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CERTIFIED MAIL

SureCo, Inc. 10008 N. Dale Mabry Hwy., Suite 121 Tampa, FL 33618

Attention: Mr. Stacy A. Schmidt

Subject: Pratt Rose & Floral Bomb

EPA Registration No. 769-845 Your letter of June 13, 1997 Our letter of May 20, 1997 36/1 5-526115

In our May letter, we provided you with information on revising your Confidential Statement of Formula (CSF) and labeling.

I. Revised CSF

In your June 13, 1997 letter, you indicated that a revised CSF would follow under separate cover. Five months later, we have not received this document. Within 30 days of receipt of this letter, submit a revised CSF, including a valid source of active ingredient.

II. Revised Label

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, that:

- A. you submit one (1) copy of the final printed labeling to us before you ship the product, with the following changes:
 - 1. Delete "CONTAINS Pyrethrum & Rotenone Two Naturally Occurring Insecticides" because they would be considered to be false and misleading under 40 CFR 156.10(a)(5)(ix) & (x). As an alternative, you could put separate footnotes after each active ingredient in the ingredient statement. Acceptable wording for such footnotes could be:
 - a. Rotenone, an active ingredient derived from the derris root.
 - b. Pyrethrins, active ingredients derived from the Chrysanthemum flower.

If these conditions 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 this condition.

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

Sincerely,

Daniel B. Peacock, Biologist

Insecticide-Rodenticide Branch Registration Division (7504C)

cc: Diane Isbell (7508W)

Peacock: WP14: A:\Rotenonc\769-845.Nov:305-5407:11/14/97

FRONT PANEL

PRATT ROSE & FLORAL BOMB

FOR: Roses, African Violets, Azaleas, Dogwood, Zinnias and other ornamentals (as noted on side panel)

CONTAINS Pyrethrum & Rotenone Two Naturally Occurring Insecticides

Active Ingredients:	
Rotenone	0.008%
Other Associated Resins	0.016%
Pyrethrins	0.056%
Inert Ingredients:	
	100 000%

EPA Reg. No. 769-845 EPA Est. No. 769-GA-1

KEEP OUT OF REACH OF CHILDREN CAUTION

See Left Panel for additional precautionary statements

Manufactured by: SureCo, Inc. Fort Valley, GA 31030

Net Weight:	
CONTENTS	UNDER CRESSURE

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LEFT PANEL

PRECAUTIONARY STATEMENTS Hazards To Humans and Domestic Animals CAUTION

May be harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with skin, eyes, or clothing. Avoid inhalation of spray. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash thoroughly before reuse.

FIRST AID

If Swallowed: Drink 1 or two glasses of water and induce vomiting by touching the back of throat with finger. Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove victim to fresh air. Apply artificial respiration, preferably mouth-to-mouth, if indicated.

If In Eyes: Flush with plenty of water. Get medical attention.

If On Skin: Remove contaminated clothing. Wash skin with soap and water. Launder clothes before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to water. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate. Exposure to temperatures above 130° F may cause bursting.

RIGHT PANEL

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

HOME ORNAMENTAL GARDENS

Use Restrictions: For use on ornamentals listed below. For Home Ornamental Gardens Only.

Sites of Application and Pests to be Controlled:

ORNAMENTALS

SITES: African Violets, Asters, Azaleas, Begonias, Camellias, Carnations, Chrysanthemum, Dahlias, Delphiniums, Dogwood, English Ivy, Euonymus, Fuchsla, Geraniums, Crassula, Kentia Palm, Laurel, Marigold, Rhododendrons, Roses, Rubber Plants, Snapdragons, Stocks, Wandering Jew and Zinnias.

PESTS: Fleahoppers, certain Aphids, Spotted mites, Tarnished plant bugs, White flies when sprayed directly on the insects. Kills chewing insects such as Imported cabbage worm, Flea beetle, Rose slug, Rose chafer, Aster beetle.

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Application Directions:

- 1. Spray in evening or on cloudy day when air is still and insects first appear.
- 2. Shake gently before using.
- 3. Remove protective cap. Hold can upright, and point nozzle away from you.
- 4. Press button to spray.
- 5. Spray plants from a distance of 10 to 12 inches, spraying in short 1 or 2 second bursts.
- 6. Repeat treatment when insects reappear.

STORAGE AND DISPOSAL

Storage: Store only in a cool, dry place inaccessible to children and pets.
Disposal: When empty, replace cap, securely wrap in newspaper, and discard in trash. Do not incinerate or puncture.

IMPORTANT: Read these entire Directions and Conditions of Sale: before using this product. DISCLAIMER: SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.

NOTICE: Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.