

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 2 1991

653-196340
17/5332574

Mr. Jay Daniels
Ross Daniels, Incorporated
1720 Fuller Road
West Des Moines, IA 50265

Dear Mr. Daniels,

Subject: Reregistration of Products Containing Disulfoton
Ross Systemic Insecticide Root Feeder Cartridges
EPA Registration Number 9649-1
Your Submissions Dated April 26, 1985 and April 21, 1987

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1. Add the common name "Disulfoton" preceding the chemical name in the label ingredient statement.

2. Under the Note to Physician, change "organic phosphate" to "organophosphate." Add "by injection" in "...atropine sulfate by injection in antidotal." Change "...and may be used in conjunction..." to "...and may be administered, but only in conjunction..."

3. Add the following under Environmental Hazards:

Do not contaminate water when disposing of equipment washwaters.

4. The Directions for Use are generally unclear. An inexperienced homeowner could benefit from a short explanation of the method of use for this product (i.e., instructions on the set-up with reference to the cartridges, chamber, feeder tube and garden hose). Furthermore, questions on the actual use of the product arise; for example: If no more than one cartridge is to be used in the chamber at a time, how does one administer a two cartridge dose? If only 1/2 a cartridge is used during application, how is the other 1/2 stored/disposed of?

CONCURRENCES

| | | | | | | | |
|---------|--------|--|--|--|--|--|--|
| SYMBOL | | | | | | | |
| SURNAME | JM | | | | | | |
| DATE | 5/1/91 | | | | | | |

A review of the Agency's files revealed a label formerly used for this product that answers many of the above questions. A copy of that label is enclosed for your information. We suggest you review that label and revise your new label by incorporating the improved Directions For Use.

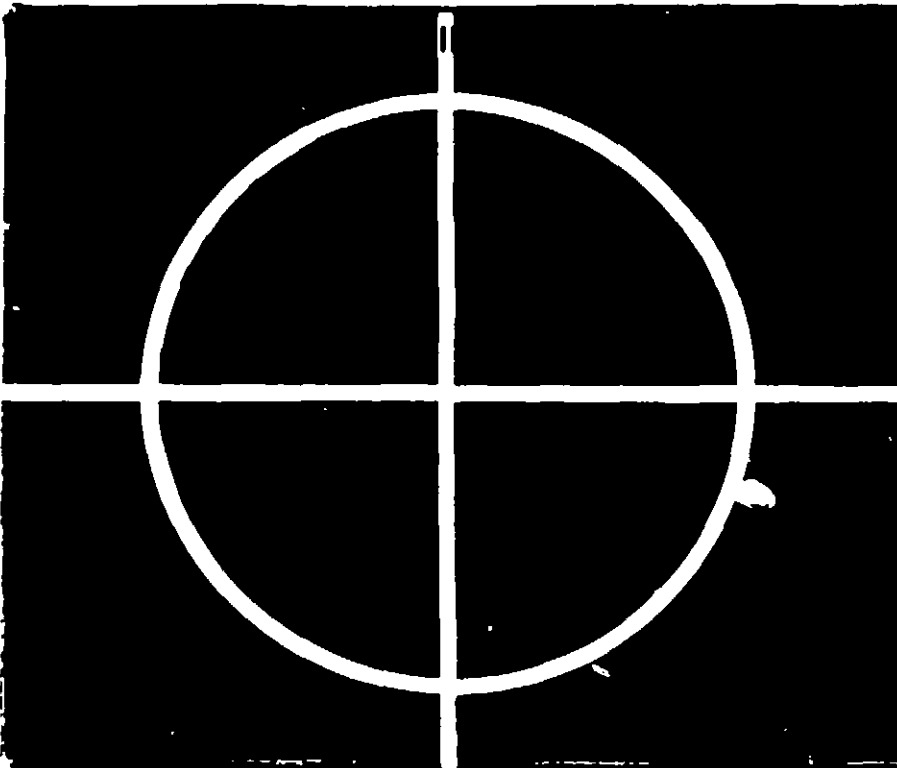
Submit five copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure



KILLS INSECTS AND PROTECTS TREES, EVERGREENS, ROSES & SHRUBS FROM WITHIN

ROSS

Systemic Insecticide Root Feeder

CONTAINS 2% DI-SYSTON

Active Ingredient: 2% Di-syston (2,4-Dichlorophenyl phosphorothioate)
Inert Ingredients

Keep out of reach of children.

WARNING

May be fatal if swallowed, inhaled or absorbed through skin.

SEE TOP PANEL FOR PRECAUTIONARY STATEMENTS

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with label warnings and directions.

Do not use on food crops. Break cartridge on score line only when necessary and only when wearing rubber gloves. Never place more than one Systemic Insecticide Cartridge in chamber when using alone or with Fertilizer Cartridges.

Use Systemic Insecticide Cartridges alone or with ROSS Fertilizer Cartridges. Make first application in early spring when new growth appears. Repeat applications every six weeks or as necessary

through mid-summer. Using the ROSS Root Feeder connected to a garden hose, treat plants up to three feet high or wide with one cartridge. Treat with 1/2 additional cartridge for every foot above. Example: a 6-ft. tree needs 2 cartridges, a 12-ft. tree needs 3 cartridges. Plan ahead to evenly dispense dosage in all outermost branches.

Use a gentle flow of water.

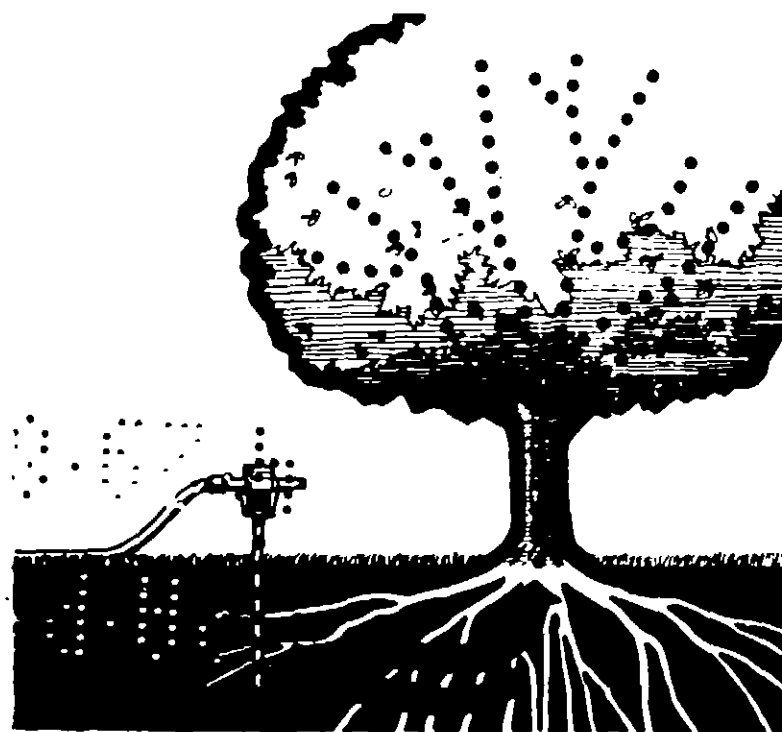
TREES, EVERGREEN TREES: Insert feeder tube into soil zone (under outer branches) to full depth and dispense dosage.

ROSES, SHRUBS, EVERGREEN SHRUBS: Insert feeder tube up to 12 to 14 inches in ground and dispense cartridge dosage. For shallow-rooted plants, do not insert as deep but never less than six inches.

anything by mouth to an unconscious person.
 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 water.
 IF IN EYES: Flush eyes with plenty of water. Call a physician immediately.
NOTE TO PHYSICIAN
 This product contains an organic phosphate insecticide which is a cholinesterase inhibitor. If symptoms of cholinesterase inhibition are present, atropine sulfate is antidotal. 2-PAM is also antidotal and may be used in conjunction with atropine.
ENVIRONMENTAL HAZARDS
 Toxic to fish, birds and other wildlife. Do not contaminate water, food or feed. Avoid contamination of public and private water supplies by using anti-backflow siphonage equipment... a standard feature of the ROSS Root Feeder.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if swallowed, inhaled or absorbed through skin. Avoid swallowing, contact with skin, eyes and clothing. Wear rubber gloves when handling cartridges. Do not breathe fumes or dust. Wash hands, arms and face thoroughly with soap and warm water before eating or smoking. Wash all contaminated clothing with soap and hot water before re-wearing. Keep children and pets away from treated area until completely dry.
STATEMENT OF PRACTICAL TREATMENT
IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give



ROSS Systemic Insecticide Root Feeder Cartridges

ROSS Systemic Insecticide Root Feeder Cartridges are specially formulated to protect trees, shrubs, evergreens and roses against sucking and mining insects. The ROSS Root Feeder delivers insecticide in solution directly to the root zone, providing a systemic action that protects plants from within.

Use as directed to control aphids (plant lice), birch leaf miners, holly leaf miners, lace bugs, leafhoppers, mimosa webworms, pin tip moths, spider mites, thrips and whiteflies.

Notice: This package is to be sold as a unit, and the contents within may not be sold separately

STORAGE AND DISPOSAL
 Do not contaminate water or food or feed by storage or disposal. Store unused cartridges in original packaging. Always replace cap on vial after opening. DO NOT REUSE EMPTY VIALS FOR ANY PURPOSE. WRAP VIALS AND PUT IN TRASH COLLECTION.

ROSS DANIELS, INC. 1720 Fuller Road PO Box 65430 West Des Moines, Iowa 50265
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