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239-2595

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MAY 28 1997



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D C 20460

8518916

OFFICE OF  
PREVENTION PESTICIDES AND  
TOXIC SUBSTANCES

Mr Frank Kaminski  
Registration Specialist  
The Solaris Group, A Division of the  
Agricultural Group of Monsanto Company  
P O Box 5006  
San Roman, CA 94583

Dear Mr Kaminski

Subject Ortho Isotox Insect Killer Formula IV  
EPA Reg No 239-2595  
Application Dated April 9, 1996,  
Resubmitted February 24, 1997

This is in reference to your subject application transmitting a revised basic Confidential Statement of Formula (CSF) and revised labeling. The labeling revisions include the reentry restrictions imposed in the Registration Eligibility Document (RED) issued for fenbutatin-oxide, one of the two active ingredients present in the subject product and a proposed homeowner exclusionary statement.

This letter addresses the proposed amendments only as a registration action, not a reregistration action.

The labeling amendment reflecting the reentry restrictions imposed in the RED referenced above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you

Submit one copy of your final printed label incorporating the following corrections before you release the product for shipment:

1. The proposed additional statement, "Specially Formulated for Residential Use" does not suffice as a WPS exclusionary statement since it does not serve the purpose of restricting use of the product for residential use only.

Please refer to PR Notice 93-11 for guidance on acceptable WPS exclusionary statements and for the correct placement of such statements, i.e. on the front panel in association with the product name or near the beginning of the Directions for Use section. The WPS exclusionary statement specified in the Notice

for products intended for non-WPS use on ornamental plants would be adequate to clarify the intended use of the product; i.e. "Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes."

2. The required human precautionary statements cited below must be grouped together on the label itself rather than in the attached booklet. Only a portion of these statements appear on the submitted label; the attached booklet is referenced for the rest of them.

"PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER: Causes irreversible eye damage and skin irritation. May be harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. Wear goggles. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse."

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended label constitutes acceptance of this condition.

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

The CSF, which was revised to reflect the nominal concentrations of the two active ingredients, is acceptable provided the discrepancy described below is satisfactorily resolved.

The product named in your cover letter as the source of the acephate used in the formulation differs from the product listed on the submitted CSF as your source of acephate. Moreover, our computer files show no record of the product named in the cover letter.

Sincerely,

*MAM*

Marilyn A. Mautz  
Biologist  
Product Manager Team 14  
Insecticide-Rodenticide Branch (7504C)

CC: E. Setren (SRRD)  
M. Eytan (IAB)

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**[[ICON] OUTDOOR USE ONLY**

**ORTHO® ISOTOX® Insect Killer Formula IV**

Makes up to 32 Gallons Spray {Quart size}

CONTROLS Aphids, Mites, Thrips, Mealybugs, Whiteflies, Scales and many other listed pests on Roses, Flowers, Ornamentals, Shrubs, and Trees.

ALSO CONTROLS JAPANESE BEETLES

CONTAINS ORTHENE® SYSTEMIC INSECTICIDE AND VENDEX® MITICIDE

KEEP OUT OF REACH OF CHILDREN

DANGER

See back panel booklet for additional precautionary statements

**Active Ingredients**

Acephate (O,S-Dimethyl acetylphosphoramidothioate).....	8.0%
Hexakis (2-Methyl-2-phenylpropyl)-distannoxane.....	0.5%
Inert Ingredients.....	91.5%

NET CONTENTS 32 FL OZ (1 QT) 946 mL  
16 FL OZ (1 PT) 473 mL

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

MAY 28 1997

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended for the pesticide  
registered under EPA Reg. No.  
239-2595

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*[The following copy is for fix-a-form booklet type labels which consumers can open, read, and reseal easily at retail as well as at time of use]*

CONTROLS Aphids, Mites, Thrips, Mealybugs, Whiteflies, Scales and many other listed pests on Roses, Flowers, Ornamentals, Shrubs, and Trees. Also controls Japanese beetles.

Do not apply to plants to be used for food or feed.

Peel open for use directions and further information.

DANGER: Causes irreversible eye damage and skin irritation. May be harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. SEE ADDITIONAL PRECAUTIONARY STATEMENTS AND DIRECTIONS INSIDE BOOKLET

PULL HERE TO OPEN LABEL PRESS TO RESEAL

Medical Information call 1-800-454-2333  
Product Information call 1-800-225-2883

ORTHO®, ISOTOX®, ORTHENE® Trademarks of Monsanto Company  
DACONIL 2787® Trademark of Fermenta Plant Protection Co. for Chlorothalonil Fungicide.  
VENDEX® Trademark of E.I. du Pont de Nemours & Co.  
FUNGINEX® Trademark of American Cyanamid Company

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Manufactured for  
The **SOLARIS** Group of  
Monsanto Company  
P.O. Box 5008  
San Ramon CA 94583-0808  
Form ~~RS717-A850~~  
Product 5616  
EPA Reg. No. 239-2595  
EPA Est. 239-1A-3<sup>1</sup>, 58996-MO-1<sup>A</sup>  
Superscript is first letter of lot number  
Made in USA

**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.**

**How to use:** Mix and spray entire plant, covering upper and lower leaf surfaces. May be applied with an ORTHO hose-end sprayer, or tank-type sprayer. Make new dilution for each use. This product is for outdoor use only by home gardeners. It has not been tested on rare, unusual varieties; therefore, when these plants are present, it is advisable to test on a few plants before spraying large numbers. Do not apply to plants to be used for food or feed. Note: Do not apply to American Elm, Flowering Crabapple, Sugar Maple, Red Maple, Redbud, Begonia and Weigelia as foliage injury may occur.

**Rate to apply-Aphids and Grasshoppers on Roses, Flowers, Ornamentals, Shrubs and Trees:** Apply 2 Tbs (1 fl oz) to 1 gal water. Spray as aphids appear. Repeat if reinfestation occurs.

**Honeysuckle Aphid (Honeysuckle):** Spray foliage as leaves begin spring expansion. Reapply 2 weeks later with a third spray 4 weeks later.

**Japanese Beetle on Roses, Linden and Boston Ivy:** Apply 4 Tbs (2 fl oz) in 1 gal water. Begin spraying when beetles or their damage first appear and repeat at 7 to 10 day intervals for as long as needed.

**All Other Listed Pests on Roses, Flowers, Ornamentals, Shrubs and Trees:** Apply 3 Tbs (1 1/2 fl oz) to 1 gal water. Spray when insects or mites are present or feeding damage is first noticed. Repeat if reinfestation occurs. For Mealybugs, Flower Thrips, Whiteflies, Mites, Scales and other hard-to-control pests, spray 2 to 3 times about 7 to 10 days apart. For best results, apply at first sign of infestation, before population becomes large.

**CONTROLS:** Aphids, Ash Plant Bug, Bagworm, Beet Armyworm, Birch Leafminer, \*Black Vine Weevil, Budworms, Cabbage Looper, Catalpa Sphinx Moth (larvae), Cottonwood Leaf Beetle, Cuban Laurel Thrips, Elm Leaf Beetle, Fall Cankerworm, Fall Webworm, Fuchsia Mite, Grasshoppers, Gypsy Moth (larvae), Holly Leafminer, Lacebugs, Leafrollers, Leafhoppers, Lilac Leafminer, Maple Shoot Moth (larvae), Mimosa Webworm, Mealybugs, Nantucket Pine Tip Moth (larvae), Oak Webworm, \*Obscure Root Weevil, Orangestriped Oakworm, Poplar Tentmaker, Psyllids, Saddled Prominent Caterpillar, Sawflies (Dusky Birch, Blackheaded Ash, Redheaded Pine and European Pine), Scales (crawlers), Spittlebugs, Spruce Mite, Stinkbugs, Thrips, Tent Caterpillars, Twospotted Spider Mite, Whiteflies, Willow Leaf Beetle.

**\*SPECIAL DIRECTIONS: BLACK VINE WEEVIL-** Spray foliage and soil beneath plants. Begin applications in mid-June and make 3 additional applications at 3

week intervals. OBSCURE ROOT WEEVIL-Spray foliage in late spring as soon as feeding is noticed (usually about May). Repeat every 4 weeks through September. COMBINATION SPRAY WITH FUNGICIDE ON ROSES: This product may be used together with ORTHO® FUNGINEX® Rose Disease control, or ORTHO Multi-Purpose Fungicide DACONIL 2787® at the rates recommended on each product label. Apply fungicide on a regular schedule to control disease and add this product only when insect control is desired. Do not apply more than three consecutive applications in combination with any of the above fungicides.

STORAGE AND DISPOSAL

STORAGE: Store away from heat or open flame. Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area. Do not store diluted spray.

DISPOSAL: PRODUCT-Partially filled bottle may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash.

CONTAINER-Do not reuse empty bottle. Rinse thoroughly before discarding in trash.

PRECAUTIONARY STATEMENTS

HAZARDOUS TO HUMANS & DOMESTIC ANIMALS

DANGER: Causes irreversible eye damage and skin irritation. May be harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear goggles. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. FIRST AID: If in eyes: hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. See a physician immediately. If on skin: wash with plenty of water. Get medical attention. If swallowed: Do not induce vomiting. Call a physician or Poison Control Center. Drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol. When handling this product, wear chemical resistant gloves, long pants, and long sleeved shirt. When using outdoors, spray with the wind to your back and do not use when wind speeds are 10 mph or more. Wash the outside of the gloves with soap and water before removing. [Child / Pet Icon]

~~Do not allow children or pets to come into contact with treated surfaces until sprays have dried. Do not allow persons or pets to enter the treated area until sprays have dried.~~

Note to Physicians: Probable mucosal damage may contraindicate the use of gastric lavage. Emergency Information call 1-800-454-2333.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to ~~birds, mammals, fish and aquatic invertebrates.~~ fish and birds. ~~Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.~~ Do not apply directly to water. ~~Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes when disposing of equipment washwater or rinsate.~~ Cover or soil-in-corporate soils.

**BEST AVAILABLE COPY**

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This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting treatment area.

PHYSICAL OR CHEMICAL HAZARDS: Flammable. Keep away from heat and open flame.

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

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Manufactured for  
The SOLARIS Group of  
Monsanto Company  
P.O. Box 5008  
San Ramon CA 94583-0808  
Form ~~RS717-A850~~  
Product 5616  
EPA Reg. No. 239-2595  
EPA Est. 239-IA-3<sup>1</sup>, 58996-MO-1<sup>A</sup>  
Superscript is first letter of lot number  
Made in USA