



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

PM 18 50472 1

AUG 1 1991

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

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3-1/401,274
17

Mr. William Wolf
Necessary Trading Company, Inc.
422 Salem Avenue
New Castle, VA 24127

Dear Mr. Wolf:

Subject: Revised Labeling and Confidential Statement of Formula
for **Sabadilla Pest Control**
EPA Registration No. 50932-1

The amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act are acceptable subject to the following comments.

1. Within 18 months of the date of this letter, submit the following acute toxicology studies on this end-use product described in your Confidential Statement of Formula dated 5/21/91

<u>Study</u>	<u>Guideline Reference Number</u>
a. Acute Oral Toxicity	81-1
b. Acute Dermal Toxicity	81-2
c. Primary Dermal Irritation	81-5
d. Dermal Sensitization	81-6

2. Submit a revised Confidential Statement of Formula within one month of this letter in which you provide upper and lower Certified Limits for the active ingredient, sabadilla alkaloids, and the inert ingredients in your formulation.

A stamped copy of the label is enclosed for your records. Submit five (5) copies of final printed labeling.

Sincerely,

Phil Hutton
Product Manager 18
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Sabadilla Pest Control

Thanks for choosing Necessary Organics, the same products we've been providing professional growers and groundskeepers for many years. Same ingredients. Same effectiveness. We carefully select nature's finest renewable resources so that, together we can make a difference.

Bill Wolf
Founder, President

Directions For Use: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Sabadilla is a wettable powder that can be dusted or mixed with water and sprayed onto the leaf surfaces especially the undersides where insect damage is occurring. Use only as needed. Apply at 5 to 7 day intervals and after each rain. Reenter treated area when spray dries or dust settles. Crops may be harvested 24 hours after treatment.

Sabadilla will usually control the hard-to-kill insects listed below.

CROP	INSECT
Vegetables such as brassicas, tomatoes, eggplant, cucumbers, pumpkins, lettuce, corn, mustard, peaches, potatoes, pumpkins, squash, tomatoes, and melons	Aphids, Cabbage Worms, Diamondback Moth, Flea Beetle, German Roach, Grasshoppers, Green Clover Worm, Green Measuring Worm, Green Tree Bug, Hairy Chinch Bug, Harlequin Bug, Lygus Bug, Leafhopper, Mexican Bean Beetle, Milkweed Bug, Squash Bug, Striped Cucumber Beetle, Tarnished Plant Bug
Fruits and Berries such as apples, blackberries, grapes, melons, peaches, raspberries, and strawberries	Leafhopper, Harlequin Bug, Lygus Bug, Squash Bug, Striped Cucumber Beetle, Tarnished Plant Bug
Citrus	Citrus Thrips (combine with sugar water)
Flowers, shrubs, and shade trees	Aphids, Blister Beetle, Flea Beetle, Harlequin Bug, Leafhopper, Tarnished Plant Bug
Field Crops such as alfalfa, clover, and sunflowers	Grasshoppers, Leafhoppers, Green Clover Worm, Sunflower Weevil, Tarnished Plant Bug

To Dust: Apply to plants wet with dew or moist from showers.

To Spray: Mix 5 to 8 Tablespoons of Sabadilla with each gallon of water. Pour solution through 100 mesh screen or fine filter to remove seed hulls. Mist plants evenly. Apply 5 to 8 pounds per acre usually with at least 25 gallons of water.

Statement of Practical Treatment:
IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.
IF IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention.
IF ON SKIN: Immediately remove contaminated clothing, INCLUDING SHOES, and wash skin with soap and plenty of water. If irritation develops, send for a physician.

Precautionary Statements: Hazards to humans and domestic animals.
CAUTION: HARMFUL IF SWALLOWED. Avoid breathing of dust or spray. Do not take internally. Avoid contact with eyes and skin. Wear regular, long-sleeved work clothing. Change to clean clothing daily. Wash hands and face before eating. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS: Do not apply directly to water. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of waste.

PHYSICAL OR CHEMICAL HAZARDS: Do not use, pour, spill or store near heat or open flame.
Storage and Disposal: Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

STORAGE: Do not store near heat or open flame. Store in a dry place. Sabadilla does not deteriorate with age.

CONTAINER DISPOSAL: Completely empty container by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of containers in a sanitary landfill or by incineration if allowed by state and local authorities.

WARRANTY & CONDITION OF SALE: Our recommendations 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 recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with the directions given herewith. This product sold by weight not by volume. Some settling may occur.

In no case shall Necessary Trading Company 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 directions given herewith. The foregoing is a condition of sale by Necessary Trading Company and is accepted as such by the Buyer.

SATISFACTION GUARANTEED: If you're not pleased with the results after using this product, return with proof of purchase for replacement or refund to:



© Bill Wolf
 1000 Castlewood Road
 24127-0305
 EPA Reg. #50932-1
 EPA Est. #279-NY-1

Sabadilla Pest Control

- Earth's Ancient Botanical Insect Killer
- For Hard-to-Kill Plant Bugs
- Use on Fruits, Vegetables and Flowers
- Net Wt. 8 oz.

Active Ingredients
 Sabadilla Alkaloids 8
Inert Ingredients 99.2
 Total 100

Derived from Sabadilla dry seed

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**
 See Back Panel For Additional Precautionary Statements

