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656/182750

Ms. Judith S. Lederer Koos, Inc. 4500 13th Court Kenosha, WI 53141

Dear Ms. Lederer:

Subject: Amendment - Reregistration of Products Containing

Disulfoton

Holiday Systemic 2 in 1 Rose Care EPA Registration No. 2491-269

Your Application Dated September 24, 1986

The amendment 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 indicated below prior to release for shipment of product bearing the amended labeling.

- 1. The common name "Disulfoton" should precede the chemical name in the ingredients statements.
- 2. Add the following to the statement of practical treatment:

Note to Physician: 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.

- 3. In the If Swallowed statement the sentence should read "and induce vomiting by touching back of throat with a finger."
- 4. Update the Environmental Hazards statement by changing "by cleaning of equipment or disposal of wastes" to "when disposing of equipment washwaters."

The following chemistry information is needed:

a) The product is slightly underformulated with regard to DiSyston concentration. The lower limit would yield .986% concentration. The lower limit must not fall below the label claim, therefore, you must use at least 30 lbs. of concentrate in a 2,000lb. batch. Please submit a corrected Confidential Statement of Formula (CSF).

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b) The limits of the active ingredient rather than the concentrate must be certified.

In the Agency letter dated June 23, 1986, we requested submission of a "Certification with Respect to Citation of Data and Formulator's Exemption Statements." To date, we have not received this information. Enclosed are the appropriate forms. Please complete and return.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,

George T. LaRocca Product Manager 15 Insecticide-Rodenticide Branch Registration Division (H7505C) READY - TO - USE

HOLIDAY

SYSTEMIC

2 IN 1 ROSE CARE

8-8-8 Rose Food with Systemic Insecticide

Active Ingredient: (as related to insecticide)	by Wt.
phosphorodithioate Inert Ingredients: Total	1.00% 99.00% 100.00%
10.01	20010

EPA Est. No. 2491-WI-1 EPA Reg. No. 2491-269

Keep out of reach of children WARNING
See rear panel for Statement of Practical Treatment and other precautionary statements

Manufactured by:

KOOS, INC. 4500 Thirteenth Ct., Kenosha, WI 3140

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STATEMENT OF PRACTICAL TREATMENT

If swallowed--Call a physican or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting. Do Not induce vomiting or give anything by mouth to an unconscious person.

If inhaled--Remove victim to fresh air. Apply artifical respiration if indicated.

If on skin--Remove contaminated clothing and wash affected areaswith soap and water.

If in eyes--Flush eyes with plenty of water. Call a physician if irritation persists.

Note to ician

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if swallowed. May be absorbed through the skin. Do not get on skin, in eyes, or on clothing. Wear rubber gloves. Do not breathe dust. Poisoning may occur as a result of exposure. Do not contaminate feed or food. Food utensils such as teaspoons and measuring cups should not be used for food purposes after use with pesticides. Do not use around fruit trees or vegetable plants. Keep children and pets away from treated areas until product is worked and watered into the soil and treated areas are completely dry. Do not broadcast application to lawn. Wash hands thoroughly after handling. This product contains an organic phosphate which is cholinesterase inhibitor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Birds feeding on treated areas may be killed. Keep out of any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes. This product is toxic to pollinating bees and should not be applied when bees are actively visiting the area.

GENERAL DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Please use this product strictly in accordance with label warnings and cautions. Read carefully before use. Avoid contact of this material with hands, wear rubber gloves.

Holiday 2 in 1 Rose Care	• • •
8-8-8 Plant Food	
Guaranteed Analysis:	
Total Nitrogen(N)	8%
0.0% Ammonical Mitrogen	•
2.0% Water Insoluble Nitrogen	_
Available Phosphoric Acid (P.O.)	8%
Soluble Potash (K ₂ O)	8%
rramary flame food Derlved from: Anhydrous Ammonia	•
reinynene Ureas, Ammonium Sulfate. Phosphoric Acid	, .
and Muriate of Potash.	

HOLIDAY Systemic 2 in 1 Rose Care is a scientifically prepared plant food especially formulated for rose feeding combined with a highly effective systemic insecticide. When applied according to directions, HOLIDAY Systemic 2 in 1 Ruse Care will provide the proper amount of plant food and systemic insecticide necessary to maintain strong, healthy roses which are free from the damage normally caused by sucking insects (aphids, leafhoppers, spider mites, and thrips) and certain chewing insects. The insecticide in HOLIDAY Systemic 2 in 1 Rose Care in taken up by the roots and moves in the sap stream to all parts of the plant (systemic action)--even into the new growth. Here it stays on guard to kill insects as they feed on the plant. HOLIDAY Systemic 2 in 1 Rose Care when used as directed kills Aphids (plant lice), Birch leaf miner, Holly leaf miner, Lace bug, Leafhoppers, Mimose webworm, Pine tip moth, Spider mites, Thrips, Whiteflies on roses and other shrubs and flowers.

In addition to control of insects for 6 weeks, 2 in 1 Rose Care provides your roses with the proper amount of plant food necessary to maintain strong healthy plants.

HOW TO USE HOLIDAY 2 IN 1 ROSE CARE On Established Roses: Spread 2 oz. of HOLIDAY 2 in 1 Rose Care evenly around the base of each plant and work into 1 to 2 inches of soil. Water thoroughly. When Planting New Bushes: Place 1 oz. in the *ransplant hole with the soil as you fill. Mix 1 oz. in the top 2 inches of soil. Water thoroughly. Do not apply additional fertilizer for about 6 weeks. On Flowers, Bulbs, and Bedding Plants: Apply 2 pounds of HOLIDAY 2 in 1 Rose Care per each 100 square feet (5 x 20 feet) of bed area. Work into top 1 to 2 inches of soil and water thoroughly. On Ornamental Shrubs: Apply 4 oz. of HOLIDAY 2 in 1 Rose Care for each foot of shrub height (12 oz. for a 3-foot high shrub). Distribute the required amount evenly from the base to the drip line on all sides of the plant. Work into the top 1 to 2 inches of soil and water thoroughly.

WHEN TO USE HOLIDAY 2 IN 1 ROSE CARE

Apply when plants have about 1 inch of new growth in the spring and at 6 week intervals through the summer, 2 in 1 Rose Care will provide the proper amount of plant nutrients to maintain strong healthy plants. Each application will give at least 6 weeks control of the pests listed.

KOOS, INC. 4500 Thirteenth Ct., Kenosha, WI 5314

