptable with the following comments:

1) The registration number on your label must be changed to the new number per the 2/26/04 transfer letter.

2) Revise the Precautionary Statements to say "Harmful if swallowed or inhaled. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Wash hands thoroughly with soap and water after handling. Remove clothing and wash clothing before reuse".

3)The Note to Physician should be updated to read "Carbaryl is an N-methyl carbamate insecticide which is a cholinesterase inhibitor. Specific antidote consists of atropine. Narcotics and other sedatives should not be used. Drugs like 2-PAM (pyridine-2-aldoxime methiodide) are NOT recommended.

4) The statement "Do not contaminate water, food or feed by storage and disposal" is generally placed under the Storage and Disposal heading.

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

Sincerely yours

Akiva Abramovitch, Ph.D. Chemist

PROZAP® 5% CARBARYL INSECTICIDE BAIT GRANULES

For Lawns, Ornamental Plant Beds, & Premise Insect Control Use for Outdoor Pest Control To Attract and Kill Insect Pests Listed on this Label

ACCEPTED with COMMENTS In EPA Letter Dated: MAR | 9 2004

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|---|-------------------|---|
| Carbaryl (1-naphthyl N-methylcarbamate) | | 5% |
| INERT INGREDIENTS: | | <u>95%</u> |
| ۰. ۲ | Totai | 100% |

EPA Reg. No. 61282-22

EPA Est. No. 61282-WI-1

Contains SEVIN brand Carbaryl Insecticide. SEVIN is the registered trademark of Rhone-Poulenc for carbaryl insecticides.

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

MAY BE HARMFUL IF SWALLOWED. Avoid breathing dust. Do not take internally. Avoid contact with eyes, skin, or clothing. Wear regular long-sleeved work clothing. Change to clean clothing daily. Wash hands and face before eating. Wash thoroughly after handling.

First Aid

Carbaryl is an N-Methyl Carbamate Insecticide. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

If swallowed:

- Call a poison control center, doctor or 1-800-301-7976 immediately for
 treatment advice.
- Have a 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 or convulsing person.

PROZAP[~] 5% Carbaryl Insecticide Bait Granules Page 2 of 4 August 28, 2003

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.

If in eyes:

- 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.

If inhaled:

- 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, doctor or 1-800-301-7976 immediately for treatment advice.

NOTE TO PHYSICIAN: Carbaryl is an N-methyl carbamate insecticide which is a cholinesterase inhibitor. Specific antidote consists of atropine. Narcotics and other sedatives should not be used. Drugs like 2-PAM (pyridine-2-aldoxime methiodide are **NOT** recommended.

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.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic and estuarine invertebrates and toxic to birds and other wildlife. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. 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.

STORAGE AND DISPOSAL

STORAGE: Store unused product in original container only, in cool, dry area out of reach of children and animals. Do not store in areas where temperatures frequently exceed 100°F. Do not contaminate water, food or feed by storage or disposal.

CONTAINER DISPOSAL: If empty: Do not reuse empty container. Place in trash or offer for recycling if available. If partly filled: Call local solid waste agency for the disposal instructions. Never place unused product down any indoor or outdoor drain.

Not for use on plants grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks. or on golf courses or lawns and grounds.

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LAWNS, RECREATIONAL, AND ORNAMENTAL TURF AREAS

For control of lawn and turfgrass pests, apply granules uniformly to the turf grass. For optimum control, follow specific directions for proper watering after application.

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|--|--|--|--|
| SITE | INSECT | OUNCES OF SEVIN brand 5% BAIT/1,000 SQUARE FEET | SPECIFIC DIRECTIONS |
| Lawns/ Turfgrass | Armyworms, Crickets, Cutworms, Darkling ground beetle, Grasshoppers, Mole crickets, Sowbugs | 8 to 16 | Treat entire area to obtain uniform coverage, giving particular attention to building perimeters, edges of sidewalks, and along porch and patio foundations. For best results, mow lawn, remove clippings, and thoroughly water area to be treated prior to application |
| Ornamental plants | Armyworms, Crickets, Cutworms, Darkling ground beetle, Grasshoppers, Mole crickets, Sowbugs | 8 to 16 | Apply uniformly to soil around plants, shrubs, and trees. For best results, thoroughly water area to be treated prior to application. |
| Lawns, Recreational & Omamental Turf Areas | Ants, Centipedes, Chiggers, Chinch bugs, Earwigs, Essex skipper, European chafer, Fall armyworm, Fiery Skipper, Fleas, Green June beetle, Green June beetle, Green June beetle grubs, Lawn moths (sod webworm), Leafhoppers, Lucerne moth larvae, | 44 to 60 | Treat entire area to obtain uniform coverage, giving particular attention to building perimeters, edges of sidewalks, and along porch and patio foundations. Use the lower rate before insects "build-up" and before turf is damaged. Use the higher rate when insects are numerous and turf damage is imminent. For best results mow lawn, remove clippings and apply material, then allow sprinklers to run for 15 minutes after application. Keep children and pets off treated area until grass is dry. Repeat application may be made at 30 day intervals or as needed for control of Sod Webworms, Chinch Bugs or Ants. |

| SITE | INSECT | OUNCES OF SEVIN brand 5% BAIT/1,000 SQUARE FEET | SPECIFIC DIRECTIONS |
|------|---|--|---------------------|
| | Millipedes, Spittlebugs, Springtails, Ticks, Yellow-striped armyworm | | |

LAWNS, RECREATIONAL, AND ORNAMENTAL TURF AREAS (CONT.)

FOUNDATION "INSECT BARRIER" TREATMENT FLOWER BEDS, ORNAMENTAL PLANTINGS

Apply 1 pound per 1,000 Sq. Ft. ($32' \times 32'$) to all soil areas for use as a contact and bait control of Earwigs, Cutworms, Armyworms, Crickets, Sowbugs, Millipedes, Ants; and for contact control of Fleas; around the outside of buildings, under porches and foundation crawl spaces, in and around flower and ornamental plantings, along soil cracks next to buildings, and as an insect barrier in a band 5 feet wide surrounding the foundation. For the insect "Barrier" sprinkle $\frac{1}{2}$ lb. of granules in a 5 foot wide band 100 feet in length (500 Sq. Ft.).

IMPORTED FIRE ANTS

For control of Imported Fire ants, apply two to four ounces to each mound. Immediately irrigate with a minimum of one gallon of water to flush the chemical from the granule to the inside of the mound. Do not use over two gallons of water, as flooding of the mound will result in poor control. Apply water gently to avoid disturbing ants and causing migration from the mound. For best results, apply in the early morning or late evening hours when ants are least active. Treat new mounds as they appear.

LIMITED WARRANTY AND DISCLAIMER

It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Manufacturer and Seller. In no case shall Manufacturer and Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer. Except as expressly provided herein, Manufacturer and Seller make no warranties, guarantees or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

NET WEIGHT: 2 POUNDS

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Manufactured by: HACCO, INC., P.O. Box 7190 Madison, Wisconsin 53707 U.S.A.

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