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IPRODIONE - THIOPHANAT	E METHYL COMBO	21			None Restricted	
5. Name and Address of Applicant (Include ZIP Code)		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)			
	_	(b)(l), my	(b)(l), my product is similar or identical in composition and labeling			
MICRO FLO COMPANY LLC	,	to:				
P.O. BOX 772099		EPA Reg	g. No		<u> </u>	
MEMPHIS, TN 38117						
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Notification - Explain below.			Other - Explain		MOA - 9 5004	
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40 CFR 152.46, this may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections						
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IPRODIONE/THIOPHANATE METHYL COMBO

Fungicide to prevent and control diseases on greenhouse, container and field grown ornamental plants. Prevents and controls turf diseases on tees, greens, fairways and similar turf areas.

Not for homeowner use. For use by individuals/firms licensed or registered by the state to apply ornamental or turf pest control products

ACTIVE INGREDIENTS:

Thiophanate-methyl: (dimethyl 4,4'-o-phenylenebis [3-thioallophanate])*	19.65%
Iprodione: 3-(3,5-dichlorophenyl)-N-isopropyl-2,4-dioxo-l-imidazolidinecarboxamide**	19.65%
OTHER INGREDIENTS:	60.70%
TOTAL:	100.00%

^{*}Equivalent to 1.87 pounds Thiophanate-methyl per gallon.

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

FIRST AID

IF IN EYES:

- 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.

IF ON SKIN OR CLOTHING:

- 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 SWALLOWED:

- 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 the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, perferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

EMERGENCY NUMBERS:

- Transportation or spill, call CHEMTREC 800-424-9300.
- Human health, call 800-832-HELP
- Animal health, call ASPCA at 800-345-4735.

EPA Reg. No. 51036-387

EPA Est. No. 51036-GA-001

1

NET CONTENTS: 2.5 gallons

Filename: Iprodione-Thiophanate-methyl Combo (387-061604)(Notif-102104).doc

^{**}Equivalent to 1.87 pounds Iprodione per gallon.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category

Mixers, loaders, others exposed to the concentrate and cleaners/repairers of equipment must wear:

- Long-sleeved shirt and long pants
- · Chemical-resistant gloves
- Chemical-resistant apron, and
- Chemical-resistant footwear plus socks

Applicators and other handlers must wear:

- · Coverall or long-sleeved shirt and long pants
- Chemical-resistant gloves
- · Chemical-resistant apron, and
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposures and
- Dust-mist filtering respirator or a NIOSH-approved respirator with any R, P or HE filter

Applicators using mechanical ground equipment must wear:

Long-sleeved shirt and long pants and shoes plus socks

Applicators using truck-mounted equipment with a handgun at the end of the hose (i.e., for commercial turfgrass or ornamental applications) and all other handlers not specified above must wear:

- · Long-sleeved shirt and long pants and shoes plus socks
- · Chemical-resistant gloves

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- 1. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- 2. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 3. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
- 4. Discard clothing or other materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

ENVIRONMENTAL HAZARDS

This chemical can contaminate surface waters through aerial and ground applications. Under some conditions, it may also have a high potential for runoff into surface water after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water areas not separated from adjacent surface waters with vegetated filter strips and areas overlaying tile drainage systems that drain surface water.

This product is toxic to fish and invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Cover, incorporate or clean up spills. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the Agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- 2. Chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton)
- 3. Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not allow people (other than the applicator) or pets on the treatment area during application.

Do not enter treatment areas until spray has dried.

CHEMIGATION GENERAL INSTRUCTIONS (For Non-Turf uses only)

INTRODUCTION

Pesticide labels contain directions for use which are necessary for effecting the purpose for which the product is intended and to protect health and the environment. The following information is intended to decrease environmental risks of pesticide contamination of ground water and will decrease direct human exposure to pesticide-treated irrigation water by providing appropriate directions for use.

Apply this product only through pressurized drench (flood), sprinkler (overhead), or drip (trickle) irrigation system. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

REQUIREMENTS FOR CHEMIGATION SYSTEMS CONNECTED TO PUBLIC WATER SYSTEMS

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, back flow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the flow outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional, normally closed solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

CHEMIGATION SYSTEM REQUIREMENTS

Systems utilizing a pressurized water and pesticide system must meet the following requirements:

The system must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional, normally closed solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

GENERAL INFORMATION

Pesticide supply tanks are recommended for the application of these products. See label instructions for dilution rates and timing of application. For emulsifiable concentrates, agitate prior to use.

Since the material is used in an injection proportioner the pesticide is to be applied continuously for the duration of the water application.

SPRAY PREPARATION

Remove scale, pesticide residues, and other foreign matter from chemical tank and entire injector system. Flush with clean water.

Prepare a suspension of IPRODIONE/THIOPHANATE METHYL COMBO in a mix tank. Fill the tank with ½ or ¾ the desired amount of water. Start mechanical or hydraulic agitation. Slowly add the amount of recommended IPRODIONE/THIOPHANATE METHYL COMBO and then the remaining volume of water.

GENERAL CHEMIGATION PRECAUTIONS

Do not apply in greenhouses when temperatures are in excess of 95°F.

Do not allow spray mixture to stand in the tank for longer than 12 hours.

Spray mixture must be agitated continuously during application.

Use a properly calibrated sprayer.

Except in cases of severe infestation, allow one week between applications of this and other control products. (This guideline can be relaxed where a severe insect or disease attack requires immediate treatment.)

For best results do not water treated areas within 24 hours of application.

Observe the handling of this product as noted in the Precautionary Section of the label.

Shake product container well before pouring in to spray tank.

INSTRUCTIONS FOR SPRINKLER (OVERHEAD) IRRIGATION

Observe the requirements in the System Requirements section.

Follow recommendations in the General Information and Spray Preparation sections.

Set the sprinkler system to deliver 0.1 to 0.25 inches of water per acre. Volumes of water higher than this may reduce efficacy. Start sprinkler and uniformly inject the suspension of IPRODIONE/THIOPHANATE METHYL COMBO into the irrigation water line so as to deliver the desired rate per acre. The suspension of IPRODIONE/THIOPHANATE METHYL COMBO should be injected with a positive displacement pump into the main line ahead of a right angle turn to insure adequate mixing.

Maintain continuous agitation in the mix tank during mixing and application to assure a uniform suspension.

Greater accuracy in calibration and distribution will be achieved by injecting larger volumes of a more dilute suspension per unit time.

Application of more than recommended quantities of irrigation water per acre may result in decreased product performance.

Do not apply when wind speed favors drift, when system connections or fittings leak, when nozzles do not provide uniform distribution or when lines containing product cannot be flushed and must be dismantled and drained. In a center pivot system, block the nozzle set nearest the well pivot injection unit to prevent spray being applied to this area.

Where sprinkler distributions do not overlap sufficiently, unacceptable disease control may result.

Allow sufficient time for pesticide to be flushed through all lines and all nozzles before turning off irrigation water.

IPRODIONE/THIOPHANATE METHYL COMBO may be applied in conjunction with chemically neutral liquid fertilizers. Application in conjunction with highly alkaline fertilizers, such as aqueous ammonia, may cause a degradation of the pesticide, resulting in reduced performance, should be avoided.

Check local restrictions and requirements regarding sprinkler irrigation application as they might vary from state to state.

NOTE: When treatment with IPRODIONE/THIOPHANATE METHYL COMBO has been completed, do not irrigate area for 24-48 hours to prevent washing the chemical off the crop.

PRESSURIZED DRENCH (FLOOD) SYSTEM

Observe the requirements in the System Requirements section.

Follow recommendations in the General Information and Spray Preparation sections.

Systems using a gravity flow pesticide dispensing system must meter the pesticide into the water at the head of the field and downstream of a hydraulic discontinuity such as a drop structure or weir box to decrease potential for water source contamination from back flow if water flow stops.

DRIP (TRICKLE) CHEMIGATION

Observe the requirements in the System Requirements section.

Follow recommendations in the General Information and Spray Preparation sections.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, clean, dry place. Do not store at temperatures exceeding 120° F or at temperatures below 32° F.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agencyy, or the Hazardous Waste reoresentative at the nearest EPA Regional Office for guidance.

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 or local authorities, by burning. If burned, stay out of smoke. Do not reuse empty container.

TURF APPLICATION

Prevents and controls the following diseases on the turf where they occur:

- Leaf spot/melting out (Drechslera spp./Bipolaris spp.)
- Dollar spot (including benzimidazole tolerant strains)
- Brown patch
- Pink snow mold (Washington, Oregon, California only)
- Anthracnose (on Poa annua)

MIXING INSTRUCTIONS

Shake product container well before pouring into spray tank.

Mix IPRODIONE/THIOPHANATE METHYL COMBO into the spray tank during filling, while maintaining agitation.

Use with 2-7 gallons of water per 1,000 sq. ft. for tees and greens.

Water requirement can be reduced to 1 gallon per 1,000 sq. ft. for larger turf areas.

Thoroughly rinse container and pour remaining contents into spray tank.

Do not combine IPRODIONE/THIOPHANATE METHYL COMBO in the spray tank with surfactants or other adjuvants.

APPLICATION DIRECTIONS

Apply with standard pressurized properly calibrated spray equipment.

Do not allow spray mixture to stand in the tank for longer than 12 hours.

Spray mixture should be agitated continuously during application.

To Prevent Disease: Treat turf at the NORMAL RATE when weather conditions are favorable for the development of disease. Repeat on a 14-21 day schedule.

To Control Mild Disease Infestations: Use the MEDIUM RATE and repeat on a 14 day schedule until the disease is brought under control, then treat at the NORMAL or MEDIUM RATE on a preventive schedule.

To Control Moderate to Severe Disease Infestations: Use the HEAVY RATE and repeat on a 14 day schedule until disease is brought under control, then treat at the NORMAL or MEDIUM RATE on a preventive schedule.

For best results do not water or mow treated areas within 24 hours of application.

TURF USE RATE TABLE

USE SITE	DISEASE PRESSURE	SINGLE APPLICATION RATE	MAXIMUM SEASONAL APPLICATION RATE	
1		Fl. oz. Product/1000 sq ft	Fl. oz. Product/1000 sq ft	
Non-residential turf areas	Light	1.0 - 2.0	16.0	
	Medium	2.0 - 3.0		
	Heavy	3.0 - 4.0		
Golf Courses -	Light	1.0 - 2.0	24.0	
Tees/greens/aprons	Medium	2.0 - 3.0		
	Heavy	3.0 - 4.0		
Golf Courses - Fairways	Light	1.0 - 2.0	8.0	
(except Florida)	Medium	2.0 - 3.0		
	Heavy	3.0 - 4.0		
Golf Courses - Fairways	Light	1.0 - 2.0		
(Florida only)	Medium	2.0 - 3.0	4.0	
only during overseeding	Heavy	3.0 - 4.0		

TURF RESTRICTIONS:

Use of this product at residential sites is prohibited.

Minimum 14-day Retreatment Interval

Not for use on turf being grown for sale or other commercial use as sod.

Do not apply with fixed wing or rotary aircraft.

Do not apply this product on turf through any type of irrigation system.

Except for use on golf courses, if applying this product adjacent to a water body such as a lake, reservoir, river, permanent stream, marsh or natural pond, estuary, or commercial fish pond, there must be at least a 25-foot vegetative buffer strip between the water body and the point of application.

For golf courses only, do not apply to turf cut higher than 1" on golf courses where water bodies are present.

Do not apply this product when wind direction is toward aquatic areas. Applications must be limited to no more than six a year.

Do not contaminate feed or foodstuffs. Do not graze treated areas. Do not feed clippings to livestock.

ORNAMENTAL APPLICATION

Do not apply to home orchards/fruit trees after fruit set.

Controls the following diseases on ornamentals:

Foliar

Aerial web blight Corynespora leaf spot Ovulinia Cylindrocladium (2) Alternaria leaf blight Phomopsis blight Didymellina leaf spot Anthracnose Powdery mildew Asochyta blight Diplodia tip blight Ramularia leaf spot Black spot (1) Entomosporium leaf spot Ray blight Rhizoctonia blight Botrytis blight Fusarium leaf spot Botrytis gray mold Helminthosporium leaf spot Scab Cercospora leaf spot Ink spot Septoria leaf spot

Drench (after transplants)

Alternaria leaf blight Fusarium root rot Sclerotinia stem, crown and Botrytis blight Fusarium stem rot root rot Cylindrocladium rot Ink spot Thielaviopsis rot Fusarium crown rot Rhizoctonia root rot

(1)Roses

(2)Not active on Cylindrocladium spathiphylli

For use on ornamental plants such as:

Ageratum Crape Myrtle Geranium Ajuga Crassula Gladiolus Almond-Ornamental Croton Gloxinia Alyssum Cyclamen** Gypsophila Hawthorn Andromeda Dahlia Aphelandra **Daffodils** Holly Artemesia **Danthus** Hoya Hydrangea Aster Delphinium Deutzia Impatiens* Azalea Boxwood Dianthus Iris Dieffenbachia Juniper Cactus Kalanchoe Calendula Dizygotheca Carnation Dogwood Lilies Cherry-Ornamental Dracena Lipstick Vine English Ivy (Aeschynanthus) Chrysanthemum* Episcia Marigold Cineraria Euonymous Monarda (Bee Balm) Coleus Palm Columbine Ficus Forsythia Pansy Conifers Coral Bells (Heuchera) Gazania Peach-Ornamental

Peperomia Periwinkle

Petunia*
Philodendron
Phlox

Pilea

Pine

Pittosporum Plum-Ornamental Poinsettia**

Poppy
Pothos*
Primrose
Privet
Protea
Pvracantha

Rhododendron Rose Rose Tree of China

Salvia
Schefflera
Snapdragon
Statice
Tree Ivy
Viburnum
Violet

Zinnia

Do not use IPRODIONE/THIOPHANATE METHYL COMBO on Spathiphyllum or New Guinea impatiens.

*Do not use IPRODIONE/THIOPHANATE METHYL COMBO as a drench on impatiens, pothos or petunias. Do not repeat high drench rate on chrysanthemums

**Special care should be taken when treating these plants in bloom and prior to sale since some residue may be noticeable on foliage.

<u>Foliar spray:</u> Apply sufficient amount to foliar runoff, when conditions are favorable for disease development. Mix ratio is 17-34 fl. oz. of IPRODIONE/THIOPHANATE METHYL COMBO in 100 gal of water. Repeat at 10-14 days. The maximum single application rate for ornamentals is 192 fl. oz. (one gallon and two quarts) per acre.

<u>Drench:</u> Mix 17-34 fl. oz. of IPRODIONE/THIOPHANATE METHYL COMBO in 100 gal of water and apply at 1-2 pints per square foot after transplanting plants into propagation beds or containers. Repeat at 2-4 week intervals during conditions favorable for disease development. The maximum single application rate for ornamentals is 1,536 fl. oz. (12 gallons) per acre.

Apply IPRODIONE/THIOPHANATE METHYL COMBO at lower rate (17-25 oz. per gal of water) as a preventative application or when disease pressure is low. During periods of moderate to heavy disease pressure or to use as a curative treatment, apply the higher rate (6-34 oz. per 100 gallons of water).

CONDITIONS OF SALE AND WARRANTY

The Directions For Use of this product reflect 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.

Manufactured by: MICRO FLO COMPANY LLC P O BOX 772099 MEMPHIS. TN 38117 October 21, 2004

NOTIFICATION NOV - 5 2004

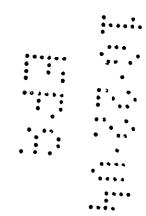
Ms. Mary Waller, PM 21
Document Processing Desk (NOTIF)
Office of Pesticide Programs – 7504C
U.S. Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 South Bell Street
Arlington, VA 22202

Subject

Iprodione - Thiophanate Methyl Combo

EPA Reg. No. 51036-387

Notification of Corrected and Alternate Spellings



Dear Ms. Waller.

It was brought to my attention that some of the ornamental plants listed in this label were either misspelled or was not the most common name for the plant. This notification is being submitted to correct those mistakes. The changes outlined below are highlighted on one copy of the enclosed label:

Page No.	Original Spelling	Corrected Spelling
9	<u>Diplo</u> dea	Diplodia
9	Gazanea	Cazania
9	Bee Palm	Bee Balm
10	Scheflera	Schefflera

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling of the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this may be in violation of EIERA and I may be subject to enforcement action and penalties undersections 12 and 14 of EIERA.

Please confirm your acceptance of this notification by stamping the extra copy of the enclosed letter and returning in the enclosed selfaddressed stamped envelope. Should you have any questions, please feel free to call me at 901-432-5118

Sincerely,

Bill Washburn

Regulatory Affairs Specialist

Der Washler