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300/146427  
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345/139577  
17/10  
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346/146432  
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Mr. W. L. Chase  
Chevron Chemical Company  
ORTHO Agricultural Chemicals Division  
940 Hensley Street  
Richmond, CA 94804-0036

Dear Mr. Chase:

Subject: Product Chemistry & Toxicology Data  
Confirmation of Source of Ingredient  
Amendments - Revised Finished Labels;  
Alternate Formula & Declaration  
ORTHO 3-Way Rose and FlowerCare  
EPA Registration No. 239-2292  
Your submissions dated August 3 and September 11, 1984;  
February 12, 1985

The Agency has the following comments on the Product Chemistry and Toxicology data that you requested to be added to this product's file:

1. The Product Chemistry data has been assigned the following Accession Numbers:
 

Volume 1	Accession Number 254327
Volume 2	Accession Number 254328
2. The certified limits for the active ingredient are acceptable. However, you must also submit certified limits for the inert ingredients. We note the range for these materials on page 3 of volume 2. Do you intend these to be your certified limits?
3. Please submit the currently available storage stability data for this product (presumably information through six months).
4. The Toxicology data has been assigned the following Accession Numbers:
 

Volume 1	Accession Number 254325
Volume 2	Accession Number 254326
5. The acute oral toxicity study is acceptable despite the absence of certain experimental details and confidence limits exceeding 20%. This product is in Toxicity Category II by this route of exposure.
6. The acute dermal toxicity study is only supplementary data because of the lack of individual reports. Also, the product was not moistened to facilitate contact with the skin as called for in the Guidelines.