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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3125-517

11/8/99

1917



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 8 1999

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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/Alternate Brand Name
Rose, Shrub & Flower Care
EPA Registration No. 3125-517
Your submission dated October 22, 1999

Dear Mr. Thornton:

This letter supercedes our letter of November 1, 1999. 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. Submit two copies of the finished labeling before you release the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. Reinstate the statement "For Outdoor Residential Use Only" to the front panel of the label.

Since the labeling submitted with your October 22, 1999 letter is substantially similar to that approved on July 28, 1999, is in finished format and the above requested revisions do not raise risk concerns associated with the use of this product, we will allow you to use this labeling for a period not to exceed January 31, 2000. Products released for shipment after January 31, 2000 must bear labeling revised in accordance with this letter.

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

Sincerely,

George T. LaRocca
Product Manager 13

Table with columns for SYMBOL, SURNAME, DATE, and CONCURRENCES. Includes handwritten entries: 7505C, SPROAT, 11/8/99, Enclosure.

3125-517 2/7

NOV 8 1999

3125-517



**2-in-1 Systemic
Rose & Flower Care**

READY-TO-USE GRANULES

- ▶ Feeds and protects against insects for 6 weeks
 - ▶ Promotes strong roots and beautiful blooms
 - ▶ Rainproof protection
- 12-18-6**

KEEP OUT OF REACH OF CHILDREN
WARNING See back panel for ingredients and precautionary statements
MAY BE FATAL IF SWALLOWED
025011 RL

NET WT 2 LBS (907gm)



2-in-1 Systemic Rose & Flower Care

READY-TO-USE GRANULES

Bayer Advanced Garden's 2-in-1 Systemic Rose & Flower Care's exclusive formula feeds your plants and protects against insects for up to six weeks. Now you can grow beautiful roses and flowers in one easy step.

©1998 Bayer
Distributed by:
Bayer Corporation
Garden & Professional Care
Box 4913
Kansas City, MO 64120-0913
EPA Reg. No. 3123-517
EPA Est. No. 34704-NP-003
Bayer and are registered trademarks of Bayer AG
Made in USA



FIRST AID

IN THE CASE OF ACCIDENTAL...	IMMEDIATELY...
SWALLOWING	<ul style="list-style-type: none"> 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.

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.

For medical emergency information, you may call toll-free 1-877-229-3763. Active ingredient: Disulfoton [CAS # 298-04-4]

Note to Physicians: Disulfoton is an organophosphate. Prolonged exposure will cause cholinesterase depression. Atropine sulfate is antidotal. 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.
- This pesticide is toxic to bees exposed to direct application.

NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of 2-in-1 Systemic Rose & Flower 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.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

PRESS TO RESEAL

919911 R2

TOTAL NUMBER OF PAGES MUST BE
 DIVISIBLE BY FOUR.

Back
 Cover

Front
 Cover

3.5"

1/4"

1/4"

1/8"

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.

PRECAUTIONARY STATEMENTS

WARNING

- 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.

READ THE LABEL FIRST!

QUICK FACTS

KILLS Aphids, Birch Leafminers, Elm Leaf Beetles, Holly Leafminers, Lacebugs, Leafhoppers, Mimosa Webworms, Pine Tip Moths, Spider Mites, Thrips, Whiteflies

FEEDS 12-18-6 fertilizer for strong roots and blooms

COVERAGE Treats up to 40 medium-sized roses

WHERE TO USE Roses, Flowers & Shrubs

WHEN TO USE Every 6 weeks throughout the growing season

HOW MUCH TO USE Use easy measuring cap to apply as directed

For questions or comments, call toll-free 1-877-BayerAG www.AdvancedGarden.com

OPEN
Resealable Label for Directions & Precautions

INGREDIENTS

ACTIVE INGREDIENT: Disulfoton 1.00%

OTHER INGREDIENTS*: 99.00%

*Other ingredients include: fertilizer, glycols and fragrance 100.00%

GUARANTEED ANALYSIS 12-18-6

Total Nitrogen (N)	12%	Derived from: Ammonium Sulfate, Ammoniated Phosphates, Sulfate of Potash F1339
12% Ammoniacal Nitrogen		
Available Phosphate (P ₂ O ₅)	18%	
Soluble Potash (K ₂ O)	6%	
Sulfur (S)	11%	
11% Combined Sulfur (S)		

Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-stailes.com>.

919911 RLO

Even #
 Pages

Odd #
 Pages

3.5"

1/4"

1/4"

1/4"

DIRECTIONS FOR USE

Read the product label for use 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.

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


Fill measuring cap to top of inner circle (2 oz)
 Four rounded tablespoons equals 2 oz

Roses: 1 capful per plant
 Shrubs: 2 capfuls per foot of plant height
 Flower beds: 2 capfuls per 12 sq ft (3' x 4' bed area)

DIRECTIONS FOR USE (cont'd)


HOW TO APPLY

1. Apply granules to soil around base of plant, sprinkling evenly in the area under the branches.
2. Work granules into top 1 to 2 inches of soil.
3. Water thoroughly after applying. 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.

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.



FOR BEST RESULTS

Apply evenly, cultivate lightly and water thoroughly.

2.375"

2.375"


3125-517

5/7
8

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 8 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
3125-517



Bayer

**ADVANCED
GARDEN™**

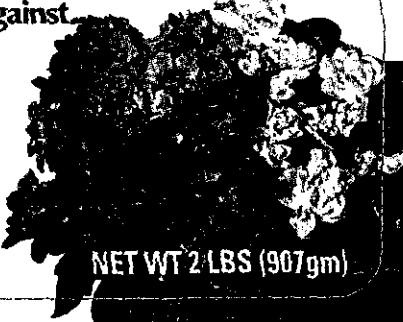
2-in-1 Systemic
Azalea, Camellia &
Rhododendron Care

READY-TO-USE GRANULES

- ▶ Feeds and protects against insects for 6 weeks
- ▶ Promotes strong roots and beautiful blooms
- ▶ Rainproof protection

16-8-8

KEEP OUT OF REACH OF CHILDREN
WARNING See back panel booklet for ingredients and precautionary statements
MAY BE FATAL IF SWALLOWED
SC8914 R.O



NET WT 2 LBS (907gm)

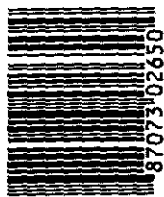


2-in-1 Systemic Azalea, Camellia & Rhododendron Care

READY-TO-USE GRANULES

Bayer Advanced Garden's 2-in-1 Azalea, Camellia, & Rhododendron Care's exclusive formula feeds your plants and protects against insects for up to six weeks. Now you can grow beautiful flowers and shrubs in one easy step.

Distributed by:
Bayer Corporation
Garden & Professional Care
Box 4913
Kansas City, MO 64170-0013
EPA Reg. No. 31125-517
EPA Est. No. 31704-NB-003
Bayer and are registered trademarks of Bayer AG
Made in USA



FIRST AID

IN THE CASE OF ACCIDENTAL... IMMEDIATELY...

SWALLOWING • If the person is able to swallow:
• Have them sip 1 to 2 glasses of water.
• Call a doctor or poison control center for further treatment advice.

INHALATION • 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 • Remove contaminated clothing.
• Wash affected skin with soap and warm water.
• Call a doctor if irritation occurs.

CONTACT WITH EYES • 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.

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.

For medical emergency information, you may call toll-free 1-877-229-3763. Active ingredient: Disulfoton (CAS # 298-04-4)

Note to Physician: Disulfoton is an organophosphate. Prolonged exposure will cause cholinesterase depression. Atropine sulfate is an antidote. 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.
- This pesticide is toxic to bees exposed to direct application.

NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of 2-in-1 Systemic Azalea, Camellia, and Rhododendron 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.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

PRESS TO RESEAL

91994 AD

TOTAL NUMBER OF PAGES MUST BE
 DIVISIBLE BY FOUR.

Back
 Cover

Front
 Cover

3.5"

1/4"

1/4"

1/8"

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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

WARNING

- 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.

READ THE LABEL FIRST!

QUICK FACTS

- Feeds and Protects in One Easy Step
- Easy-to-Use Granules

KILLS Aphids, Birch Leafminers, Elm Leaf Beetles, Holly Leafminers, Lacebugs, Leafhoppers, Mimosa Webworms, Pine Tip Moths, Spider Mites, Thrips, Whiteflies

FEEDS 16-8-8 fertilizer for strong roots and blooms

COVERAGE Treats up to 16 medium-sized shrubs

WHERE TO USE Azaleas, Camellias, Rhododendrons

WHEN TO USE Every 6 weeks throughout the growing season

HOW MUCH TO USE Use easy measuring cap to apply as directed

For questions or comments, call toll-free 1-877-BayerAG www.AdvancedGarden.com

ACTIVE INGREDIENT: Disulfoton 1.00%
OTHER INGREDIENTS: 99.00%
 100.00%
 *Other ingredients include: fertilizer, glycols and fragrance

GUARANTEED ANALYSIS 16-8-8

Total Nitrogen (N)	16%	Derived from: Ammonium Sulfate, Ammoniated Phosphates, Muriate of Potash, Iron Oxide, Zinc Oxide
Available Phosphate (P ₂ O ₅)	8%	F1339
Soluble Potash (K ₂ O)	8%	
Sulfur (S)	15%	Information regarding the contents and levels of metals in this product is available on the internet at http://www.regulatory-info-states.com .
15% Combined Sulfur (S)		
Total Iron (Fe)	1%	
Total Zinc (Zn)	1%	

919914 R.0

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DIRECTIONS FOR USE

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

BEFORE YOU USE

- 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 this insecticide.
- 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

Fill measuring cap to top of inner circle. (2 oz)
 Four rounded tablespoons equals 2 oz

Azaleas, Camellias, & Rhododendrons: 2 capsfuls per foot of plant height
 Shrubs: 2 capsfuls per foot of plant height
 Flower beds: 2 capsfuls per 12 sq ft (3' x 4' bed area)

DIRECTIONS FOR USE (cont'd)

HOW TO APPLY

- Apply granules to soil around base of plant, sprinkling evenly in the area under the branches.
- Work granules into top 1 to 2 inches of soil.
- Water thoroughly after applying.

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.

HOW IT WORKS

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

FOR BEST RESULTS

Apply evenly, cultivate lightly and water thoroughly.

2.375"

2.375"