Pm 19 # 41: "- "

**APR** 8 1991

656 3556408

Ms. Ronnie Amburgey International Spike, Inc. 817 E. Third Street Lexington, KY 40505

Dear Ms. Amburgey:

Subject: Reregistration of Products Containing Disulfoton
Fertilizer/Insecticide Spikes for Roses
EPA Registration No. 46260-2
Fertilizer/Insecticide Spikes for Young Trees
EPA Registration No. 46260-10
Fertilizer/Insecticide Spikes for Evergreen Shrubs
EPA Registration No. 46260-11
Fertilizer/Insecticide Spikes for Beautiful Trees
EPA Registration No. 46260-12
Fertilizer/Insecticide Spikes for Evergreen Trees

PPA Registration No. 46260-13
Fertilizer/Insecticide Spikes for Flowering Shrubs
EPA Registration No. 46260-14
Your Applications Dated June 19, July 23, and
August 7, 1986 and May 15, 1987

The amendment 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 indicated below prior to release for shipment of product bearing the amended labeling.

1. Change the Note To Physician to read as follows:

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.

- 2. Update the Environmental Hazards by changing "by cleaning of equipment or disposal of wastes" to "when disposing of equipment wash waters."
- 3. Make the following changes on the labels ingredients statements:
  - a) The word "Disulfoton" should precede the chemical name.
  - b) Delete "(By Weight)"

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- c) Change "Active Ingredients" to the singular.
- d) The word "Total" should precede "100%."

The following comments deal with the chemistry of the products.

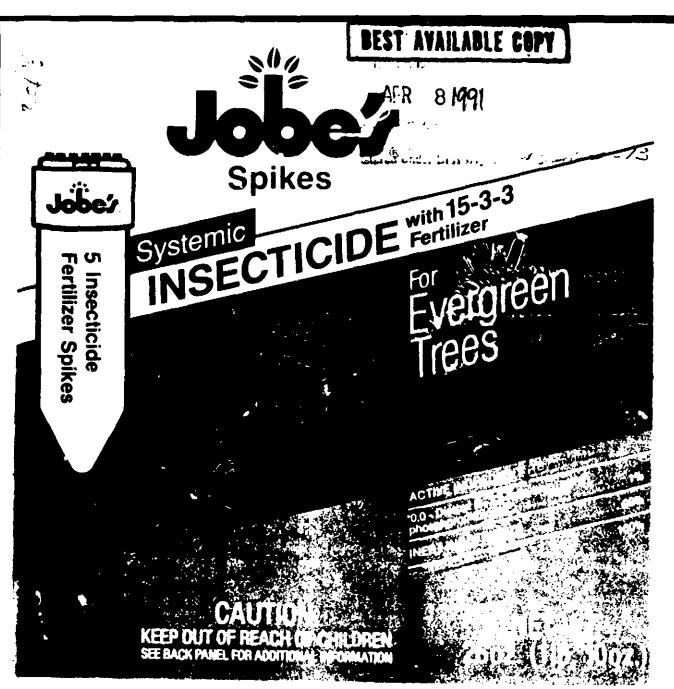
- 1. Provide the upper and lower certified limits based on the pure active ingredient rather than the technical or concentrate. Note that the lower limit of the active must not fall below the label claim.
- 2. The upper and lower certified limits are listed in the wrong columns.
- 3. Re-calculate the percent by weight values. There are several errors based on the amounts of each component divided by the total batch weight.

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,

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





## Insecticio for Everg

Guaranteed Fertilizer Analysis Total Nitrogen (N)\*

Available Phosphoric Acid (P.O.)\* Soluble Polash (K.O)\*

Soluble Polash (K. O)\*
Derived from American in Lighter (Lighter
Chicare Consistence transitions)
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Jobe's \* Insecticide Fertilizer Spikes; special nutrient form valides great the absorbed by the roots and carcillate the Leal Miners, Leal Hoppers, Whitelies, Pine Tip Moth, Phosphorus for roll grown and Polassium for a sprays which are applied to the foliage, Jobe's Spike

• Protects against insects a

Systemic insecticide work

Premeasured dosage of b

Easy to use — No mixing,

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If Tree Trunk Diameter is (inches)	1-2	3
Use This Many Spikes	2	_ 3

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