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APR 27 1987

Mr. Henry Pratt
120 Clinton Place
Hackensack, NJ 07601

Dear Mr. Pratt:

Subject: Amendment - Disulfoton Reregistration Standard Followup
Rose, Flower, Shrub Food With Systemic Insecticide Di-Syston
EPA Registration No. 11849-35
Your Letter Dated September 12, 1986

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Delete the word "Listed" as used in "Listed Insects." This statement should read ". . . Against Insects As Listed In The Directions For Use."
2. The commonly accepted name "Disulfoton" should precede the revised chemical name "O,O-diethyl S-[2-(ethylthio)ethyl] phosphorodithioate" as shown on the front label.
3. Please revise the Statement of Practical Treatment unless your toxicological data suggest otherwise.

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 a finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

92725: I. Shell: LR-11: KENCO: 4/15/87: 4/24/87: PAR: VO: EK: BJP

CONCURRENCES

SYMBOL	ORIGINATOR						
SURNAME							
DATE							

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 if irritation persists.

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.

4. Starting with the paragraph "This product is a scientifically prepared . . ." and ending with ". . . amounts of plant food for vigorous growth" should become part of the "Directions For Use" section. Somewhere within this text we suggest the use of the word "granular." This would be beneficial in describing the type of product. In addition, we assume you have data to support your "4-week, all-weather protection" and "4- to 6-week" claims.
5. We suggest that the "Guaranteed Fertilizer Analysis" and associated wording be relocated to immediately follow the ingredients statement on the front label.
6. The subheading "HAZARDS TO HUMANS AND DOMESTIC ANIMALS" should immediately follow the heading "PRECAUTIONARY STATEMENTS" on a separate line.
7. There is a typo with the word "run-off."
8. As it stands it is not clear which pests are controlled nor is it clear as to the location of that list of pests.
9. Please revise the usage of the ".24 oz." It would be quite difficult if not impossible for a homeowner to measure such an amount.

- 10. Revise the pesticide disposal statement to read "Securely wrap original container in several layers of newspaper and discard in trash." In addition, revise the container disposal statement to read "Do not reuse container. Discard in trash."
- 11. Delete the rotational crop restriction. This restriction pertains to commercial products used on agricultural sites.

In addition to the label comments, a review of other information submitted in connection with the Disulfoton Registration Standard under FIFRA reveals the following changes must be made.

- 1. Please provide the upper and lower certified limits based upon the pure active ingredients rather than the technical or concentrate. This will require the resubmission of a revised Confidential Statement of Formula (copy enclosed).
- 2. Submit a 1-year storage and stability study. The formulated product must be analyzed for its active ingredient at time zero and during a year of storage.

Note: For this study you cannot reference the concentrate you are using to formulate your product.

- 3. Please provide the odor associated with this product (in common terms).

The Disulfoton Toxicological Data (Table C Acute Toxicology Data) submitted by the manufacturer in support of your product is still under review. Please note that once these reviews are complete, additional label changes may be necessary if the data warrant restrictive use classification.

Submit five (5) 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 yours,

George T. LaRocca
 Product Manager (15)
 Insecticide-Rodenticide Branch
 Registration Division (TS-767C)

Enclosures

NOTE: For future reference the chemistry data that was submitted for this product has been assigned EPA Accession No. 264982.

ROSE, FLOWER AND SHRUB FOOD WITH SYSTEMIC INSECTICIDE CONTAINING DI-SYSTON

Plant Food With Systemic Insecticide Protection Against
Listed Insects

ACTIVE INGREDIENT:

O,O-Diethyl S-[2-(ethyl) phosphorodithioate].....1%

INERT INGREDIENTS.....99%

100%

KEEP OUT OF REACH OF CHILDREN (12 pt. type)

WARNING (18 pt. type)

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching finger to back of throat. Call a physician immediately. Do not give anything by mouth or induce vomiting when person is unconscious.

IF INHALED: Remove to uncontaminated area.

IF IN EYES: Flush with plenty of water and get medical attention.

IF ON SKIN: Remove contaminated clothing and immediately wash skin with soap and water. Launder clothing before reusing.

NOTE TO PHYSICIAN: If symptoms of cholinesterase inhibition are present, Atropine Sulphate, administered by injection, is antidotal. 2-PAM is also antidotal and may be administered with Atropine.

See back Panel for additional precautionary statements.

EPA REG. NO. 11849-35

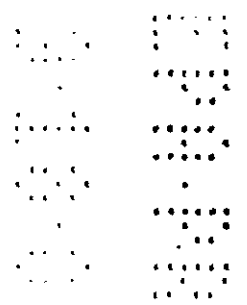
EPA EST NO. 44616-MO-1

Net Weight- 2 lbs.

ACCEPTED FOR REGISTRATION

APR 27 1987

11849-35



BACK PANEL

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL WARNINGS AND DIRECTIONS

This product is a scientifically prepared plant food especially formulated for rose feeding combined with a highly effective systemic insecticide. When used as directed kills the following insects on roses and other shrubs and flowers. Aphids (plant lice), Birch leaf miner, Holly leaf miner, Lace bug, Leafhoppers, Mimosa webworm, Pine tip moth, Spider mites, Thrips, Whiteflies. Gives 4 week all weather protection.

In addition to control of insects for 4 to 6 weeks, this product provides your roses with the adequate amounts of plant food for vigorous growth.

GUARANTEED FERTILIZER ANALYSIS

Total Nitrogen (N)	8%
5.6% Ammoniacal Nitrogen	
1.1% Urea Nitrogen	
1.3% Water Insoluble Nitrogen	
Available Phosphoric Acid (P ₂ O ₅)	12%
Soluble Potash (K ₂ O)	4%
Calcium (Ca)	10.0%
Magnesium (Mg)	1.0%
0.5% Water Soluble Mg	
Sulfur (S) as Combined	9.5%
Boron (B)	0.02%
Iron (Fe)	0.4%
Manganese (Mn)	0.05%
Molybdenum (Mo)	0.0006%
Zinc (Zn)	0.05%
Primary Nutrients from Urea, Ureaforn, Ammonium Sulfate, Ammoniated Superphosphate, Ammonium Phosphate and Muriate of Potash.	
Secondary and Trace Nutrients from Superphosphate, Magnesium Oxide, Magnesium Sulfate, Ammonium Sulfate, Iron Sulfate and Fritted Trace Elements.	
Chlorine (Cl) max	3.1%
Potential Acidity 600 lbs. Calcium Carbonate Equivalent per ton 397-1001	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: WARNING: May be fatal if swallowed. May be absorbed through the skin. Do not breathe dust. Do not get on skin, eyes or clothing. Wear rubber gloves when applying this product. Keep pets and children off treated area until material has been worked into the soil. Do not make Broadcast applications to lawns. Food utensils, such as teaspoon or measuring cup should not be used for food purposes after using to measure this or any insecticide.

ENVIRONMENTAL HAZARD: This product is toxic to fish and wildlife. Do not apply directly to water or wetlands. Drip or run-off 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. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not plant any food or feed crop in rotation after a field treatment with disulfoton unless it is a registered use for disulfoton found on this label.

ROSE, FLOWER AND SHRUB
FOOD WITH SYSTEMIC INSECTICIDE CONTAINING
DI-SYSTON

WHEN TO USE: Apply when plants have about 1 inch of new growth in the spring and at 6 week intervals through the summer. This product will provide the proper amount of plant nutrients to maintain strong, vigorous plants. Each application will give at least 4 to 6 weeks control of the pests listed above. PREPLANT TREATMENT TO FLOWERS, SHRUBS AND TREES: Apply evenly to soil bed and incorporate into top 1-3 inches of soil. Apply 2 pounds per each 100 sq. ft. (5 x 20 ft.) of bed area. Plant in usual manner. Water thoroughly. Do not apply additional fertilizer for about 6 weeks.

ON ESTABLISHED ROSES AND PLANTS: Spread 1/2 cup (5 level Tbsp.) evenly around the base of each plant and incorporate into topsoil. Water to accelerate entry into the plants.

WHEN PLANTING NEW BUSHES: Place 2 1/2 level Tbsp. in the transplant hole with the soil as you fill. Mix additional 2 1/2 level Tbsp. in the top 1-2 inches of soil. Water thoroughly. Do not apply additional fertilizer for about 6 weeks.

ON ORNAMENTAL SHRUBS: Apply 1/2 cup (4 oz.) for each foot of shrub height (2 cupfuls for a 3-foot high shrub. Distribute the required amount evenly from the base to the drip line on all sides of the plant. Work into the top 1-2 inches of soil. Water thoroughly. Apply .24 oz. per inch of tree trunk diameter. Work into top 1-2 inches of soil and repeat at 22 - 48 day intervals.

ON POTTED PLANTS: Apply 2 level tsp. per 6 inch pot by punching a number of small holes into the pot soil with a pencil. Pour granules into the holes and thoroughly water the plants. INDOOR PLANTS MUST HAVE A SAUCER TRAY RECEPTACLE BENEATH THE POT CONTAINER WHICH MAKES POT DRAINAGE WATER INACCESSIBLE TO CHILDREN AND PETS

IN CASE OF SPILLAGE, USE A TROWEL OR SHOVEL TO PICK UP AND PUT INTO PROPER PLACE IN PLANTINGS.

USE THIS PRODUCT ONLY IN ACCORDANCE WITH LABEL DIRECTIONS.
DO NOT APPLY AN OVERDOSE, AS PLANT INJURY MAY RESULT. -

STORAGE AND DISPOSAL

STORAGE: Store unused material, in original, closed container only, in a cool, dry, locked storage area out of reach of children and animals. Keep container tightly closed. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Material that cannot be used according to label instructions, must be disposed of according to applicable Federal, State or Local procedures.

CONTAINER DISPOSAL. Do not reuse empty container. Securely wrap in several layers of newspaper and discard in trash.

WARRANTY: Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured for:
InterChem Inc.
Alton, Iowa 51003