



239-2134

6/27/2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUN 27 2001

Mr. Charles T. Levey
Manager, Federal Registrations
The Scotts Company
1111 Scottslawn Road
Marysville, OH 43041

Subject: Amendment -Label Revisions - Delete Use on Non-Bearing Fruit Trees
Ortho Systemic Rose and Flower Care
EPA Registration No. 239-2134
Your Submission Dated March 30, 2001

Dear Mr. Levey:

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below:

1. Revise the "Precautionary Statements" section of your label to read "May be fatal if swallowed or absorbed through skin. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, socks, waterproof footwear, and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse. Cotton gloves should be laundered or discarded and rubber gloves washed with soap and water after each day's use.

2. Revise your "First Aid" statements to read:

"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 a 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 15-20 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 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center for treatment advice.

Handwritten signature/initials

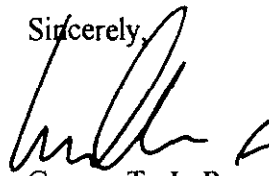
IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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-xxx-xxxx for emergency medical treatment information.”

In our letter of January 14, 2001, we acknowledged that your product is currently dormant (as per your letter of September 19, 2000) and agreed that prior to remarketing this product, you would have to comply with the requirements stated in PR Notice 9-2. Does this label amendment indicate that you intend to begin marketing this product? If so, then you must comply with PR Notice 96-2.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the label is enclosed for your records. If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

3 of 10

ORTHO® Systemic Rose & Flower Care 8-12-4, EPA Reg. No. 239-2134
[ABN: RosePride® Systemic Rose & Flower Care 8-12-4]

NOW WITH MEASURING CAP [5 LB & SIZE ONLY]
[ICON] OUTDOOR USE ONLY

MEASURING CUP INSIDE [10 LB ONLY]

- Provides Proper Amount of Plant Food
- Protects Against Insects for Six Weeks
- 2-Way Action: Fertilizes & Protects Against Insects for 6 weeks [8/11/97]
- Two-Way Action: Feeds/fertilizes and protects against insects
- Feeds/Fertilizes and protects your roses in one easy step
- Two-in-One Action
- Protects Against Insects
- Fertilizes and protects your roses against insects
- Takes seconds/minutes - lasts for weeks
- Apply in seconds/minutes - lasts for weeks
- Feeds and protects up to 12, 16/40/42/80 roses (depending on size 1, 2, 5, 5-¼, 10 lbs.)
- Treats up to 12, 16/40/42/80 roses (depending on size)
- [11/13/97] Treats 12 Rose Bushes-[1.5 lb]
- Beautiful roses have never been easier
- One step to beautiful roses
- Great results - Guaranteed
- Provides long lasting feeding and protection
- Feeds and protects 20 roses for the growing season (5 lb. size)
- One application lasts 6 weeks
- One step is all it takes to beautiful roses
- Beautiful roses made easy
- Easy to use
- Beautiful roses in one step
- [8/11/97]: For Strong Beautiful Roses, Shrubs & Flowers
- Quick and easy
- Ready-to-use, No mixing
- Feeds/Fertilizes and protects roses, flowers, and ornamental shrubs
- Water proof packaging
- All weather package
- Bonus pack
- Bonus size
- Handy measuring cup
- Use the cap as a measuring cup
- Cap doubles as a measuring cup
- Green granules
- New green granules/Colored granules/New colored granules

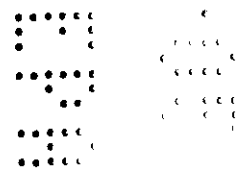
ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 27 2001

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

239-2134

Active Ingredient
 *Disulfoton.....1%
 Other Ingredients.....99%



*DI-SYSTON® Insecticide

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional precautionary statements.

- NET 2 OZ / 56.6 g
- 1.5 LB / 681 g
- 2 lb / 907 g
- 5 lb / 2.26 kg
- 10 lb/ 4.53 kg
- 12 lb/ 5.44 kg

Protects and feeds rose bushes and ornamental plants in one easy step. Two-in-one product contains an insecticide and with the primary nutrients your roses and plants/flowers need for strong growth and beautiful blooms. Feeds and protects plants against insects for up to 6 weeks. Treats your roses in minutes [seconds]. Simply apply the granules around the base of the plant, mix into the soil, and water. The product is absorbed into enters the plant through the roots and will not be washed off by rain or watering. Even new growth is fully protected from insect damage. Feeds and protects up to 40 roses [5 lb. size/1 rose - 2 oz.; 12 roses - 1.5 lbs; 40 roses - 5 lbs; 42 roses - 5 1/4 lbs; 16 roses - 2 lbs size; 80 roses - 10 lb size; 96 roses - 12 lb size [11/15/96]

8-12-4 [must be in upper 1/3 of label]

1138-1105

GUARANTEED FERTILIZER ANALYSIS

Total Nitrogen (N)	8%
5.6% Ammoniacal Nitrogen	
1.1% Urea Nitrogen	
1.3% Water Insoluble Nitrogen	
Available Phosphate (P ₂ O ₅).....	12%
Soluble Potash (K ₂ O).....	4%
Calcium (Ca)	8%
Magnesium (Mg)	3.0%
0.5% Water Soluble Mg	
Sulfur (S) as Combined.....	4.0%
Boron (B).....	0.02%
Iron (Fe)	0.4%
Manganese (Mn)	0.05%
Molybdenum (Mo).....	0.0008%
Zinc (Zn).....	0.05%

Primary Nutrients from Urea, Urea Formaldehyde, Ammonium Sulfate, Ammoniated Superphosphate, Ammonium Phosphate and & Muriate of Potash. Potential Acidity 600 lbs. Calcium Carbonate Equivalent per ton.

Secondary and Trace Nutrients from Superphosphate, Magnesium Oxide, Ammonium Sulfate, Iron Sulfate, Sodium Borate, Manganese Oxide, Sodium Molybdate and Zinc Oxide Chlorine, not more than 3.1%

Fertilizer content guaranteed by SOLARIS.

[8/20/98]

Product Facts	
KILLS	Aphids, Lacebugs, Leafhoppers, Leafminers (Birch & Holly), Mimosa
INSECTS	Webworms, Pine Tip Moths, Spider Mites & Whiteflies
&	
FERTILIZES	With the primary nutrients your plants need for strong growth & beautiful blooms.
WHERE TO USE/ AMOUNT TO USE	
	New Roses: 1/4 cup per rose bush
	Established Roses: 1/3 cup per rose bush (Treats up to XX rose bushes.)
	Shrubs: 2/3 cup per foot of shrub height
	Flowerbeds: 5 1/3 cups per 100 sq ft (5' X 20')
[phone icon] Questions, Comments or Medical Information	
	call 1-800-225-2883 www.ortho.com

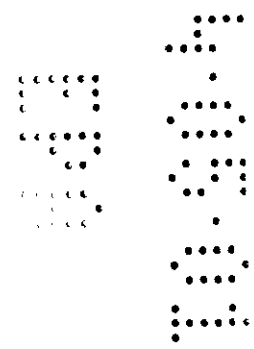
This container's cap filled to top of inner circle = 4 rounded Tablespoons (Tbs) = 1/3 cup. (5 lb size) [11/17/98]

[11/17/98] This container's cap filled to top = 4 rounded Tablespoons (Tbs) = 1/3 cup (12 lb size.)

One level measuring scoop holds 1/3 cup [10 lb. only]

Do not use cups or spoons for food after use with this product - keep for garden use only.

Specially formulated for residential use.



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.**

USE DIRECTIONS [8/11/97]

A. [2 OZ. PACKET ONLY]

FREE SAMPLE 2 OZ - 1 ROSE BUSH }

Treats one rose bush
Cut Here (scissors icon/dotted line)

Where To Use: Roses & Flower Beds

Amount To Use:

New Roses [11/13/97] or New Rose Bushes : Use 3/4 packet around base of one rose.

Established Roses [11/13/97] or Established Rose Bushes : Use entire packet around base of one rose.

Flower Beds: Use entire packet for 6 sq ft (3' X 2').

B. ALL OTHER PACKAGE SIZES ([11/13/97] 1.5, 2, 5, 10 & 12 LB SIZES)

Where to Use: Roses, Shrubs, & Flowers/& Flower Beds)

Amount To Use:

New Roses [11/13/97] or Rose Bushes: 1/4 cup per bush

Established Roses [11/13/97] or Rose Bushes: 1/3/cup per bush

Shrubs: 2/3 cup per foot of shrub height

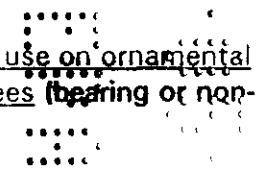
Flower Beds: 5 1/3 5-1/4 cups per 100 sq ft (5' X 20')

Kills Pests: Aphids, Lacebugs, Leafhoppers, Leafminers (Birch & Holly), Mimosa Webworms, Pine Tip Moths, Spider Mites, Whiteflies

Fertilizes: With the primary nutrients your plants need for strong growth & beautiful blooms.

HOW TO APPLY: Apply evenly around base of plant. Work into top 1 to 2 inches of soil with garden tool. Water thoroughly.

IMPORTANT: Do not mix or apply with other fertilizers. Product is for use on ornamental garden plants only. It [product] is not for use on edible plants, fruit trees (bearing or non-bearing), lawns or container grown plants.



WHEN TO APPLY: Apply [immediately] after planting, or after established plants have [about - optional word] one inch of new growth. Reapply every 6 weeks during the growing season.

HOW IT WORKS: One easy step feeds & protects plants against insects for up to 6 weeks. This product enters plants through roots and will not be washed off by rain or watering. Even new growth is fully protected from insect damage. [illustration]

[OPTIONAL TEXT #3]

INSECTS CONTROLLED

Aphids , Spider Mites, Leafminers (Birch & Holly) Birch Leafminer, Holly Leafminer, Leafhoppers, Whiteflies, Pine Tip Moth, Lace Bug, Mimosa Webworm.

WHEN TO USE

Apply in the spring when plants have about one inch of new growth. Reapply every 6 weeks during the growing season. Do not mix or apply with other fertilizers.

WHERE & HOW TO USE

Product is for use on ornamental garden plants only. It is not for use on edible plants, fruit trees (**bearing or non-bearing**), lawns, or container grown plants.

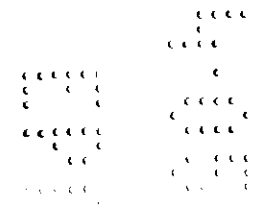
[Text Form - Option 2:]

ESTABLISHED ROSES: spread 1/3 cup (2 oz.) evenly around the base of each bush. Work into 1 or 2 inches of soil with a garden tool. Water thoroughly.

NEW ROSES: After planting, mix 1/4 cup in the top 2 inches of soil with a garden tool. Water thoroughly.

FLOWERS, FLOWER BEDS, BULBS, BEDDING PLANTS: Apply 2 lbs. (5 1/3 cups) per each 100 sq. ft. (5'x20') of bed area. Work into top 1 to 2 inches of soil. Plant seeds or transplants and water thoroughly.

ORNAMENTAL SHRUBS: Apply 2/3 cup for each foot of shrub height (2 cupfuls for a 3-foot high shrub). Spread evenly from the base to the drip line of all sides of the plant. Work into the top 1 to 2 inches of soil with a garden tool and water thoroughly.



[Table Form OPTION 1]

PLANTS	PRODUCT TO APPLY	TREATMENT TIPS
Established Roses	1/3 cup per plant. Fill measuring cap to top of inner circle (1/3 cup). [1 Level measuring scoop holds 1/3 cup].	<u>Apply</u> Spread evenly around the base of each bush/ <u>plant</u> . Work into top 1 to 2 inches of soil with a garden tool. Water thoroughly.
New Roses	¼ cup per plant	After planting, mix into top 2 inches of soil with a garden tool. Water thoroughly.
Ornamental Shrubs (illustration)-Root zone	2/3 cup for each foot of shrub height	Spread evenly from the base to the drip line of all sides of the plant. Mix into top 2 inches of soil with a garden tool. Water thoroughly.
Flowers, Bulbs, Bedding Plants	2 lbs. per 100 sq. ft. (5' x 20')	Spread over bed area before planting. Work into top 1-2 inches of soil. Plant new seeds or transplants. Water thoroughly.

[5 & 12 lb. sizes with measuring cap only]

Measuring cap filled to top of inner circle holds 1/3 cup.

Measuring cap filled to inner line holds 1/3 cup (2 oz.).

This container's cap filled to top of inner circle = 4 rounded Tablespoons (Tbs) = 1/3 cup. [8/1197].

[10 lb. size canister with measuring scoop included only]

One level measuring scoop holds 1/3 cup.

[2 lb. size canister does not include a measuring scoop]

4 ROUNDED TABLESPOONS EQUAL 1/3 cup.

Do not use cups and [9/5/97] / or spoons for food after use with this product - keep for garden use only.

Pesticide-Fertilizer mixture containing 1% DI-SYSTON Insecticide. [OPTIONAL STATEMENT]

[Reentry icon] Children may enter treated areas after product is worked and watered into the soil and treated area is completely dry. NOTE: Product may be attractive to dogs.

[Moved from precautionary statements section since advisory statement]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

WARNING: May be fatal if swallowed. Harmful if absorbed through skin. Causes substantial but temporary eye injury. Harmful if inhaled. Do not get in eyes, on skin, or on clothing. Wear goggles or safety glasses. Avoid breathing dust. Wash thoroughly with soap and/ & water after handling and/ & before eating, drinking, or using tobacco. Remove contaminated clothing and/ & wash before reuse.

FIRST AID: IF SWALLOWED: Call a physician or Poison Control Center (~~1-800-454-2333~~) [11/13/97] (1-800-225-2883). 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 ON SKIN: wash with plenty of soap and/ & water. Get medical attention. IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention. IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

Note to Physicians: Disulfoton is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine by injection is antidotal. 2-PAM is also antidotal and/ & may be administered, but only in conjunction with atropine.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and wildlife. Do not apply directly to water. Cover or incorporate spills.

STORAGE AND DISPOSAL [OPTIONAL HEADING]

STORAGE: Store in original container in a safe place. [8/11/97].

For 2 oz. unit dose sample packet only Once this packet is open, use all of the contents as directed. Do not attempt to reseal for future use.

DISPOSAL: Do not reuse empty container. Securely wrap partially filled or empty container in newspaper and/ & discard in trash.

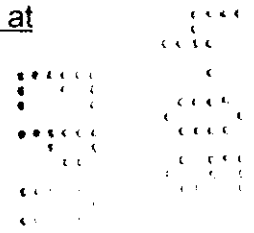
NOTICE- Buyer assumes all responsibility for safety and/ & use not in accordance with directions.

[OPTIONAL STATEMENT]

For registration of fertilizer products in the State of Washington Only.

This product has been registered with the Washington State Department of Agriculture. When applied as directed, this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product. Information received by the Washington State Department of Agriculture regarding the components in this product is available on the internet at <http://www.wa.gov/agr/>.

☛ Medical Information call 1-800-225-2883
Product Information call 1-800-225-2883



10 8 10

[11/13/97] OR

? Questions, Comments or Medical Information
Call 1-800-225-2883 www.ortho.com

ORTHO® RosePride®, SOLARIS®, Trademarks of Monsanto Company
DI-SYSTON® Trademark of Bayer AG, Leverkusen

Manufactured for
The SOLARIS Group of
Monsanto Company
P.O. Box 5008
San Ramon CA 94583-0808
Form O-221-01; 8-751-05; 8-753-04, 119-03
EPA Reg. No. 239-2134-ZA EPA Est. 34704-NB-3; 33967-NJ-1
Made in USA

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