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SEP 29 1985

Mr. William Chase
Chevron Chemical Company
Ortho Consumer Products Division
940 Hensley St.
Richmond, CA 94804-0036

Dear Mr. Chase,

Subject: Revised Labeling and Response to Disulfoton
Reregistration Document
ORTHO Systemic Rose & Flower Care 8-12-4
EPA Registration Number 239-2134
Your Submissions Dated June 18, and July 19, 1985, and
August 25, 1986.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1. The request to remove potted plant use from the label is acceptable.

2. The Active Ingredient statement should read:

Disulfoton [O,O-Diethyl S-[2-(ethylthio)ethyl]phosphorodithioate]

3. Revisions to the Statement of Practical Treatment must be made. We suggest the following statement; however, if your toxicological data suggests otherwise, please submit a draft Statement of Practical Treatment for prior approval:

If Swallowed: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with a finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If In Eyes: Flush with plenty of water. Call a physician immediately.

If On Skin: Remove contaminated clothing and wash affected ~~areas~~ with soap and water.

SYMBOL							
SURNAME	THL						
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(cont.)

If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.

Note to Physician:

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

4. Revise the Environmental Hazards section to read:

This pesticide is toxic to fish and wildlife. Do not apply directly to water. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spills.

This pesticide is toxic to bees exposed to direct application. Application should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

In regard to the Discussion Sheet (259026) submitted, please note that a decision concerning the "Restricted Use" classification of this product will be made during Phase 5 of the reregistration of products containing disulfoton.

Submit five copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

Systemic Insecticide is Absorbed into the Plant Through the Root System and Then Moves Internally Through the Sap Stream

Two-Way Action

- 1. Feeds Plants**
- 2. Provides 6 Week All Weather Protection Against Listed Insects**

GUARANTEED FERTILIZER ANALYSIS

Total Nitrogen (N)	8%
5.6% Ammoniacal Nitrogen	
1.1% Urea Nitrogen	
1.3% Water Insoluble Nitrogen	
Available Phosphoric Acid (P ₂ O ₅)	12%
Soluble Potash (K ₂ O)	4%
Calcium (Ca)	8.0%
Magnesium (Mg)	3.6%
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)	0.0005%
Zinc (Zn)	0.05%

Primary Nutrients from Urea, Urea Formaldehyde, Ammonium Sulfate, Ammoniated Superphosphate, Ammonium Phosphate and Murate of Potash

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 31%
Potential Acidity 800 lbs. Calcium Carbonate Equivalent per ton 84-1030

INGREDIENT STATEMENT AS AN INSECTICIDE

Active Ingredient	By Wt
1,0,0-diethyl S-[2-(ethylthio) ethyl] phosphorothioate	1%
Inert Ingredients	99%
*Equivalent 20 lbs. DI-SYSTON Insecticide per ton DI-SYSTON®—Reg TM of Farbenfabriken Bayer A.G., Chemagro Corp. licensee	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

WARNING: May be fatal if swallowed. May be absorbed through the skin. Do not breathe dust. Do not get in eyes, on skin or on clothing. Wear rubber gloves when handling. Remove contaminated clothing and wash before use. Wash thoroughly after handling or before smoking or eating. Keep children and pets away from treated area until product is worked and watered into the soil and treated area is completely dry. Food utensils such as a teaspoon or measuring cup should not be used for food purposes after use with this material.

STATEMENT OF PRACTICAL TREATMENT

If swallowed give a large amount of water to drink, make person vomit and call a doctor. In case of eye contact, wash eyes immediately with fresh water for 15 minutes. See a doctor if irritation persists. If this is not possible, telephone a physician, or emergency hospital, or Poison Control Center for medical advice. If on skin, wash skin with soap and water. If inhaled move to fresh air. Note to Physicians: Emergency information—call (415) 233-3737. This product contains a cholinesterase inhibitor. If signs of cholinesterase inhibition appear, atropine is antidotal. 2-PAM may also be used in conjunction with atropine but should not be used alone.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Birds feeding on treated areas may be killed. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

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.**

ORTHO Systemic Rose & Flower Care 8-12-4 is an effective systemic insecticide combined with a fertilizer containing the three essential plant food elements, Nitrogen, Phosphate and Potash. This combination provides the proper amount of plant food and systemic insecticide necessary to maintain strong, vigorous plants which are free from the damage normally caused by sucking insects (aphids, leafhoppers, spider mites) and certain chewing insects.

Systemic means that the insecticide is actually absorbed into the plant through the root system and then moves internally through the sap stream into the branches, leaves, blossoms and new growth.

ORTHO Systemic Rose & Flower Care 8-12-4 protects against insects for six weeks. It cannot be washed off by rain or sprinkling, since the protection is internal. This unique action protects all surface areas, including undersides of leaves and blossoms. Even new growth is fully protected from insect damage.

ORTHO Systemic Rose & Flower Care 8-12-4, when used as directed, kills the following insects on roses and other flowers and shrubs: Aphids (Plant Lice), Spider Mites, Birch Leafminer, Holly Leafminer, Leafhoppers, Whiteflies, Pine Tip Moth, Lace Bug, Mummy Webworm.

Do not use around fruit trees or vegetable plants. Do not broadcast applications to lawns.

WHEN TO USE

ORTHO Systemic Rose & Flower Care 8-12-4 should be applied when plants have about one inch of new growth in the spring and at six-week intervals through the summer. In addition to control of insects for six weeks, your plants will be provided with the proper amount of plant food necessary to maintain strong, vigorous growth.

HOW TO USE

ON ESTABLISHED ROSES

For established plants, spread 1/2 cup (2 oz.) evenly around the base of each plant and work into 1 to 2 inches of soil. Water thoroughly. Avoid contact with hands.

WHEN PLANTING NEW BUSHES

After planting, mix 1/4 cup in the top 2" of soil. Water thoroughly. Do not apply additional fertilizer for about six weeks.

ON FLOWERS, BULBS, BEDDING PLANTS

Apply 2 lbs. per each 100 sq. ft. (5' x 20') of bed area. Work into top 1 to 2 inches of soil. Plant seed or set plants and water thoroughly. Do not apply additional fertilizer for about 6 weeks.

ON POTTED PLANTS

Apply one level teaspoonful per six-inch pot by punching a number of small holes into the soil. Pour granules into the holes and thoroughly water the plants.

ON ORNAMENTAL SHRUBS

Apply 3/4 cupful (6 oz.) for each foot of shrub height (2 cupfuls for a 3-foot high shrub). Distribute the required amount evenly from the base to the drip line of all sides of the plant. Work into the top 1 to 2 inches of soil and water thoroughly.

4 ROUND TABLESPOONS EQUAL 1/3 cup.

PESTICIDE-FERTILIZER MIXTURE containing 1% DI-SYSTON Insecticide.

STORAGE AND DISPOSAL

STORAGE: Keep pesticide in original container. Do not put into food or drink containers. Avoid contamination of food and foodstuffs. Store in a cool, dry place, preferably in a locked storage area.

DISPOSAL: PESTICIDE—Partially filled container may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash. **CONTAINER**—Do not reuse empty container. Discard container in trash.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

NOTE: THIS PACKAGE IS FILLED TO PROPER WEIGHT, BUT VARIATION IN PRODUCT DENSITY MAY CAUSE VARYING FILL LEVELS IN CAN.

TO OPEN—LIFT OUT MEASURING CUP WITH SCREW-DRIVER—REPLACE CUP FIRMLY AFTER USE.



CONFIDENTIAL

PROPERTY OF

CHEVRON CHEMICAL COMPANY

UNTIL ACCEPTED BY EPA

Plan With Six



ACCEPTED with COMMENTS in EPA Letter Dated

SEP 29 1962



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Ortho Consumer Products Division
San Francisco CA 94120-7144 Richmond CA 94804-8838
Form 9488-1 Product 2088 Made in U.S.A.
EPA Reg. No. 228-7234-ZA EPA Est. 228-1A-1

Under the Federal Insecticide, and Fungicide Act, and Executive Order 12566, this pesticide is registered under EPA Reg. No. 228-7234-ZA

729.2134

Is Absorbed into
Root System and Then Moves
Up Sap Stream

All Weather Protection
Insects

NOTE: THIS PACKAGE IS FILLED TO PROPER WEIGHT, BUT VARIATION IN PRODUCT DENSITY MAY CAUSE VARYING FILL LEVELS IN CAN.

TO OPEN—LIFT OUT MEASURING CUP WITH SCREW-DRIVER—REPLACE CUP FIRMLY AFTER USE.



ORTHO

Systemic Rose & Flower Care 8-12-4

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CHEVRON CHEMICAL COMPANY

UNTIL ACCEPTED BY EPA

2.0%
3.0%
4.0%
0.02%
0.4%
0.05%
0.0000%
0.05%
Formaldehyde, Ammonium Sulfate,
Ammonium Phosphate and Monate
from Superphosphate, Magnesium
Sulfate, Sodium Borate, Manganese
Zinc Oxide
Phosphate Equivalent per ton

INSECTICIDE

Diethyl phosphorodithioate
Insecticide per ton. DI-SYSTON®—Reg. TM of Farbentfabriken
Ludwig

By Wt
1%
99%

Plant Food
With Systemic Insecticide
Six Week Systemic Action

PRECAUTIONARY STATEMENTS

FOR HUMANS:
Avoided. May be absorbed through the skin. Do not breathe dust. Do not get in eyes, on face when handling. Remove contaminated clothing and wash before use. Wash thoroughly after use. Keep children and pets away from treated areas until product is worked and watered. Let dry. Food utensils such as a teaspoon or measuring cup should not be used for food.

FOR ANIMALS:
Do not drink, make person vomit and call a doctor. In case of eye contact, wash eyes immediately. See a doctor if irritation persists. If this is not possible, telephone a physician, or emergency medical advice. If on skin, wash skin with soap and water. If inhaled move to fresh air immediately—call (415) 233-3737. This product contains a cholinesterase inhibitor. If signs of poisoning are antidotal. 2-PAM may also be used in conjunction with atropine but should not be used if signs are severe.

FOR THE ENVIRONMENT:
Product is toxic to fish and wildlife. Birds feeding on treated areas may be killed. Do not apply to water by cleaning of equipment or disposal of wastes.

Use product in a manner inconsistent with its labeling.
IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

8-12-4 is an effective systemic insecticide combined with a fertilizer containing the three main, Phosphate and Potash. This combination provides the proper amount of plant food and certain strong, vigorous plants which are free from the damage normally caused by sucking insects and certain chewing insects.

8-12-4 is actually absorbed into the plant through the root system and then moves internally through stems, blossoms and new growth.

8-12-4 protects against insects for six weeks. It cannot be washed off by rain or sprinkling. Systemic action protects all surface areas, including undersides of leaves and blossoms. Even fact damage.

8-12-4, when used as directed, kills the following insects on roses and other flowers and shrubs: Birch Leafminer, Holly Leafminer, Leafhoppers, Whiteflies, Pine Tip Moth, Lace Bug, and other insects.

Do not broadcast applications to lawns.

8-12-4 should be applied when plants have about one inch of new growth in the spring and later. In addition to control of insects for six weeks, your plants will be provided with the proper amount of plant food for strong, vigorous growth.

2 oz. evenly around the base of each plant and work into 1 to 2 inches of soil. Water thoroughly.

Water thoroughly. Do not apply additional fertilizer for about six weeks.

ITS
of bed area. Work into top 1 to 2 inches of soil. Plant seed or set plants and water thoroughly but 6 weeks.

It can be applied by pushing a number of small holes into the soil. Pour granules into the holes and

shrub height (2 cups for a 3-foot high shrub). Distribute the required amount evenly from the plant. Work into the top 1 to 2 inches of soil and water thoroughly. Do not use 8-12-4 insecticide.

Warning: Do not put into food or drink containers. Avoid contamination of food and foodstuffs in a kitchen storage area. Container may be disposed of by securely wrapping original container in several layers of newspaper—Do not reuse empty container. Discard container in trash.

For safety and use

Property © 1961
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S.A.
S-1A-1



ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 29 1962

Keep the Federal Insecticide, Fungicide, and Rodenticide Act in mind, for the pesticide registered under EPA Reg. No.

INGREDIENT STATEMENT AS AN INSECTICIDE
Active Ingredient
"O,O-diethyl S-(2-(ethylthio) ethyl) phosphorodithioate
Inert Ingredients
"DI-SYSTON® Insecticide

Keep out of reach of children.

WARNING

See back panel for additional precautionary statements.

NET WT. 2 LBS.

789-2134