



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Bill Washburn
Regulatory Affairs Specialist
Micro Flo Company
530 Oak Court Drive, Suite 100
Memphis, TN 38117

AUG 5 2004

Subject: Ethephon 3.9% H&G
EPA Reg. No. 51036-305
Amendment dated July 9, 2004

Dear Mr Washburn:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. In the First Aid section, in the second line of the instructions for "If in eyes", remove the word "contaminated"
2. In the third line of the paragraph following the heading "Hazards to Humans and Domestic Animals", change "...chemical resistant gloves (such as nitrile....)" to "...chemical resistant gloves made of any waterproof material (such as nitrile....)"
3. In the sections following the heading "Environmental Hazards":
 - a. Change the first paragraph from "Do not apply directly to water" to "Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters."
 - b. In the third paragraph, change "sprays" to "spray"
4. In the section "Storage and Disposal", change the subheader "Storage" to "Pesticide Storage"
5. On page three, delete the first three sections (Home garden tomato ripening, Undesirable fruit elimination, and Mistletoe shoot removal) as these duplicate instructions in following sections.


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Ethephon 3.9% H&G
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6. In the section "Conditions of Sale and Warranty", the statement "IN NO CASE SHALL MICRO FLO OR THE SELLER BE LIABLE FOR" is overly broad. The label must make clear that the disclaimer is the registrant's or manufacturer's warranty disclaimer and not EPA's by using such statements as "To the fullest extent permitted by law, neither Micro Flo nor the seller shall be liable for...." or "It is the intention of Micro Flo that".

One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

**MICRO FLO
ETHEPHON 3.9% H&G**

For use only on plants grown for aesthetic purposes or climatic modification and being grown at home or in ornamental gardens or parks, or on golf courses or lawns and grounds.

For use on ornamentals for removal of nuisance fruit from trees and shrubs, for earlier ripening of home garden tomatoes, for the removal of dwarf mistletoe shoots in ornamental conifers, and for removal of leafy mistletoe shoots in ornamental deciduous trees.

ACTIVE INGREDIENT:

Ethephon: [(2-chloroethyl) phosphonic acid]* 3.9%

INERT INGREDIENTS: 96.1%

TOTAL: 100.0%

*This product contains 0.33 lbs. ethephon per gallon

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contaminated contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
IF ON SKIN:	<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.
HOT LINE	
Have the product container or label with you when calling a poison center or doctor, or going for treatment. You may also contact 1-800-832-4357 for emergency medical treatment information.	
NOTE TO PHYSICIAN: Treat symptomatically. Consideration should be given to the possibility that overexposure to materials other than this product may have occurred. No specific antidote is available. Probable mucosal damage may contraindicate the use of gastric lavage.	

See Additional Precautions on Side (Back) Panel

NET CONTENTS: _____
AD xxxxxx

EPA Reg. No. 51036-305
EPA Est. No. 51036-GA-001

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
AUG 5 2004**

Manufactured By:
**MICRO FLO COMPANY LLC
P.O. BOX 772099
MEMPHIS, TN 38117**

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

51036-305

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse. Wear long-sleeved shirt and long pants, socks and shoes, and chemical resistant gloves (such as nitrile, butyl, and/or barrier laminate).

ADDITIONAL EMERGENCY TELEPHONE NUMBERS:

(800) 424-9300 CHEMTREC (transportation and spills)
(800) 832-HELP (4357) Human Health
(800) 345-4735 ASPCA (animal health)

USER SAFETY RECOMMENDATIONS

Users should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Do not allow people or pets to touch treated plants until the sprays have dried.

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

Avoid spray drift to nearby plants as this product may cause temporary modifications in plant growth. Do not contaminate water used for irrigation or domestic purposes.

Prolonged exposure to sprays deposits can damage acrylic plastics, certain paints and metals. Remove automobiles and other vehicles from the treatment area prior to application to prevent spray deposits from falling on vehicles and potentially damaging finishes. Rinse acrylic plastic materials and painted surfaces exposed to inadvertent spray deposits using soap and water within an hour after exposure.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label before using this product. Do not apply this product in a way that will contact workers or other persons, either directly or through drift.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container secure from children and domestic animals. In case of spill, absorb liquid with inert absorbent such as cat litter. Rinse contaminated area with water.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration or if allowed by state and local authorities, by open burning. If container is burned, stay out smoke.

GENERAL INFORMATION

Apply ETHEPHON 3.9% H&G spray solution within 4 hours after mixing. Mix only the amount of spray you plan to use immediately. Do NOT save unused diluted spray solutions, as they will not be as effective as fresh solutions.

Temporary growth inhibition resulting from shortened internodes may be observed.

HOME GARDEN TOMATO RIPENING

ETHEPHON 3.9% H&G can be used as an overall, foliar spray to concentrate and accelerate tomato ripening. Applied at the end of the growing season, ETHEPHON 3.9% H&G will hasten ripening of mature green tomatoes and allow harvesting of fruit before frost.

UNDESIRABLE FRUIT ELIMINATION

A foliar spray of ETHEPHON 3.9% H&G will reduce or eliminate undesirable fruit development on many ornamental trees such as:

Apple, Carob, Cottonwood, Crabapple, Elm, Flowering pear, Horse Chestnut, (Buckeye), Maple, Oak Olive, Pine, Sour Orange, Sweetgum, and Sycamore.

MISTLETOE SHOOT REMOVAL

A foliar spray of ETHEPHON 3.9% H&G will cause the abscission of Dwarf Mistletoe shoots in ornamental conifers and Leafy Mistletoe shoots in ornamental deciduous trees.

HOME GARDEN TOMATO PRODUCTION USE

ETHEPHON 3.9% H&G can be used as an overall, foliar spray to concentrate and accelerate tomato ripening. Apply ETHEPHON 3.9% H&G at the end of the growing season to hasten ripening of mature green tomatoes and allow harvesting of fruit before frost. ETHEPHON 3.9% H&G spray will be most effective on healthy plants. Harvest fruit at proper maturity, generally 14 to 21 days after treatment. Some defoliation or yellowing of foliage following treatment will be observed.

Do not harvest tomatoes for processing treated with ETHEPHON 3.9% H&G sooner than 14 days after the last application.

AMOUNTS TO USE: When treating several plants, mix 1 teaspoon of ETHEPHON 3.9% H&G in 3 fluid ounces (6 tablespoons) of water. When treating a larger number of plants, mix 1 3/4 fluid ounces (3 1/2 tablespoons) of ETHEPHON 3.9% H&G in 1 quart of water. Apply with a clean hand sprayer. Thoroughly wet all leaves and fruit.

FRUIT ELIMINATION

A foliar spray of ETHEPHON 3.9% H&G will reduce or eliminate undesirable fruit ornamental trees and shrubs such as:

Apple, Crabapple, Carob, Cottonwood, Elm, Flowering pear, Horse Chestnut (Buckeye), Maple, Oak, Olive, Pine, Sour Orange, Sweetgum, and Sycamore. Applications must be made before fruit set for best results.

When applied to plants, ETHEPHON 3.9% H&G readily enters the plant and breaks down to ethylene, a naturally occurring plant hormone. Ethylene production within the plant is stimulated by stress. For this reason it is important that plants being treated are not under stress from drought, high temperature, disease or other environmental stress conditions. Treating stressed plants can cause severe injury to the plant such as defoliation or leaf scorching. Injury from ETHEPHON 3.9% H&G usually does not kill the plant, but can render it unsightly.

Applications should be made at the flower bud to full bloom stage, prior to fruit set in spray volumes sufficient to wet, but not to runoff. Failure to wet bud/blooms thoroughly will cause incomplete fruit elimination. Spraying too much (until runoff) may cause some defoliation or other plant injury. Sprays applied too early or too late will be less effective and result in incomplete fruit elimination. The activity of ETHEPHON 3.9% H&G is linked to plant growth activity and is therefore slower acting when temperatures are low (60F) or very high (95F). Trees or shrubs should not be under stress when treated such as from drought, insect or diseases.

For most species, mix 3/4 to 1 quart of ETHEPHON 3.9% H&G in 10 gallons of water (750 to 1,000 ppm) and apply to thoroughly wet buds and blooms but not to runoff. Amount of spray used will depend on tree size.

Use the higher rate when temperatures are cool. Fruit elimination may not be satisfactory on small, red fruited varieties of crabapples. Some temporary leaf yellowing and leaf drop of older leaves may occur after treatment.

For sensitive species such as Carob: Mix ½ quart ETHEPHON 3.9% H&G in 10 gallons of water (500 ppm) and apply to thoroughly wet buds and blooms but not to runoff. Amount of spray used will depend on tree size. Some temporary leaf yellowing and drop of older leaves may occur after treatment.

ETHEPHON 3.9% H&G has not been tested on all varieties of trees or shrubs which may have undesirable fruit. If it is necessary treat plant species not listed above, a small portion of the plant using the lower rate of application to determine the effectiveness of the product and to evaluate plant injury.

NOTE: These recommendations are not intended to be used in commercial fruit production as a thinning agent.

DWARF MISTLETOE REMOVAL:

Use ETHEPHON 3.9% H&G as a foliar spray on ornamental conifers for removal of dwarf mistletoe shoots and seeds. Applications made in conjunction with silvicultural mistletoe management will prevent spread of the mistletoe parasite to other parts of the tree and to other trees. Mix 1 quart of ETHEPHON 3.9% H&G in 4 gallons of water (2700 ppm) and spray to "wet". When treating mistletoe in Douglas Fir, mix 1 pint of ETHEPHON 3.9% H&G in 4 gallons of water (1350 ppm). Application of higher rates on Douglas Fir may result in excessive needle drop. Use of a non-ionic surfactant at recommended rates may increase effectiveness. Treat any mistletoe regrowth before seed dispersal occurs. Mature needle drop that normally occurs in the fall may be hastened by the use of ETHEPHON 3.9% H&G.

LEAFY MISTLETOE REMOVAL:

Use ETHEPHON 3.9% H&G as a foliar spray on deciduous trees for removal of leafy mistletoe shoots and seeds. Make applications after fall leaf drop through midwinter. Mix 2 quarts of ETHEPHON 3.9% H&G in 4 gallons of water (5400 ppm). For effective removal all mistletoe shoots must be sprayed to "wet". Use of a non-ionic surfactant at recommended rates may increase effectiveness. Large mistletoe infections and mistletoe found in mesquite may be difficult to control with a single application and re-treatment may be necessary. Should regrowth of mistletoe occur, retreat prior to mistletoe seed dispersal during the labeled application window.

HOME SPRAY GUIDE Read Detailed Instructions in This Pamphlet First

APPLICATION	USE SITE	AMOUNT OF ETHEPHON 3.9%	AMOUNT OF WATER
Ripening	Tomato, Fall Season	1.75 fl. oz.	1 Quart
Fruit Elimination	Carob	1.5 fl. oz.	1 gal.
	Other Species	2.5 - 3.0 fl. oz.	1 gal.
Mistletoe Removal	Dwarf	8 fl. oz.	1 gal.
	Leafy	16 fl. oz.	1 gal.

Note: 1.0 fluid ounce = 2 tablespoons = 6 teaspoons

CONDITIONS OF SALE AND WARRANTY

The Directions For Use of this product reflects the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of MICRO FLO COMPANY LLC ("Micro Flo") or the Seller. All such risks shall be assumed by the Buyer. Micro Flo warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use, subject to the inherent risks, referred to above. MICRO FLO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL MICRO FLO OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. Micro Flo and the Seller offer this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative of Micro Flo Company LLC.