

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

AUG 3 2000

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Marla K. Jackson
Agent for Voluntary Purchasing Groups, Inc.
P.O. Box 460
Highway 82 West
Bonham, TX 75418

Subject:

Amendment: Updated Labeling

Ferti Lome Rose Food Containing Systemic Insecticide

EPA Registration No. 7401-4

Your submission dated May 5, 2000

Dear Ms. Jackson,

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 labeling is enclosed for your records.

- 1. Revise the "Precautionary Statements" section of your label to read "May be fatal if swallowed or absorbed through skin. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, socks, waterproof footwear, and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse."
- 2. Move the statements "Do not contaminate food or foodstuffs. Keep children and pets off treated area until this product is worked into the soil and treated areas have dried completely." to the "Directions for Use" section of your label.
- 3. Reorder your "First Aid" statements to read:

"IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or a doctor.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

| 7505C | | SPRONT | | 08/03/00 | IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice".

With respect to your child-resistant packaging (CRP), the Agency has reviewed the certification regarding child-resistant packaging for EPA Registration No. 7401-4 and has found it to be acceptable regarding compliance with the standards of 40 CFR 157.32.

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

Sincerely

George T. LaRocca Product Manager 13

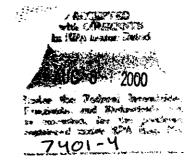
Insecticide Branch

Registration Division (7505C)

Enclosure

[FRONT LABEL PANEL]

## ferti-lome®



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# Rose Food containing Systemic Insecticide

#### **ACTIVE INGREDIENT:**

# KEEP OUT OF REACH OF CHILDREN WARNING

See Back/Side Label Panel for Additional Precautionary language

Net Weight \_\_\_\_\_

#### 14-12-11

#### **GUARANTEED ANALYSIS**

Total Nitrogen (N)	. 14.0%
3.25% Ammoniacal Nitrogen	
10.75% Urea Nitrogen	
Available Phosphate (P <sub>2</sub> O <sub>5</sub> )	. 12.0%
Soluble Potash (K <sub>2</sub> O)	11.0%
Boron (B) 0.02%	
Copper (Cu) 0.05%	
0.05% Water Soluble Copper (Cu)	
Iron (Fe) 0.10%	
0.10% Water Soluble Iron (Fe)	
Manganese (Mn) 0.05%	
0.05% Water Soluble Manganese (Mn)	
Zinc (Zn) 0.05%	
0.05% Water Soluble Zinc (Zn)	

Derived From: Sulfate of Ammonia, Urea Formaldehyde, Mono-ammonium Phosphate, Muriate of Potash, Sodium Borate Derivatives, Copper II Sulfate, Iron II Sulfate, Manganese II Sulfate, Zinc Sulfate.

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed or inhaled. Do not breathe dust. Rapidly absorbed through the skin. Do not get on skin, in eyes or on clothing. Wash hands thoroughly after handling and before eating or smoking. Do not contaminate food or foodstuffs. Keep children and pets off treated area until this product is worked into the soil and treated areas have dried completely. Wear protective clothing and cotton or natural rubber gloves. Cotton gloves should be laundered or discarded and rubber gloves washed with soap and water after each day's use.

#### [BACK/SIDE LABEL PANEL]

FIRST AID  Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>

#### NOTE TO PHYSICIAN

Disulfoton is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine. Questions? 1-800-424-9300

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#### **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and wildlife. Do not apply directly to water. 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. Application should be timed to coincide with period of minimum bee activity, usually between late evening and early for the morning.

#### [BACK/SIDE LABEL PANEL]

#### DIRECTIONS FOR USE

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

This package is sold by weight, not volume. Some settling may have occurred during shipping and handling.

1. WHAT IS THIS PACKAGE FOR? This package of ferti-lome® Rose Food containing Systemic Insecticide is for people who want richly colored roses and, at the same time, want to control aphids, lacebugs, leafhoppers, mites, thrips, whiteflies, birch leaf-miner, pine tip moth, mimosa webworm and red spider mites. This package treats approximately 40 bushes (average size).

#### 2. HOW TO USE IT?

#### **ROSES:**

- a. Individual Bushes: Apply 1% oz.(1 capful). Work lightly into soil and water thoroughly.
- b. Established Beds & Bushes: Apply 4 lbs. per 200 sq. ft. Mix lightly into soil.
- c. Planting New Bushes: Individual bushes--apply 14/3 oz.(1 capful) mixed into portion of soil placed in bottom of hole. Cover with 2 inches of plain soil. Plant bushes and water thoroughly. Planting new bushes in beds-apply 4 lbs. per 200 sq. ft. Work lightly into soil and water thoroughly. Monthly feedings of ferti-lome® Rose Food containing Systemic Insecticide during the growing season will produce vigorous bushes with colorful blooms and control insects at the same time.

FLOWERS, BULBS, & BEDDING PLANTS: Apply 4 lbs. per 200 sq. ft. Mix lightly into soil and water thoroughly.

ORNAMENTAL SHRUBS, AZALEAS, GARDENIAS, IVY AND OTHER SHRUBS: Apply 1½ lbs. per inch of trunk diameter. Spread uniformly from near trunk out to drip line on all sides. Work lightly into soil and water thoroughly.

3. HERE ARE THE RESULTS YOU MAY EXPECT! Research has proven that ferti-lome® Rose Food containing Systemic Insecticide used according to directions will give roses beautiful flower blooms and result in vigorous growing shrubs.

Sincerely, the ferti-lome® people

#### [BACK/SIDE LABEL PANEL]

IMPORTANT: Do not apply to plants to be used for animal or human consumption. Application at higher than recommended rates may cause phytotoxicity. Do not apply broadcast to lawns. This product is not intended for nor recommended for container grown plants. For container grown plants, we recommend ferti-lome® Blooming & Rooting Soluble Plant Food.

#### STORAGE AND DISPOSAL

STORAGE: Store in original container and place in a locked storage area. DISPOSAL: Do not reuse container. Wrap container and put in trash.

NOTE: Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith. Voluntary Purchasing Groups, Inc. warrants this product to conform to the chemical description on the label and for the purposes stated on the label. The limit of any liability incurred shall be the purchase price paid by the user or buyer.

VOLUNTARY PURCHASING GROUPS, INC. P.O. BOX 460 BONHAM, TX 75418

> EPA Reg. No. 7401-4 EPA Est. No. 7401-TX-1