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out



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 23 1994

**COPY FOR YOUR
INFORMATION**

KAREN M. PITCHER
MILES, INC.
AGRICULTURAL DIVISION
8400 HAWTHORNE ROAD BOX 4913
KANSAS CITY, MO. 64120

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Label Amendment Submission of 07/16/93 in Response to PR Notice 93-7
EPA Reg. No. 3125-152
SYSTEMIC 2 IN 1 ROSE CARE 10-10-10 ROSE FOOD WITH SYSTEMIC

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE PRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1) of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stamped-accepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.

Sincerely,

[Signature]
James Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)



Recycled/Recyclable
Printed with Soy/Candle Ink on paper that
contains at least 50% recycled fiber

1085

SYSTEMIC 2 in 1 ROSE CARE

152-7903.YLD

20F
Base Pre-Reg (7903)

U.S. LABEL-IS)

Reason to Issue: To revise labeling to remove product from scope of Worker Protection Standard, PR Notice 93-7.

Date of Draft: 07/10/93(Pre-Reg)(P)

SYSTEMIC 2 in 1 ROSE CARE 10-10-10 ROSE FOOD WITH SYSTEMIC INSECTICIDE

For control of certain insects on roses, flowers, bulbs, bedding plants, potted plants or ornamental shrubs in interior plantscapes, home gardens, home greenhouses or ornamental gardens or parks.

ACTIVE INGREDIENT: (As related to insecticide content)

| | |
|---|------|
| Disulfoton (O,O-Diethyl S-[2-(ethylthio)-ethyl] phosphorodithioate) | 1% |
| INERT INGREDIENTS: | 99% |
| | 100% |

EPA Reg. No. 3125-152
EPA Est. No. 3125-IA-1

Net Contents: ___ Pounds

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)

AVISO

PRECAUCION AL USUARIO: Si usted no puede leer o entender inglés, 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.)

MILES 

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 25 1994

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

3125-152



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 warm water. Get medical attention immediately. 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. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by disposing of equipment washwaters.

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.

DIRECTIONS FOR USE

NOTE: Not for use in commercial greenhouses and nurseries.

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 insecticide.

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. MILES 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 MILES AND ARE, THEREFORE, THE RESPONSIBILITY OF THE BUYER.

SYSTEMIC 2 in 1 Insecticide

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)
- Birch leafminer
- Holly leafminer
- Lace bug
- Leafhoppers
- Mimosa 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 2 IN 1 ROSE CARE

On Established Roses: The cap of this container will hold 1/3 cupful (2 oz) 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 lb 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

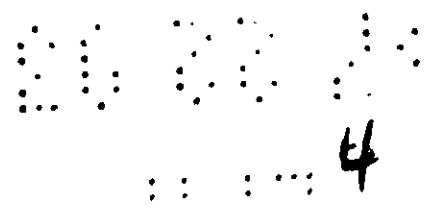
MINIMUM GUARANTEED ANALYSIS

| | |
|---|-----|
| 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 lb calcium carbonate equivalent per ton. | |

RESTRICTIONS

Use this product only in accordance with label directions.

Do not apply broadcast applications to lawns.



STORAGE AND DISPOSAL

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

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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 Miles Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Miles Kansas City Emergency Response Telephone No. is 816-242-2582, or contact Chemtrec at 800-424-9300.

Miles, Inc.
Specialty Products
Box 4913, Kansas City MO 64120-0013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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APR 23 1994

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INFORMATION**

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EPA Reg. No. 3125-152
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Sincerely,

James Tompkins
James Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

SYSTEMIC 2 in 1 ROSE CARE

152-7903.YLD

Base Pre-Reg (7903)

U.S. LABEL-(S)

Reason to Issue: To revise labeling to remove product from scope of Worker Protection Standard, PR Notice 93-7.

Date of Draft: 07/10/93(Pre-Reg)(P)

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EPA Reg. No. 3125-152
EPA Est. No. 3125-IA-1

Net Contents: ___ Pounds

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KEEP OUT OF REACH OF CHILDREN

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

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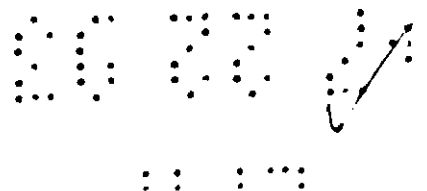
MILES 

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 25 1994

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

3125-152



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.

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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.

DIRECTIONS FOR USE

NOTE: Not for use in commercial greenhouses and nurseries.

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 insecticide.

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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. MILES 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 MILES AND ARE, THEREFORE, THE RESPONSIBILITY OF THE BUYER.

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- 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.

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WHEN TO USE SYSTEMIC 2 IN 1 ROSE CARE

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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 lb calcium carbonate equivalent per ton. | |

RESTRICTIONS

Use this product only in accordance with label directions.

Do not apply broadcast applications to lawns.



STORAGE AND DISPOSAL

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

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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 Miles Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Miles Kansas City Emergency Response Telephone No. is 816-242-2582, or contact Chemtrec at 800-424-9300.

Miles, Inc.
Specialty Products
Box 4913, Kansas City MO 64120-0013