UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

11 2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JAN 11 2008

Ms. Amy Dugger-Ronyak Regulatory Affairs Specialist SePRO Corporation 11550 North Meridian St, Suite 600 Carmel, IN 46032-4565

SUBJECT: Cutless 0.33G Landscape Growth Regulator EPA Reg. No. 67690-13 Your Submission Dated 2/21/07

Dear Ms. Dugger-Ronyak:

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable providing you submit one copy of a final printed label within 45 days from the date of this label which makes the following changes:

Page 1 – change tagline under product name from "Growth Suppression of Perennial Landscape Ornamental Plants" to "Growth Suppression of Outdoor Perennial Landscape Ornamental Plants".

Page 3 – under "General Information", change "Established Perennial Landscape Ornamentals" to "Established Outdoor Perennial Landscape Ornamentals".

Page 3 – in the middle of this page, delete the two words "Use Directions" and "Established Perennial Landscape Ornamentals" because these are redundant with prior wording.

Page 3 - In the "General Use Precautions" bullets, add two new bullets, "Not for use by homeowners", and "For plants not listed, the user should perform small trials to better target use rates".

Page 5 – In the "Inherent risks of Use" section, add "To the extent consistent with applicable law" in front of "All such risks...".

Page 6 – change tagline under product name from "Growth Suppression of Perennial Landscape Ornamental Plants" to "Growth Suppression of Outdoor Perennial Landscape

Ornamental Plants".

A copy of the Master Label stamped "Accepted with comments" is enclosed for your records. Please contact Bob Tomerlin of my staff at 703-305-0598 (tomerlin.bob@epa.gov) or me at 703-308-9443 (kish.tony@epa.gov) if you have any questions regarding this action.

Sincerely,

Tony Kish(

Product Manager (22) Fungicide Branch Registration Division (7505P)

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Enclosure

ACCEPTED with COMMENTS In EPA Letter Dated

Cutless* 0.33G 67690-13 [Front Label]

Sepf

Cutless* 0.33G Landscape Growth Regulator

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

A Systemic Growth Regulator for Growth Suppression of Perennial Landscape Ornamental Plants.

Active Ingredient:

flurprimidol: a-(1-methylethyl)-a-[4-(trifluoromethoxy)-	
phenyl]-5-pyrimidinemethanol	0.33%
Other Ingredients:	
Total	
Contains 0.0022 pound of active ingredient per pound of product	

Contains 0.0033 pound of active ingredient per pound of product.

Keep Out of Reach of Children CAUTION / PRECAUCIÓN

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

First Aid	
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 a poison control center or doctor.
	Do not give anything by mouth to an unconscious person.
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	Take off contaminated clothing.
clothing	 Rinse skin immediately with plenty of water for 15 – 20 minutes.
	Call a poison control center or doctor for treatment advice.
If inhaled	Move person to fresh air.
	 If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
	 Call a poison control center or doctor for further treatment advice.
treatment. In ca	act container or label with you when calling a poison control center or doctor, or going for ase of emergency endangering health or the environment involving this product, call 1-800-535-5053 .

Refer to inside of label booklet for additional precautionary information and Directions for Use, including Storage and Disposal.

Notice: Read the entire label before using. Use only according to label directions. Before buying or using this product, read "Warranty Disclaimer", "Inherent Risks of Use" and "Limitation of Remedies" inside label booklet.

For additional product information, visit us at www.sepro.com

Specialty Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 67690-13	EPA Est. No
FPL011108	SPC

SePRO Corporation 11550 N. Meridian St., Ste. 600, Carmel, IN 46032 U.S.A.

Landscape Growth Regulator

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children CAUTION / PRECAUCIÓN

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Harmful if swallowed, inhaled or absorbed through the skin. Causes eye irritation. Avoid breathing dust or spray mist and contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment (PPE)

It is recommended that applicators and other handlers wear:

- Eye protection such as goggles or face shield;
- Long-sleeved shirt and long pants or coveralls;
- Chemical-resistant gloves; and
- Shoes plus socks

First Aid	
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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
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.
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treatment. In ca	ict container or label with you when calling a poison control center or doctor, or going for ase of emergency endangering health or the environment involving this product, call 1-800-535-5053 .

Environmental Hazards

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 cleaning equipment or disposing of equipment washwaters.

DIRECTIONS FOR USE

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

Read all directions for use before applying this product.

GENERAL INFORMATION

> Established Perennial Landscape Ornamentals

Cutless 0.33G is a systemic landscape growth regulator which suppresses terminal growth in established woody ornamental plants and perennial ground covers. Treated plants require less trimming and exhibit a more compact growth form. Growth suppression is achieved by suppression of gibberellic acid biosynthesis resulting in reduced internode elongation in terminal shoot growth. Smaller leaves and intensified greening occur in some species. Cutless 0.33G is absorbed by root interception from soil and is translocated to growing stems and leaves within water conducting tissues. Movement of Cutless 0.33G in plants occurs in response to transpiration water loss.

NOTE: Non-target plants with roots which extend into Cutless 0.33G treated areas may exhibit growth regulation. **Antidote:** Gibberellic acid may be applied as an antidote to stimulate terminal shoot growth of over regulated plants.

Time required for onset of growth suppression may vary from 2 to 8 weeks, for herbaceous and woody species, respectively, depending on the rate of foliage water loss and mass and height of woody stems. Duration of growth suppression ranges from 2 to 6 months, depending upon plant species, environmental factors, and soil type. Frequent trimming and seasonal loss of leaves encourage more rapid dissipation of growth regulator effects in treated plants. In general, growth suppression will be of longer duration in species with larger mass of woody tissue. Cutless 0.33G may not be effective on certain conifers or other species which contain high concentrations of oils, resins and latex materials in plant tissues.

Possible Benefits of Cutless 0.33G Applications to Established Perennial Landscape Ornamentals:

- Shoot growth suppression of landscape ornamentals resulting in decreased pruning frequency.
- Darker green foliage.
- Increased plant density or compact growth habit.
- Improved water use efficiency resulting in pre-drought stress conditioning.
- Potential for enhanced flowering in some plant species.

USE DIRECTIONS

> Established Perennial Landscape Ornamentals

General Use Precautions for Established Perennial Landscape Ornamentals:

- Use Cutless 0.33G only on plantings that are well-established and in vigorous growth condition.
- Cutless 0.33G is not suitable for treatment of ornamental trees.
- Do not use Cutless 0.33G on plants from which fruits, nuts or other commodities may be produced for human consumption.
- Do not apply to annual bedding plants.
- Avoid application when weather conditions favor movement of granules from target area.
- Do not apply more than 3.0 lbs ai/A/year or 909 lbs/A/year of Cutless 0.33G.

Application:

Apply Cutless 0.33G uniformly over the treatment area with a rotary-type, gravity-fed, or airflow driven spreader. Cutless 0.33G may be applied over the top of low-growing woody plants and perennial ground covers. For larger plantings Cutless 0.33G should be applied uniformly under the dripline. Apply when rainfall is expected within a few days or apply a minimum of 0.5 inch of sprinkler irrigation to move Cutless 0.33G into the root zone. Avoid runoff and possible product movement during the initial irrigation after application. Periodic rainfall or irrigation is needed to maintain uniform growth regulation activity. Avoid irrigation in excess of plant growth requirements.

Application Timing:

Apply Cutless 0.33G as needed for shoot growth suppression of landscape ornamentals. Apply Cutless 0.33G in conjunction with pruning or trimming of landscape ornamentals. For best results, shape or prune plants on the day of Cutless 0.33G application or 1 to 5 days before or after application. For extremely aggressive and vigorous landscape ornamentals, pruning or shaping should occur 5 to 7 days following application. Frequent trimming and loss of leaves encourages more rapid dissipation of growth regulator effects in treated plants. Apply repeat treatments every 2 to 6 months.

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Application Rates:

The amount of Cutless 0.33G required for an optimum growth regulation response is dependent upon the height and mass of woody stems, foliage volume, sunlight exposure, soil texture, rainfall and temperature conditions, and species tolerance. Cultural practices such as frequency of irrigation, fertilization and timing of application may also affect the response to Cutless 0.33G treatment. Because of these factors, plant response to a given application rate of Cutless 0.33G may vary according to local conditions. Users should establish specific application rates for different species in small scale treatments under actual use conditions. Refer to Table 1, for rate recommendations for established perennial landscape ornamentals.

For spot treatment applications to landscape ornamentals contained in beds less than one acre (43,560 ft²), DO NOT exceed 3 lbs ai/A/year or 909 lbs/A/year over the entire acre containing the spot treatments.

Starting application rates for Cutless 0.33G treatments are as follows:

- Perennial non-woody ground covers and herbaceous landscape ornamentals 3.5 to 7.0 pounds per 1000 ft² or 0.5 to 1.0 pounds active ingredient per acre.
 - o **Examples include:** Mexican Petunia, Lantana, Asiatic Jasmine, Plumbago
- Perennial woody ground covers and woody ornamentals 7.0 to 20.9 pounds per 1000 ft² or 1.0 to 3.0 pounds active ingredient per acre, depending on the height and mass of woody tissue present. Generally, Cutless 0.33G rate requirement will increase as plant height and mass of woody tissue increase.
 - Examples include: Ficus, Ligustrum, Viburnum, Eleangus, Holly, Jasmine, Spirea, Ground Ivy, Vinca Minor, Hibiscus, Euonymus, Boxwood, Firebush

Determining the Amount of Cutless 0.33G Required:

Determine the area to be treated in acres, thousands (1000's) of square feet or hundreds (100's) of square feet. Choose an application rate appropriate for the type of vegetation to be treated and desired level of growth suppression. To determine the amount of Cutless 0.33G required, multiply the area to be treated (in acres, 100's or 1000's of square feet) times the required amount Cutless 0.33G per unit area (see Cutless 0.33G application rate table) which corresponds to the desired rate.

Example: If the area to be treated is 450 ft² (4.5 100's of square feet), and the desired application rate is 7 lbs/1000 ft² (1.0 lb a.i./A); multiply 4.5 X 11.2 oz./100 ft² = 50.4 oz or 3.15 pounds.

TABLE 1 Cutless 0.33G Rate Recommendations for Established Perennial Landscape Ornamentals -- Cutless 0.33G --**Active Ingredient** Landscape Ornamental¹ (pounds/1000 ft²) (ounces/100 ft²) (pounds/acre) Perennial non-woody ground 3.5 5.6 0.50 covers and Herbaceous 7.0 Landscape Ornamentals 11.1 1.00 7.0 1.00 11.1 10.4 16.8 1.50 Perennial woody ground covers and Woody Ornamental Shrubs 13.9 22.3 2.00 and Hedges 17.4 2.50 27.8 20.9 33.4 3.00

¹ **NOTICE TO USERS:** The rates indicated may need to be adjusted to achieve the desired level of growth regulation. The rates recommended above are rate ranges of Cutless 0.33G for growth regulation of established perennial landscape ornamental and should be used only as guidelines. The amount of Cutless 0.33G required for optimum growth regulation response is dependent upon the height and mass of woody stems, foliage volume, sunlight exposure, soil texture, rainfall and temperature conditions, and species tolerance. The higher rate range should be considered in regions of the country with higher temperatures and longer growing seasons. The users should evaluate Cutless 0.33G on small area prior to large scale applications to target landscape ornamentals.

Storage and Disposal

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container only. In case of leak or spill, contain material and dispose as waste. **Pesticide Disposal:** Wastes resulting from use of this product may be used on site according to use directions or disposed of at an approved waste disposal facility.

Container Disposal (Plastic Containers): Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat the procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, or plastic containers by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **Container Disposal (Paper or Plastic Bag):** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY DISCLAIMER

SePRO Corporation warrants that the product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent consistent with applicable law, SEPRO CORPORATION MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

INHERENT RISKS OF USE

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of SePRO Corporation as the seller. All such risks shall be assumed by buyer.

LIMITATION OF REMEDIES

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories) shall be limited to, at SePRO Corporation's election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

To the extent consistent with applicable law, SePRO Corporation shall not be liable for losses or damages resulting from handling or use of this product unless SePRO Corporation is notified in writing within twenty-one (21) days from the date of application of such losses or damages. In no case shall SePRO Corporation be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies can not be varied by any written or verbal statements or agreements. No employee or sales agent of SePRO Corporation or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or Limitations of Remedies in any manner.

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Cutless* 0.33G

Landscape Growth Regulator

A Systemic Growth Regulator for Growth Suppression of Perennial Landscape Ornamental Plants.

Active Ingredient:

flurprimidol: a-(1-methylethyl)-a-[4-(trifluoromethoxy)-	
phenyl]-5-pyrimidinemethanol	0.33%
Other Ingredients:	
Total	
Contains 0.0033 pound of active ingredient per pound of formulated product.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Harmful if swallowed, inhaled or absorbed through the skin. Causes eye irritation. Avoid breathing dust or spray mist and contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash before reuse.

Keep Out of Reach of Children CAUTION / PRECAUCIÓN

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Environmental Hazards

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Directions for Use

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Read all directions for use before applying this product.

Storage and Disposal

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container only. In case of leak or spill, contain material and dispose as waste. **Pesticide Disposal:** Wastes resulting from use of this product may be used on site according to use directions or disposed of at an approved waste disposal facility.

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Refer to inside of label booklet for additional precautionary information and Directions for Use, including Storage and Disposal.

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For additional product information, visit us at www.sepro.com

Specialty Chemical: Do not ship or store with food, feeds, drugs or clothing.

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Landscape Growth Regulator

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