



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

Kim Davis
Contract Packaging, Inc.
c/o RegWest Company
PO Box 2220
Greeley, CO 80632-2220

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: CP Snail and Slug Killer Pellets, EPA Reg. # 67572-78
label amendment submitted 6/24/98, revised 7/15/98
accepted with comments

Dear Ms. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comments:

- 1) To clarify that the product can not be used on food crops grown in greenhouses change the phrase "commercially grown ornamentals, greenhouses and container nurseries" to:

"Commercially produced ornamentals grown in fields, greenhouses, containers, and nurseries".

This phrase occurs in two locations on the label: 1) on the front panel under the product name, and 2) in the Directions for Use). Both must be revised.

Please submit three (3) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely yours,

A handwritten signature in black ink, appearing to read "TCH".

Thomas C. Harris
Insecticide / Rodenticide Branch
Registration Division (7505C)
Office of Pesticide Programs

enclosure

2084

**CP
SNAIL AND SLUG
KILLER PELLETS**

**For Commercial and Professional Use Only
Not for Residential/Homeowner Use**

**For Use in Commercially Grown Ornamentals, Greenhouses
and Container Nurseries**

- * Controls Snails and Slugs for Up To 14 Days
- * One Pound Treats 1,000 Square Feet

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
SEP 11 1998**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67572-78**

ACTIVE INGREDIENT:

Thiodicarb: Dimethyl N,N'(thiobis [(methylimino) carbonyloxy])	1.75%
INERT INGREDIENTS	<u>98.25%</u>
Total	100.00%

**Keep Out of Reach of Children
CAUTION
See back panel for precautionary statements.**

EPA Reg. No. 67572-78

EPA Est. 67572-GA-1

**Manufactured by:
Contract Packaging, Inc.
P.O. Box 1508
Covington, GA 30209**

NET CONTENTS: ___ POUNDS

PRECAUTIONARY STATEMENTS**Hazards to Humans & Domestic Animals**

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash with soap and water after handling. **IMPORTANT:** Keep away from children, dogs and pets. Bait may be attractive to dogs. Confine pets during application to prevent them from believing they are being fed. Use and store under conditions where there will not be a hazard.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves and shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Statement of Practical Treatment**Thiodicarb is an N-methyl carbamate**

If Swallowed: Do not induce vomiting unless directed to do so by a physician or poison control center. Get medical attention. **If in Eyes:** Hold eyelids open and flush with a steady, gentle stream of water for at least 15 minutes. Get medical attention. **If on Skin:** Wash with plenty of soap and water. Get medical attention if symptoms persist. **Note to Physician:** All treatments should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred. This product contains an N-methyl carbamate insecticide, which is a cholinesterase inhibitor. Overexposure to this substance may cause toxic signs and symptoms due to stimulation of the cholinergic nervous system. These effects of overexposure are spontaneously and rapidly reversible. Gastric lavage may be used if this product has been swallowed. Poisoning by this product may occur rapidly after ingestion and prompt removal of stomach contents is indicated. Specific treatment consists of parenteral atropine sulfate. Caution should be maintained to prevent over atropinization. Mild cases may be given 1 to 2 mg intramuscularly every 10 minutes until full atropinization has been achieved and repeated thereafter whenever symptoms reappear. Severe cases should be given 2 to 4 mg intravenously every 10 minutes until fully atropinized, then intramuscularly every 30 to 60 minutes as needed to maintain the effect for at least 12 hours. Dosages for children should be appropriately reduced. Complete recovery from overexposure is to be expected within 24 hours. Narcotics and other sedatives should not be used. Further, drugs like 2-PAM (pyridine-2-aidoxime methiodide) are not recommended unless organophosphate intoxication is also suggested. To aid in confirmation of a diagnosis, urine samples should be obtained within 24 hours of exposure and immediately frozen. Analysis will be arranged by Rhone-Poulenc Ag Company. Consultation on therapy can be obtained at all hours by calling the Rhone-Poulenc emergency number: 1-800-334-7677.

Environmental Hazards

This product is toxic to fish, birds, invertebrates and other wildlife. 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 contaminate water by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from area treated. This product is toxic to bees exposed to direct treatment. Do not apply when bees are actively 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.

Read Entire Label Before Using This Product**AGRICULTURAL USE RECOMMENDATIONS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains specific 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) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

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.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

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PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is: coveralls, waterproof gloves and shoes plus socks.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

COMMERCIALLY GROWN ORNAMENTALS, GREENHOUSES AND CONTAINER NURSERIES

For control of snail and slug pests, such as but not limited to, the brown garden snail and the grey field slug.

Apply one pound per 1,000 sq. ft. (43.56 pounds per acre) of product as a uniform broadcast treatment to containers or ornamental beds. Apply during peak periods of snail or slug activity, such as early morning or late evening. Repeat applications every 10 - 14 days or as necessary. Do not exceed 12 applications per year.

Storage and Disposal

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

Storage: Do not store in or around the home. Store unused product in a cool, ventilated, dry locked area. Do not allow prolonged storage in areas where temperatures frequently exceed 115°F (46°C). **Never transfer this product to another container for storage.** If container is damaged, before clean-up, put on long-sleeved shirt and long pants, waterproof gloves and shoes plus socks.

Pesticide Disposal: Contamination with this product will render water, food or feed unfit for human or animal consumption. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Never reuse empty containers. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.