

8660-252

03/19/2007

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Eric D. Smith
Sylorr Plant Corp.
Division of United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114

MAR 19 2007

Dear Mr. Smith:

Subject: Labeling Amendment; Update of Labeling Format
Pursell PM with Imidacloprid & Fertilizer
EPA Registration No. 8660-252
Submission Date: January 26, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

1. The following are considered heightened efficacy claims and must be deleted from the label:
 - "Grows bigger plants & more blooms than ordinary potting soils"
 - "Contains water-holding crystals to protect against over- and under-watering."
2. Throughout the label, delete all references to "Exclusive Formula".
3. Within the Notice section of the label, replace the sentence "Buyer assumes all responsibility for..." with "To the extent consistent with applicable law, buyer assumes all responsibility for...".
4. The optional seal stating that this product is certified by the Mulch and Soil Council must be deleted. The Agency discourages any endorsements on labeling.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 206-0415.

Sincerely,

A handwritten signature in cursive script that reads "Venus Eagle".

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Pursell PM with Imidacloprid & Fertilizer

For Residential Use with Indoor & Outdoor Container Plants

[Triple Action Formula!] • [Ready to Use] • [Insect control kills plant damaging insects] [for up to 3 months] • [Potting mix with Long-lasting [3 month] insect protection] • [Enriched with Plant Food] • [Long-lasting] premium fertilizer] • [Starts feeding instantly] • [Feeds for up to] [3, 6, 9 months] • [Moisture crystals help plants get the right amount of water] • [Absorbs excess water] • Aids in proper drainage] • [Water [moisture] control [formula] • [Grows bigger plants & more blooms than ordinary potting soils] • [Dual Action Feeding! Feeds now and for up to [3, 6, 9 months]]. • [For All Indoor and Outdoor Container Plants] • [Contains water-holding crystals to protect against over- and under-watering] • [Spend Less Time Watering!] • [Moisture Crystals help keep soil moist] • [Slowly releases water as plants need it] • [with Aqua Guard Water Control Formula, Water-Holding Crystals release water as plants need it] •

Active Ingredient:

Imidacloprid.....	0.011%
Other Ingredients	98.989%
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for First Aid and Precautionary Statements.

Net Weight: 4.8 lb (2.1 kg), 7.7 lb. (3.4 kg), 12.3 (5.6 kg), 15.4 lb. (6.8 kg), 18.4 lb. (8.4 kg), 24.7 lb (11.2kg), 30.8 lb. (14 kg), 37 lb. (16.8 kg)

Net Contents: 10 qt (11L), 16 qt (17.6L), 1 cu ft (28.3L), 32 qts (35.2L), 1.5 cu ft (42.2L), 2 cu ft (56.3L), 2.5 cu ft (70.8L), 3 cu ft (85L)

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

MAR 19 2007

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
8660-252**

[Bracketed Text] = Optional language

KILLS Adelgids, Aphids, Japanese Beetles, Lacebugs, Leafminers, Mealybugs, Root Weevil Complex (such as Blackvine Weevil, Apopka Weevil), Scale Insects, Thrips (suppression), Whiteflies and White Grubs

Guaranteed Analysis

Total Nitrogen (N).....x.xx%
 x.xx% Ammoniacal Nitrogen
 x.xx% Urea Nitrogen*
 Available Phosphate (P₂O₅).....x.xx%
 Soluble Potash (K₂O).....x.xx%
Derived From: Polymer-coated urea: urea, diammonium Phosphate, and Potassium Sulfate

*x.xx% Slowly available nitrogen from coated urea.

When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials.

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

STOP. READ THE ENTIRE LABEL BEFORE USE.

DIRECTIONS FOR USE

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

BEFORE YOU USE Read and follow these directions when using:

- Do not apply near fish pools, ponds, streams or lakes
- Do not use this mix for potting edible food plants, fruits, vegetables or herbs.
- Use clean containers and tools when planting or transplanting. Rinse containers and tools thoroughly.
- Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with insecticides.
- Wear rubber gloves when handling.

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HOW TO USE:**Container Gardening and Repotting:**

- 1) **Select a New Container:** Choose a container that is at least two sizes larger than the old one and has drainage holes.
- 2) **Remove Plant from Current Container:** Tap the container on its side 2-3 times to loosen the plant. Turn container upside down in your hand (or on its side if the container is large). Gently slide the plant out. If the rootball is tightly wound, slice it in 2-3 places. This will allow the roots to grow out into the new potting mix.
- 3) **Place Plant in New Container:** Add a layer of potting mix to the bottom of the container. [No gravel or chips are needed on the bottom.] Put the plant in the container. Fill the rest of the container with potting mix. Press the soil down slightly. Make sure the base of the plant stem remains at its original soil level; do not place the plant deeper in the mix than it originally was. Leave 1/2 - 3/4" of space between the top of the potting mix and the lip of the container.
- 4) **Water:** Water the potting mix thoroughly. Ensure that the container drains well. Keep the mix moist, but not wet. To help ensure that the roots can absorb the insecticide, do not water too heavily for the first 10 days.

[Seed Starting:

Fill container with potting mix. Plant seeds according to package instructions. Water thoroughly. For best results, keep the seeds in a moist environment at temperatures of 70-80° F. Keep potting mix moist to the touch. A plastic bag or cover may be placed over the container to preserve moisture. Once new seedlings have developed two sets of leaves, they may be transplanted into larger containers or outdoors.]

For Best Results:

Although this product provides primary nutrients for up to 9 months, plants that are watered more than once per week may need supplemental feeding. [For vigorous growth and beautiful blooms, use Sta-Green, Expert Gardener, Vigoro or Schultz Family of Plant Foods.]

[Why This product?]

[This product is formulated with the finest horticultural ingredients to give you the performance you desire. Premium Ingredients including Canadian sphagnum peat moss and horticultural perlite. Exclusive Formula.]

1. [Fast-release plant food for vigorous start]
2. [Slow-release plant food that feeds up to 9 months]

[Wetting Agent helps water and soluble nutrients be distributed through the soil.]

- o [A rich mix of Canadian sphagnum peat moss, perlite, composted organic material and a wetting agent provides an excellent growing medium for moisture retention and aeration for hearty plants]
- o [Special polymer watering crystals absorb and store water and then slowly release moisture to plant roots, allowing a consistent moisture level longer than standard potting soils.]

- o [Schultz, Vigoro, Expert Gardener, or Sta-Green] extended feed plant food feeds for up to 9 months and helps eliminate overfeeding and burning.]

Helpful Hints:**Hints for Growing Indoor Container Plants**

- o **Lighting Requirements:** Too much or too little light can have harmful effects on indoor houseplants. Foliage plants grow favorably in low light while flowering plants typically flourish in bright, indirect light.
- o **Water Requirements:** Generally, watering is needed when the top 1 to 2 inches of the soil are dry to the touch. When required, water plants thoroughly and allow to drain.
- o **Feeding Requirements:** A general rule is to fertilize every 2 weeks during the spring and summer months and every 4 weeks during the fall and winter months. Feed with [Vigoro, Sta-Green, Expert Gardener or Schultz] Plant Food for best results.

Hints for Growing Outdoor Container Plants

- o **Lighting Requirements:** It is always best to refer to the plant tag for light requirements, as some plants thrive in the sun while others prefer the shade.
- o **Water Requirements:** Outdoor container plants can dry out very quickly, especially if exposed to full sun. Soil should be checked for moisture at least once a day, and in hot, dry weather, twice a day.
- o **Feeding Requirements:** Outdoor container plants also require more frequent feedings than indoor houseplants, especially in the spring and summer months. Feed with [Vigoro, Sta-Green, Expert Gardener or Schultz] Plant Food for best results.

[Tips for Spectacular Results! Tips for Perfect Container Gardens!]

- o **[Lighting:** Read plant labels and group plants that like similar conditions of sunlight and moisture.]
- o **[Watering:** Water when the soil is slightly dry to the touch. Do not overwater plants. Watering needs may change as plants increases in size.]
- o **[Soil Covers:** Soil coves such as Schultz Spanish Moss, Green Moss and Potting Bark help retain moisture, shade soil from hot sun, and give containers a finished appearance.]
- o **[Feeding:** Although this product provides primary nutrients for up to 9 months, plants that are watered more than once per week may need supplemental feeding. For vigorous growth and more blooms use [Schultz, Vigoro, Sta-Green or Expert Gardener] Plant Food for best results.]

[Do My Plants Need Repotting?]

[Check for these common signs:]

- o [Roots growing from drainage holes or appearing on soil surface]
- o [Wilting or yellowing leaves]
- o [Little or no new growth]

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STORAGE AND DISPOSAL

Storage: Store product in original container. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid prolonged contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

FIRST AID

If Swallowed	<ul style="list-style-type: none"> • Call a Poison Control Center or doctor immediately for treatment advice. • Have 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 doctor. • Do not give anything by mouth to an unconscious person.
If on Skin or Clothing	<ul style="list-style-type: none"> • 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.
If in Eyes	<ul style="list-style-type: none"> • 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 eye. • Call a Poison Control Center or doctor for treatment advice.

Note: Have this product label with you when calling a Poison Control Center or doctor, or going for treatment.

Environmental Hazards

This product is highly toxic to aquatic invertebrates. Do not dispose of potting mix in lakes, streams or storm sewers.

[Questions or Comments? call 1-800-332-5553]

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions

Made in the USA for Sylorr Plant Corp.
 P. O. Box 142642
 St. Louis, MO 63114-0642

EPA Reg. No. 8660-252 EPA Est. No. 9688-MO-1 © 2007

This package is filled by volume. Some settling may occur during shipment.

[Guaranteed by Sylorr Plant Corp.
 Marketed Exclusively by Wal-Mart Stores, Inc.]

INGREDIENTS: This potting soil is regionally formulated with materials (derived from one or more of the following: reed-sedge peat, composted forest products and/or composted rice hulls), Canadian sphagnum peat moss, horticultural perlite, ground dolomitic limestone (pH adjuster), a wetting agent, water-holding polymer "crystals" (potassium polyacrylamide copolymer), fertilizer and Imidacloprid insecticide. Product may vary from region to region.

In Georgia, this product contains 45%-55% composted pine bark, Canadian sphagnum peat moss, horticultural perlite, ground dolomitic limestone (pH adjuster), a wetting agent, water-holding polymer "crystals" (potassium polyacrylamide copolymer) fertilizer and Imidacloprid insecticide.

In California, this product contains: composted forest products, Canadian sphagnum peat moss, horticultural perlite, ground dolomitic limestone (pH adjuster), a wetting agent, water-holding polymer "crystals" (potassium polyacrylamide copolymer) fertilizer and Imidacloprid insecticide

In New Hampshire, this product contains reed-sedge peat, Canadian sphagnum peat moss, horticultural perlite, ground dolomitic limestone (pH adjuster), a wetting agent, water-holding polymer "crystals" (potassium polyacrylamide copolymer) fertilizer and Imidacloprid insecticide.

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Optional Marketing Paragraphs for Supplemental Distributor Brands

[Sta-Green Complete (Smart Soil Plus) Potting Mix exclusive formula combines premium growing mix with three added benefits: Sta-Green Plant Food, 3-month protection from damaging insects and moisture crystals for moisture control.]

[AquaGuard Water Control Formula]

Sta-Green Potting Mix is formulated with an exclusive AquaGuard Water Control Formula, a combination of moisture-holding polymers and a wetting agent. When plants are watered, the moisture-holding polymers swell into a gelatin-like form, absorbing many times their weight in water. As plants roots draw moisture from the potting mix, the polymers slowly release water, helping maintain a more consistent moisture level longer than standard potting mixes. The wetting agent provides more uniform water distribution in the soil, helping prevent dry spots in the mix. AquaGuard Water Control Formula helps provide the best growing environment for beautiful plants and flowers.]

[THE STA-GREEN PROMISE

YOUR SATISFACTION GUARANTEED OR YOUR MONEY BACK!

If you use STA-GREEN Complete (Smart Soil Plus) Potting Mix as directed and are not completely satisfied, send proof of purchase from this package and the original cash register receipt to the address below. We will refund the purchase price you paid.]

[www.sta-green.com

LOOK! For other quality STA-GREEN planting mixes and fertilizers. For more information about STA-GREEN products, visit us on the web at www.sta-green.com or call our Customer Service Hotline 1.877.341.9620]

[If you use Vigoro Complete (Smart Soil Plus) Potting Mix as directed and are not completely satisfied, send proof of purchase from this package and the original cash register receipt to the address below. We will refund the purchase price you paid.]

[Visit us on the Internet or call our Customer Satisfaction Hotline Vigoro.com or 1-800-561-1333]

[When you choose Expert Gardener products, you can be assured of the highest quality and performance in your lawn and garden. If for any reason you are not completely satisfied with this product, we will refund the purchase price you paid. Please mail your name, address and proof of purchase (dated receipt and package UPC/barcode) to the address below. Also, to ensure quality control, please write us a brief note explaining your experience with our product and reason for seeking refund.]

Optional



CERTIFIED PRODUCT

	<input checked="" type="checkbox"/>	Premium Potting Soil
	<input type="checkbox"/>	Standard Potting Soil
	<input type="checkbox"/>	Landscape Soil & Soil Amendment
	<input type="checkbox"/>	Specialty Soils
	<input type="checkbox"/>	Mulch

This product has been registered and tested for conformance to the standards of the Mulch & Soil Council for the indicated product category. The Mulch & Soil standards do not cover the product category for pesticides, and this certification does not apply to pesticide claims. For more information, visit the MSC website at www.mulchandsoilcouncil.org.