



003125-00517-051999

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Systems Integration Group, Inc.

PM03

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3125-517

5/19/99

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MAY 19 1999

John S. Thornton
Director, Product Registrations
and Regulatory Affairs
Bayer Corporation
Agriculture Division
8400 Hawthorn Road
P.O. Box 4913
Kansas City, MO 64120-0013

Subject: Amendment - Label Revision
Flower, Rose & Shrub Care
EPA Registration No. 3125-517
Your submissions dated March 5, 1999

Dear Mr. Thornton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

1. Delete the phrases: "LOW ODOR" from the front panel of the label. "Low Odor" is a subjective statement and there are no product chemistry data to support this claim. The phrase "New" may be used only for a period of 6 months after the release of the product in the marketplace.
2. Delete the phrases: "ADVANCED PROTECTION FORMULA" and "ADVANCED FORMULA" from the front panel of the label. There has been no change in your CSF since the initial registration.
3. In the "Minimum Guaranteed Analysis" section, change XX% to numerical values.

4. Reinstating the Note to Physician paragraph beneath the First Aid Information. We regret that this was not brought to your attention in our last letter. Although we encourage

SYMBOL	7505C	CONCURRENCES					
SURNAME	Spind						
DATE	5/19/99						

addition of an "800" number, this does not negate the need for the Note to Physician especially for an OP pesticide.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

cc: Phil Poli

Reason to Issue: To revise use directions.

Date of Pre-Reg Draft: 03/04/99 (B)

[FRONT PANEL]

Flower, Rose & Shrub Care

READY TO USE
GUARANTEED SATISFACTION
NEW!
LOW ODOR
MEASURING-CUP CAP
ADVANCED FORMULA
FEEDS PLANTS & KILLS INSECTS

- ADVANCED PROTECTION FORMULA:
- Feeds & Protects for 6 Weeks
 - Feeds & Protects Against Insects for 6 weeks
 - Kills Lacebugs, Spider Mites and Other Harmful Insects
 - Kills Harmful Insects and Spider Mites
 - Promotes Development of Roots and Blooms
 - Rainproof Protection - Won't Wash Off

- FOR USE ON:
- Azaleas, Camellias and Rhododendrons
 - Flowering Shrubs, Trees
 - Flowers, Roses, Shrubs

- TWO-WAY PROTECTION:
- Feeds and Protects Against Insects for 6 weeks
 - Promotes Beautiful Roses, Shrubs and Flowers

- DOUBLE ACTION FORMULA:
- Feeds Plants
 - Kills Harmful Insects and Spider Mites
 - Promotes Development of Roots and Blooms

When applied according to directions, Flower, Rose & Shrub Care provides the proper amount of plant food and systemic insecticide necessary to maintain strong, healthy roses. Flower, Rose & Shrub Care protects roses from the damage normally caused by sucking insects (such as aphids, leafhoppers, spider mites and thrips) and certain chewing insects. In addition, Flower, Rose & Shrub Care also provides protection for

- roses
- flowers
- bedding plants
- ornamental shrubs

Net Contents: 2 or 5 Pounds

STOP - Read This Label Before Use
KEEP OUT OF REACH OF CHILDREN
For Outdoor Residential Use Only

WARNING

MAY BE FATAL IF SWALLOWED

See back panel booklet for ingredients and precautionary statements

APPROVED FOR REGISTRATION
 MAY 19 1999
 3125-517

[BACK PANEL]

**Quick Facts
(Product Facts)**

- ✓ Feeds and protects in one easy step
- ✓ Kills insects where they hide
- ✓ Long-lasting, systemic protection that won't wash off
- ✓ Easy to use granules
- ✓ Kills leafminers, beetles, & other hard-to-reach insects

KILLS	Art: aphid, birch leafminer, spider mite, whitefly, lacebug	
	Aphids	Mimosa webworms
	Birch leafminers	Pine tip moths
	Elm leaf beetles	Spider mites
	Holly leafminers	Thrips
	Lacebugs	Whiteflies
	Leafhoppers	
	FEEDS	16-8-8 fertilizer for strong roots & blooms (optional) 12-18-6 fertilizer for strong roots & blooms (optional)
COVERAGE	Treats up to 16 medium-sized shrubs (2 lb size) Treats up to 40 medium-sized roses (5 lb size)	
WHERE TO USE	Azaleas, Camellias, Rhododendrons (optional) Flowers, roses, shrubs (optional)	
WHEN TO USE	Every 6 weeks throughout the growing season	
HOW MUCH TO USE	Use measuring-cup cap to apply as directed	
ART: GRAPHIC of PHONE GRAPHIC of TERMINAL	Questions, comments, or medical information: 1-800-842-8020 www.bayer.com	

If you use Flower, Rose, & Shrub Care as directed and are not completely satisfied, we will promptly refund your money. For details, call us at 1-800-842-8020.

Ingredients

ACTIVE INGREDIENT:

Disulfoton	1.00%
OTHER INGREDIENTS*	99.00%
	100.00%

* Other Ingredients include: fertilizer, glycols and fragrance

EPA Reg. No. 3125-517

EPA Est. No. XXXX-AA-1

**Flower, Rose & Shrub Care
Plant Food Minimum
Guaranteed Analysis**

Total Nitrogen (N)	XX%
Available Phosphoric Acid (P ₂ O ₅)	XX%
Soluble Potash (K ₂ O)	XX%
Total Available Primary Plant Food, not less than	XX%

**PRECAUTIONARY
STATEMENTS:
Hazards to Humans and
Domestic Animals**

- Poisoning may occur as a result of exposure.
- May be fatal if swallowed.
- Avoid breathing dust.
- Do not get in eyes, on skin, or on clothing.
- Wash thoroughly with soap and water after handling.

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Flower, Rose & Shrub Care

First Aid

The table below describes the first aid procedures for incidents involving Flower, Rose & Shrub Care.

IN THE CASE OF ACCIDENTAL...	IMMEDIATELY...
Swallowing	If the person is able to swallow: <ul style="list-style-type: none"> • Have them sip 1 to 2 glasses of water. • Call a doctor or poison control center for further treatment advice.
Inhalation	<ul style="list-style-type: none"> • If breathing is affected, move person to fresh air. • Contact doctor or poison control center for further treatment advice. • If not breathing, call an ambulance and give artificial respiration.
Contact with Skin	<ul style="list-style-type: none"> • Remove contaminated clothing. • Wash affected skin with soap and warm water. • Call a doctor if irritation occurs.
Contact with Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water. • Continue to rinse eye for 10 to 15 minutes. • Call a doctor if irritation persists.
<p>NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. you may call 800-414-0244 for medical emergency information. Active ingredient: Disulfoton [CAS # 298-04-04]</p>	

Environmental Hazards

- This pesticide is toxic to fish and wildlife. Do not apply directly to water.
- This pesticide is toxic to bees exposed to direct application.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, be sure to read and follow all label directions.

Before You Use

Read and follow these directions when using:

- Do not apply near fish pools, ponds, streams or lakes.
- Food utensils such as teaspoons or measuring cups 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, watered, and the treated areas have dried completely.
- Wear rubber gloves when handling.

How to Use

WHEN TO USE
 Apply when planting. For established plants, use any time after new growth appears. Apply again every 6 weeks during the growing season.

HOW MUCH TO USE	HOW TO APPLY
Fill measuring cap to top of inner circle.(2 oz) Four rounded tablespoons equals 2 oz Azaleas, Camellias, & Rhododendrons 2 capfuls per foot of plant height Roses: 1 capful per plant Shrubs: 2 capfuls per foot of plant height. Flower beds: 2 capfuls per 12 sq ft (3' x4' bed area)	1. Apply granules to soil around base of plant, sprinkling evenly in the area under the branches. (ART) 2. Work granules into top 1 to 2 inches of soil. (ART) 3. Water thoroughly after applying. (ART) For flower beds, sprinkle granules evenly over the bed.

Children and pets may re-enter after the treated area has been watered and allowed to dry.

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Flower, Rose & Shrub Care

ART--Show cultivation and what is meant by area under the branches. May combine with diagram that shows systemic action for box labeled "how it works".

HOW IT WORKS

This product is absorbed by roots and moves through the entire plant. Even new growth is fed and protected against insects for up to 6 weeks. Rain or watering cannot wash off this internal protection.

(LEGEND FOR ART:) Systemic Action Protects Up to 6 Weeks
(ART --Diagram showing systemic intake. Can combine with art from directions.)

For Best Results: Apply evenly, cultivate lightly and water thoroughly.

IMPORTANT: Directions for Storage and Disposal

Storage Conditions

Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

Disposal

- Do not reuse empty container.
- Completely empty container.
- Wrap the empty container in several layers of newspaper.
- Place container in trash.

Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines.

NOTICE

Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Flower, Rose & Shrub Care under expected conditions.

The Buyer assumes responsibility for lack of performance or safety if the product is not used according to the directions on this label.

