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Jackie DiMaggio
Valent U.S.A. Corporation
1333 N. California Blvd.
Walnut Creek, CA 94596-8025

Dear Ms. DiMaggio:

Subject: SUMAGIC Plant Growth Regulator
EPA Reg. No. 59639-37
Re: Labeling Amendments
Your submission dated April 29, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Please submit five (5) copies of your final printed labeling incorporating these changes before releasing your product for shipment. A stamped copy is enclosed for your records.

1. Under "Environmental Hazards" update your water statement to read "Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark."
2. You must include the following misuse statement directly following the "Directions for Use" heading: "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling."

Sincerely,

Cynthia Giles-Parker

Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (H7505C)

enclosure

| CONCURRENCES | | | | | | | |
|--------------|---------|--|--|--|--|--|--|
| SYMBOL | H7505C | | | | | | |
| IRNAME | COLE | | | | | | |
| DATE | 6/26/92 | | | | | | |

to 6 weeks after final pinch. Azalea cultivars may vary in their response to SUMAGIC. Treat a small number of plants to confirm appropriate rates for local conditions and specific cultivars.

Shorter Growing Cultivars (Gloria, Solitarius): Apply SUMAGIC as a foliar spray at 2.56 oz/gal (76 mgal, 10 ppm). If a second application is necessary, apply 1.28 to 2.56 oz/gal (38 to 76 mgal, 5 to 10 ppm) approximately 2 to 3 weeks after the initial application.

Taller Growing Cultivars (Prize): Apply SUMAGIC as a foliar spray at 2.56 to 3.84 oz/gal (76 to 114 mgal, 10 to 15 ppm). If a second application is necessary, apply 2.56 oz/gal (76 mgal, 10 ppm) approximately 2 to 3 weeks after the initial application.

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For use in Florida only. Apply SUMAGIC as a foliar spray at 5.12 oz/gal (151 mgal, 20 ppm) 4 to 8 weeks after the final pinch as a uniform spray at a volume of 15 qts. per 100 sq. ft. of bench area. If a second application is necessary, apply 2.56 to 3.84 oz/gal (76 to 114 mgal, 10 to 15 ppm) approximately 3 to 4 weeks after the initial application.

NOTE: Timing of applications will depend on cultivar, time of year, and growing conditions. Treat a small number of plants to confirm appropriate rates for local conditions and cultivars.

IMPORTANT NOTES

IMPORTANT: SUMAGIC is an extremely active plant growth regulator. Extreme care must be exercised in measuring and applying SUMAGIC. Excessive rates will result in severe growth retardation and possible adverse effects on plant quality, appearance and marketability. Avoid spray drift onto other plants.

Apply to well-watered, vigorously growing plants. Do not mix with pesticides, fertilizers or adjuvants. Do not apply SUMAGIC to any food crops. Do not reuse soil in plants treated with SUMAGIC.

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It is recommended that SUMAGIC be applied during morning or late afternoon hours or when plants are not under environmental stress.

SUMAGIC retards elongation almost immediately after application. Assessment of rate response for most species can be made within five to seven days after treatment. If desired results are not evident, reapplication or an increased rate may be warranted.

Differences in plant response to SUMAGIC due to plant surface area in relation to soil surface area are possible. Extreme temperatures can influence plant response to SUMAGIC.

Shake before using.

RATE CONVERSION TABLE

Conversion between ppm, ml/l, mgal, oz/gal

| PPM | ML/L | MGAL | FL OZ. GAL |
|-----|------|------|------------|
| 2 | 2 | 8 | 0.26 |
| 3 | 6 | 23 | 0.77 |
| 5 | 10 | 38 | 1.28 |
| 10 | 20 | 76 | 2.56 |
| 15 | 30 | 114 | 3.84 |
| 20 | 40 | 151 | 5.12 |
| 25 | 50 | 189 | 6.40 |
| 30 | 60 | 227 | 7.68 |
| 35 | 70 | 265 | 9.00 |
| 40 | 80 | 303 | 10.25 |
| 45 | 90 | 341 | 11.50 |
| 50 | 100 | 379 | 12.75 |
| 75 | 150 | 568 | 19.12 |

Do not apply under conditions involving possible drift to food, forage or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

STORAGE: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in cool, dry place. Protect from temperatures below 32°F. This product may freeze. If freezing should occur, thaw and shake gently to unify the product. Do not store diluted spray for help with any spill, leak, fire or exposure involving this material. Call day or night 1-800-457-2022.

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

CONTAINER DISPOSAL: Triple rinse (or equivalent). Do not reuse container. 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 burning. If burned, stay out of smoke.

IMPORTANT INFORMATION. READ BEFORE USING PRODUCT.

LIMITED WARRANTY: Valent U.S.A. Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for use under average conditions when used strictly in accordance with the directions on the labeling. Valent does not make nor authorize any agent or representative to make, any other warranty, guarantee or representation, express or implied, concerning this product. Specifically, NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE IS MADE. Critical and unforeseeable factors beyond Valent's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which product is applied, lack of complete control over the handling and application of this product, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit under average conditions for the uses stated on the labeling and even though label directions are followed. Buyer and user acknowledge and assume all risks and liability (except those assumed by Valent under 1. above) resulting from handling, storage, and use of the product. 3. Precautions stated on the labeling should be followed to avoid hazardous exposure to the product.



For Com...
Active In...
Incon...
Ingre...
(E)-1 + H...
(1,2,4-triaz...
Contains 0.06...
0.05 g/litre...
U.S. Pat. Nos...
SUMAGIC® -...
for unconzo...

KEEP OUT OF REACH OF CHILDREN. CAUTION.
SEE BACK PANEL FOR PRECAUTIONS.
Manufactured by Valent U.S.A. Corporation
Valent Creek
Form 219-B
EPA Reg. No.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with eyes. Wear protective clothing, long sleeved shirt, and long pants. Remove contaminated clothing and wash thoroughly before reuse. Use soap and water.

STATEMENT OF PRACTICAL TREATMENT: If in eyes, flush eyes with plenty of water for at least 15 minutes. If on skin, wash with plenty of soap and water. Seek medical attention if persists.

Note to Physicians: Emergency information: call 1-800-457-2022.

ENVIRONMENTAL HAZARDS: Do not apply directly to water bodies, streams, wetlands, or to areas adjacent to aquatic habitats. Do not dispose of equipment or containers.

DIRECTIONS FOR USE: This is a violation of Federal Law to use this pesticide in a manner inconsistent with its labeling.

READ ENTIRE LABEL AND PAMPHLET USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

REENTRY STATEMENT

Do not reenter treated areas until sprays have dried. SUMAGIC is a plant growth retardant on a wide variety of plants. It is a systemic herbicide. Apply according to the directions on the label. Reentry restrictions are dependent on the application rate. Except where noted, rates expressed are based on a spray volume of 2 qts. applied uniformly to 100 sq. ft. of bench area and indicate the amount of SUMAGIC per gallon final spray solution.

Reentry restrictions are influenced by cultivar and growth conditions such as growing media, water, and light. Reentry restrictions for growing house and greenhouse applications are based on the number of plants at the application site. Rate adjustments may be made to accommodate plant response. Sequential applications may be made as necessary.

DIRECTIONS

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

FOR COMMERCIAL GREENHOUSE USE AND FOR LATHHOUSE AND SHADEHOUSE USE (WHERE PLANTS ARE GROWN IN CONTAINERS) ONLY

This product has a potential to leach into groundwater or to runoff into surface water in Greenhouses, Lathhouses or Shadehouses with soil flooring of high porosity and low organic content. Do not apply directly to soil or to plants, pots in direct contact with soil.

POINSETTIA

FOLIAR SPRAY Growth Retardation: Apply SUMAGIC as a foliar spray when the breaks are 15 to 20 inches (about 10 to 14 days after pinch). Use rates listed below and apply uniformly at a spray volume of 2 qts. per 100 sq. ft. of bench area. Multiple applications of the lower rate may be applied as necessary. First time users of SUMAGIC should make single or sequential applications at the lowest recommended rate to determine optimum dose for specific cultivars under local conditions. Late season application (after short day initiation) may have negative effects on bract size, plant quality and marketability.

DO NOT APPLY SUMAGIC TO POINSETTIAS AFTER THE INITIATION OF SHORT DAYS

FLORIDA ONLY. DO NOT APPLY SUMAGIC TO POINSETTIAS AFTER OCTOBER 25

| Growing Region | Recommended Spray Concentration Rate Range |
|--------------------------|---|
| A: States except Florida | 0.64 to 2.56 oz/gal (Repeat as needed every 10 to 15 days) (2.5 to 10 ppm) |
| Florida | 2.56 to 3.84 oz/gal (Repeat as needed every 10 to 15 days) (76 to 114 mgal, 10 to 15 ppm) |

BEDDING PLANTS

FOLIAR SPRAY Growth Retardation: Apply SUMAGIC as a foliar spray as plant elongation begins (plant height approximately 2 to 4 inches). Timing may vary with species and the user should determine the appropriate growth stage for specific cultivars and environmental conditions. Use rates listed below and apply uniformly at a spray volume of 2 qts. per 100 sq. ft. of bench area. Multiple applications of lower rate may be applied as necessary. Cultivars within the same species may respond differently to a given rate of SUMAGIC. First time users of SUMAGIC should make single or sequential applications at the lowest recommended rate to determine optimum dose for specific cultivars under local conditions.

| Plant | Recommended Spray Concentration Rate Range (oz/gal) (ml/gal) (ppm) |
|--------------|--|
| Ageratum | 5.12 to 7.68 151 to 227 20 to 30 |
| Celosia | 2.56 to 5.12 76 to 151 10 to 20 |
| Coleus | 2.56 to 5.12 76 to 151 10 to 20 |
| Dahlia | 2.56 to 5.12 76 to 151 10 to 20 |
| Impatiens | 1.28 to 2.56 38 to 76 5 to 10 |
| Mangold** | 2.56 to 5.12 76 to 151 10 to 20 |
| Pansy | 0.26 to 1.52 8 to 46 1 to 6 |
| Petunia | 0.77 to 1.28 23 to 38 3 to 5 |
| Salvia | 6.4 to 12.79 189 to 379 25 to 50 |
| Snapdragon** | 2.56 to 3.84 76 to 114 10 to 15 |
| Viola | 6.49 to 12.79 189 to 379 25 to 50 |
| | 0.26 to 1.28 8 to 38 1 to 5 |

*Seed Propagated
**Multiple application may be necessary
***Multiple applications necessary

NOTE: Begonias are exceptionally sensitive to SUMAGIC. Extreme care should be exercised to avoid spray drift onto Begonia cultivars.

NOTE: Treat quarantine for

FOLIAR SPRAY: All rates are oz/gal. (76 to 114 mgal) shoots average 100-150 mm tall. Florida only.

SOIL DRENCH: All states except Florida. Apply 3 inch 0.06 oz/gal. 4 ft. oz. of applications. Florida only.

FOLIAR SPRAY: Apply SUMAGIC at 1.28 in a uniform area. Multiple applications necessary. NOTE: Chrysanthemum response to 80 ppm approx. Florida only.

General Directions of 15 qts. per

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vary if a given rate is applied at different spray volumes. Uniformity of spray is equally important. Except where noted, rates expressed are based on a spray volume of 2 qts. applied uniformly to 100 sq. ft. of bench area and indicate the amount of SUMAGIC per gallon of final spray solution.

Plant response to SUMAGIC is strongly influenced by cultural and environmental variables, such as growing media, water/fertilizer management, temperature, light, growing house composition, and other cultural practices. First time users of SUMAGIC should treat a limited number of plants at the lowest recommended rate. Rate adjustments may then be made according to plant response. Sequential applications of low rates may be made as necessary.

COPY B NOTE: Certain varieties such as Supjibi and Freedom are more sensitive to SUMAGIC than others and should be treated with the lowest recommended rates for each growing region.

COPY C **POINSETTIA TREES**

For use in Florida only:

Apply SUMAGIC as a drench at a solution concentration of 0.51 to 0.77 oz./gal. (15 to 23 ml/gal., 2 to 3 ppm) when breaks are 1.5 to 2.0 inches (about 10 to 14 days after the second pinching). Apply 8 fl. oz. of diluted solution to each pot.

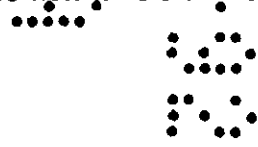
Do not apply SUMAGIC to Poinsettia Trees after October 25.

BEDDING PLANTS

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FOLIAR SPRAY

Growth Retardation: Apply SUMAGIC as a foliar spray as plant elongation begins (plant height approximately 2 to 4 inches). See exceptions for Periwinkle (*Vinca*), Pansy and Geranium. Timing may vary with species and the user should determine the appropriate growth stage for specific cultivars and environmental conditions. When applying to plants at the shortest growth stage (2 inches), use the lowest recommended rate. Use rates listed below and apply uniformly at a spray volume of 2 qts. per 100 sq. ft. of bench area. Multiple applications of lower rate may be applied as necessary. Cultivars within the same species may respond differently to a given rate of SUMAGIC.



First time users of SUMAGIC should make single or sequential applications at the lowest recommended rate to determine optimum dose for specific cultivars under local conditions.

| | | | | |
|---------------|---------------------------|---------------------|-------------------|-----------------|
| COPY D | Periwinkle (Vinca) | 0.26 to 0.77 | 8 to 23 | 1 to 3 |
| | Petunia** | 6.4 to 12.79 | 189 to 379 | 25 to 50 |
| | Salvia | 1.28 to 2.56 | 38 to 76 | 5 to 10 |

COPY E For optimum results on Periwinkle (Vinca) and Pansy, it is recommended that SUMAGIC not be applied until plants reach a height of 4 inches.

GERANIUMS

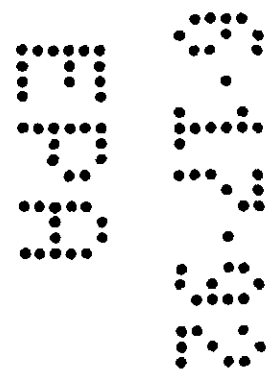
FOLIAR SPRAY

Growth Retardation: Seeded Geraniums - Apply SUMAGIC as a foliar spray when plant height is approximately 4 inches. Apply 0.52 to 1.04 oz./gal. (16 to 32 ml/gal., 2 to 4 ppm) as a uniform spray at a volume of 2 qts. per 100 sq. ft. of bench area.

Vegetatively Propagated Geraniums - Apply SUMAGIC as a foliar spray on an as-needed basis once the growth of cuttings begins (dependent on growth rate and cultivar). Apply 0.77 to 1.54 oz./gal. (23 to 46 ml/gal., 3 to 6 ppm) as a uniform spray at a volume of 2 qts. per 100 sq. ft. of bench area. Choice of rate is dependent on growth rate.

COPY F FOLIAR SPRAY

All states except Florida: Treat Easter Lilies with 2.56 to 6.4 oz./gal. (76 to 189 ml/gal., 10 to 25 ppm) SUMAGIC when shoots average 3 inches tall. Use a uniform spray volume of 2 qts. per 100 sq. ft. of bench area. If a second application is made, it should be applied when shoots average 6 inches tall.



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CHRYSANTHEMUMS

FOLIAR SPRAY

Apply SUMAGIC as a foliar spray when the length of the breaks is 1.5 to 2.0 inches (about 7 to 14 days after pinching). Make a uniform spray application at a volume of 2 qts. per 100 sq. ft. of bench area (except in Florida on medium and tall cultivars where 3 qts. per 100 sq. ft. is recommended). Multiple applications should be applied as necessary.

NOTE: Chrysanthemum cultivars vary widely in their response to SUMAGIC. Treat a small number of plants to confirm appropriate rates for local conditions and specific cultivars.

| Growing Region | Recommended Spray Concentration Rate Range |
|---------------------------|--|
| All states except Florida | 0.64 to 2.56 oz./gal. (19* to 76 ml/gal., 2.5 to 10 ppm). *Cooler growing climates should utilize the lower rate and make a second application if necessary. |
| Florida | 1.28 to 2.56 oz./gal. (38 to 76 ml/gal., 5 to 10 ppm). Apply at a 3 qts. per 100 sq. ft. volume for medium and tall cultivars. Repeat application as necessary. |

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HIBISCUS

For Use in Florida Only

General Directions: Use from 1.28 to 2.56 oz./gal. (38 to 76 ml/gal., 5 to 10 ppm) and apply as a uniform spray at a volume of 3 qts. per 100 sq. ft. of bench area. Multiple applications can be made as necessary.

COPY I

SUMAGIC activity is reduced when applied to media containing pine bark.

