

Reg # 3125-152

PM-13

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SEP 23 1987

Mr. Terry MacNamara
Mobay Chemical Corporation
Hawthorn Road
P.O. Box 4913
Kansas City, MO 64120

Dear Mr. MacNamara:

Subject: Amendment - Disulfoton Registration Standard/Name Change/
Formula Change
Old Name: Systemic 2 In 1 Rose Care 8-8-8 Rose Food
New Name: Systemic 2 In 1 Rose Care 10-10-10 Rose Food
EPA Registration No. 3125-152
Your Applications Dated July 25, 1985 and June 5, 1986

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. On the front panel add the commonly accepted name "Disulfoton." It should precede the chemical name under the active ingredients section as follows:

Disulfoton: O,O-Diethyl-S- . . .
 - b. The Storage and Disposal section should be located immediately before or at the end of the Directions For Use section. We also suggest that this section be blocked with a solid line in order to make it more prominent.
3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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16125:I/C:LaRocca:LR-1;KENCO:9/22/87;10/1/87;lf:dg:lf

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

4. With respect to the product chemistry and Confidential Statement of Formula, we have the following comments.
 - a. The upper certified limit for your active ingredients indicates a 30% overformulation above label claims. This is not acceptable and must be changed.
 - b. We note that the storage stability study on this product (10-10-10) was initiated in June 1986. Please submit these data for our review.

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 these conditions.

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

The acute toxicological data that you have submitted in support of this product are still under review. Once these reviews are completed, additional label changes may be necessary if data warrant restricted-use classification.

Should you have any questions please feel free to call Doug Stephenson at (703) 557-4420 or call me.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

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BLD17

Base Reg. (\$909)

U.S. LABEL-(S)

Reason to Issue: To show new
fertilizer analysis; to revise
Corporate name.

Date of Draft: 6/5/86 (S)
Supersedes Draft Dated: 7/16/85

EPA Reg. No. 3125-152

SYSTEMIC

2 in 1 ROSE CARE
10-10-10 ROSE FOOD

WITH

SYSTEMIC
INSECTICIDE

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 23 1987

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

3125-152

ACTIVE INGREDIENT: (As related to insecticide content)
O,O-Diethyl S-[2-(ethylthio)ethyl]
phosphorodithioate 1%

INERT INGREDIENTS: 99%
100%

EPA Reg. No. 3125-152

EPA Est. No. 3125-IA-1

STOP - READ THE LABEL BEFORE USE

KEEP OUT OF REACH OF CHILDREN

WARNING

(See Side Panel for Statements of Practical
Treatment and Other Precautionary Statements)

NET CONTENTS POUNDS

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION
P. O. Box 4913, Kansas City, MO 64120

Note: Underlined letters in chemical nomenclature should be italicized when printed, not underlined.

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SYSTEMIC 2 in 1 Insecticide

AVISO:

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

DIRECTIONS FOR USE

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

IMPORTANT: Read these entire Directions and Conditions of Sale before using SYSTEMIC 2 in 1 Rose Care.

CONDITIONS OF SALE: THE DIRECTIONS ON THIS LABEL WERE DETERMINED THROUGH RESEARCH TO BE THE DIRECTIONS FOR CORRECT USE OF THIS PRODUCT. THIS PRODUCT HAS BEEN TESTED FOR A RANGE OF WEATHER CONDITIONS SIMILAR TO THOSE WEATHER CONDITIONS THAT ARE ORDINARY AND CUSTOMARY IN THE GEOGRAPHIC AREA WHERE THE PRODUCT IS USED. INSUFFICIENT CONTROL OF PESTS AND/OR INJURY TO THE CROP TO WHICH THE PRODUCT IS APPLIED MAY RESULT FROM THE OCCURRENCE OF EXTRAORDINARY OR UNUSUAL WEATHER, OR FROM FAILURE TO FOLLOW LABEL DIRECTIONS. IN ADDITION, FAILURE TO FOLLOW LABEL DIRECTIONS MAY CAUSE INJURY TO OTHER CROPS, ANIMALS, MAN, OR THE ENVIRONMENT. MOBAY OFFERS, AND THE BUYER ACCEPTS AND USES, THIS PRODUCT SUBJECT TO THE CONDITIONS THAT EXTRAORDINARY OR UNUSUAL WEATHER, OR FAILURE TO FOLLOW LABEL DIRECTIONS ARE BEYOND THE CONTROL OF MOBAY AND ARE, THEREFORE, THE RESPONSIBILITY OF THE BUYER.

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, Systemic 2 in 1 Rose 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 Systemic 2 in 1 Rose Care is 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.

Systemic 2 in 1 ROSE CARE when used as directed kills:

Aphids (plant lice)	Mimosa webworm
Birch leaf miner	Pine tip moth
Holly leaf miner	Spider mites
Lace bug	Thrips
Leafhoppers	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.

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SYSTEMIC 2 in 1 Insecticide

HOW TO USE 2 in 1 ROSE CARE:

On Established Roses: The cap of this container will hold 1/3 cupful (2 ozs.) of SYSTEMIC 2 in 1 Rose Care. For established plants spread 1/3 cupful of SYSTEMIC 2 in 1 Rose Care (1 level capful) evenly around the base of each plant and work into 1 to 2 inches of soil. Water thoroughly.

When Planting New Bushes: Place 1/2 capful in the transplant hole with the soil as you fill. Mix the remaining 1/2 capful 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 SYSTEMIC 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. Plant seed or set plants and water thoroughly. Do not apply additional fertilizer for about 6 weeks.

On Potted Plants: Apply 1 level teaspoonful per 6-inch pot by punching a number of small holes into the pot soil with a pencil. Pour granules into the holes and thoroughly water the plants.

On ornamental Shrubs: Apply 2 capfuls of SYSTEMIC 2 in 1 Rose Care for each foot of shrub height (6 capfuls for a 3-foot high shrub). Distribute the required amount evenly from the base of 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 SYSTEMIC 2 in 1 ROSE CARE:

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

SYSTEMIC 2 in 1 ROSE CARE

10-10-10 PLANT FOOD

MINIMUM GUARANTEED ANALYSIS

Total Nitrogen (N)	10%
Derived from ammonium nitrate, ammonium sulfate, ammoniated phosphates and muriate of potash.	
Available Phosphoric Acid (P ₂ O ₅)	10%
Soluble Potash (K ₂ O)	10%
Total Available Primary Plant Food, not less than	30%

Potential acidity 600 lbs. calcium carbonate equivalent per ton.

RESTRICTIONS

Use this product only in accordance with label directions. Do not apply broadcast applications to lawns.

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SYSTEMIC 2 in 1 Insecticide

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING

Poisoning may occur as a result of exposure. May be fatal if swallowed. May be absorbed through skin. Do not breathe dust. Do not get in eyes, on skin or on clothing.

Do not contaminate feed or food. Keep out of reach of children. Wash thoroughly after handling. Food utensils such as a teaspoon or measuring cup should not be used for food purposes after use with insecticides. Keep children and pets off treated areas until product is worked into the soil and the treated areas have dried completely.

STATEMENTS OF PRACTICAL TREATMENT

If swallowed, vomiting should be induced. Administer water freely and induce vomiting by giving one dose (1/2 oz. or 15 ml.) of syrup of ipecac. If vomiting does not occur within 10 to 20 minutes, administer second dose. Repeat until vomit fluid is clear. Never give anything by mouth to an unconscious person. Have patient lie down and keep quiet. Professional medical assistance should be secured immediately.

If inhaled, remove victim to fresh air. Apply artificial respiration if indicated. If on skin, remove contaminated clothing and wash affected areas with soap and water. if in eyes, flush eyes with plenty of water. Call a physician if irritation persists.

Note to Physician: O,O-Diethyl S-[2-(ethylthio)ethyl] phosphorodithioate is a cholinesterase inhibitor. Atropine sulfate is antidotal only if signs of cholinesterase inhibition are present. 2-PAM is also antidotal and may be administered in conjunction with atropine.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not apply directly to water or wetlands. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes. Cover or incorporate spills.

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Do not reuse empty container. Securely wrap original container in several newspaper and put in trash collection.

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed above. In spill or leak incidents, keep unauthorized people away. You may contact the Mobay Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Mobay Kansas City Emergency Response Telephone No. is 816-242-2582, or contact Chemtec at 00-424-9300.