



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 27 2007

Ms. Rebecca M. Horton
Consultant/ Agent for Excel Marketing
Excel Marketing
1340 Treat Boulevard, Suite 650
Walnut Creek, CA 94597

RE: Notification for 1) Deletion of "800 CLEANUP" from disposal text, 2) Updating Warranty Statement for consistency with 10/06/07 Agency guidelines, 3) Optional marketing text with currently approved label claims and 4) additional size packaging (4 lb)
EPA Registration Number: 71376-1
Date of Submission: November 14, 2007

Dear Ms. Horton:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated November 14, 2007, for the product, Excel® Systemic Rose & Flower Care. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Arrington".

for Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 71376-1	2. EPA Product Manager Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Excel® Systemic Rose & Flower Care	PM# Team 1	
5. Name and Address of Applicant (Include ZIP Code) Excel Marketing 1340 Treat Boulevard, Suite 650 Walnut Creek, CA 94597 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION

DEC 27 2007

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION of administrative label changes to include 1) deletion of "800 CLEANUP" from disposal text, 2) updating warranty statement for consistency with 10/06 Agency guidelines, 3) optional marketing text consistent with currently approved label claims, and 4) additional size packaging (4 LB). 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 or the Confidential Statement of Formula of this product. Excel Marketing understands that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA, and further understands that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and Excel Marketing may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4, 5 LB		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Rebecca M. Horton	Title Consultant/Agent for Excel Marketing	Telephone No. (Include Area Code) 540-375-8826
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Rebecca M. Horton</i>	3. Title Consultant/Agent for Excel Marketing	
4. Typed Name Rebecca M. Horton	5. Date Nov. 14, 2007	

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United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 71376-1	2. EPA Product Manager Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Excel® Systemic Rose & Flower Care	PM# Team 1	
5. Name and Address of Applicant (Include ZIP Code) Excel Marketing 1340 Treat Boulevard, Suite 650 Walnut Creek, CA 94597 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
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<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

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Section - III

1. Material This Product Will Be Packaged In:					
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* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4, 5 LB		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
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Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Rebecca M. Horton		Title Consultant/Agent for Excel Marketing		Telephone No. (Include Area Code) 540-375-8826	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Rebecca M. Horton</i>		3. Title Consultant/Agent for Excel Marketing			
4. Typed Name Rebecca M. Horton		5. Date Nov. 14, 2007			

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Excel[®] Systemic Rose & Flower Care

[Additional Brand Name(s): Lilly Miller Ready to Use Systemic Rose & Flower Care]

X-X-X

Optional Marketing Statements

Ready-to-Use

No Mixing

Insecticide & Plant Food [Fertilizer]

[Feeds plants and provides] 6 Week Protection

For Roses, Flowers and Shrubs

Absorbs through the roots to protect from the inside out

Kills both chewing and sucking insects as listed: Aphids, Lace Bugs, Leafhoppers, Cuban Laurel Thrips, Leafminers, Leaf Beetles, Leaf tiers, Root Weevils and Worms

Won't wash off with rain or sprinklers

ACTIVE INGREDIENT:

Acephate (CAS No. 30560-19-1)..... 1.5%

OTHER INGREDIENTS: 98.5%

TOTAL: 100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

(See back/side/other panel(s) for additional Precautionary Statements and First Aid)

NET WT 4/5 LB (1.8/2.27 kg)

NOTIFICATION

DEC 27 2007

Excel® Systemic Rose & Flower Care contains an effective systemic insecticide that provides up to 6 weeks control of Aphids, Lace Bugs, Leafhoppers, Cuban Laurel Thrips, Leafminers, Leaf Beetles, Leaf-tiers and Worms.

Excel® Systemic Rose & Flower Care's combination of fertilizer and systemic insecticide helps plants grow strong and vigorously, and prevents damage caused by the destructive insects listed on this label. *Systemic* means that the plant actually absorbs the insecticide through its root system and then moves it internally through the sap stream into its branches, leaves, blossoms and new growth.

Excel® Systemic Rose & Flower Care protects against insects for 6 weeks. It cannot be washed by rain or sprinkling, since the protection is internal. This systemic action protects all plant surfaces, including undersides of leaves and blossoms. New growth is also fully protected.

Excel® Systemic Rose & Flower Care kills the following insects on roses, flowers and shrubs:

- | | | |
|-----------------------|----------------------|--------------------|
| Aphids (plant lice) | Cuban Laurel Thrips* | Leafhoppers |
| Lace Bugs | Holly Leafminers | Birch Leafminers |
| Maple Shoot Moth | Elm Leaf Beetle | Willow Leaf Beetle |
| Obscure Root Weevil** | | |

**on azalea and rhododendron

*on ficus

DIRECTIONS FOR USE

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

USE RESTRICTIONS: For outdoor use around the home only. Do not allow people or pets to enter treatment area until dusts have settled. Do not apply this product in a way that will contact people or pets. Do not apply to plants used for food or feed. Do not apply to ornamentals that are planted directly beneath food producing trees such as fruit or nut bearing trees. Do not apply to lawns.

Storage & Disposal

Storage: Keep in original container. Store in a cool, dry, preferably locked area away from children and pets.

Disposal: *If empty* – Do not reuse this container. Place in trash or offer for recycling if available. *If partly filled* – Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRODUCT USAGE	
Kills	Aphids, Lace Bugs, Leaf Beetles, Leafhoppers, Leafminers, Worms, and other listed insects.
Feeds	X-X-X Fertilizer
Use on	Roses, Flowers, Shrubs & Ornamentals including ageratum, aster, azalea, birch, cherry laurel, chrysanthemum, crape myrtle, Cuban laurel (ficus), dahlia, elm, holly, maple, marigold, petunia, photinia, pyracantha, salvia, spirea, snapdragon, sycamore, viburnum, willow, yaupon, zinnia
Amount to Use	<p>Established Roses: ½ cup per 9 sq. ft. (3' x 3')</p> <p>Flowers: ⅔ lb. per 25 sq. ft. (5' x 5')</p> <p>Shrubs & Ornamentals: ⅔ cup for each foot of plant height.</p>
When to Use	When plants have about 1 inch of new growth in the spring. Reapply every 6 weeks through the summer.
How to Use	<p>Established Roses: Work into the top 1-2 inches of the soil, taking care not to disturb plant roots. Water thoroughly. Do not apply to newly planted roses until they have become well established (planted in the ground for 3 months).</p> <p>Flower Beds: Work into the top 1-2 inches of the soil. Plant seed or set plants and water thoroughly. Do not apply additional fertilizer for 6 weeks. Do not get on foliage when foliage is wet.</p> <p>Ornamental Shrubs & Trees (under 12 ft. tall): Distribute evenly from the base to the dripline of all sides of the plant. Work into the top 1-2 inches of the soil and water in thoroughly.</p>

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. When handling this product or mixing into the soil as directed, wear long pants and long-sleeved shirt, socks, shoes and gloves. Wash the outside of gloves with soap and water before removing. Remove and wash contaminated clothing before reuse.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Environmental Hazards

Do not apply directly to water. Do not contaminate water by cleaning of equipment and washwaters or rinsate.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact x-xxx-xxx-xxxx [the National Pesticide Information Center at 1-800-858-7378] for emergency medical treatment information.

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

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 five 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Contains an organophosphate that inhibits cholinesterase. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

~~**WARRANTY:** Excel Marketing guarantees this product to the extent of the purchase price, only when used according to directions.~~

NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label instructions.

Optional:

? 1-888-648-9855

+ 1-800-424-9300

Guaranteed by
Excel Marketing
 1340 Treat Blvd., Suite 650
 Walnut Creek, CA 94597

[Fertilizer guarantee/claims:]

GUARANTEED ANALYSIS	X-X-X
Total Nitrogen (N).....	x.xx%
x.xx% Ammoniacal Nitrogen	
x.xx% Nitrate Nitrogen	
x.xx% Urea Nitrogen (and/or Other Water Soluble Nitrogen)	
x.xx% Water Insoluble Nitrogen*	
Available Phosphate (P ₂ O ₅)	x.xx%
Soluble Potash (K ₂ O)	x.xx%
Calcium (Ca)	x.xx%
Magnesium (Mg).....	x.xx%
x.xx% Water Soluble Magnesium (Mg)	
Sulfur (S).....	x.xx%
x.xx% Combined Sulfur (S)	
Boron (B)	x.xx%
Total Iron (Fe).....	x.xx%
x.xx% Water Soluble Iron (Fe)	
Total Manganese (Mn).....	x.xx%
x.xx% Water Soluble Manganese (Mn)	
Molybdenum (Mo).....	x.xxx%
Total Zinc (Zn).....	x.xx%
x.xx% Water Soluble Zinc (Zn)	

Derived from

*x.xx% slowly available nitrogen from ...

Information concerning the raw materials composing this product can be obtained by writing to the Guarantor listed on this label, and referring to the batch number found on this container.
Information regarding the contents and levels of metals in the fertilizer portion of this product is available on the internet at <http://www.aapfco.org/metals.htm>

F XXX

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Registrations
by Design, Inc.™

118½ East Main Street
Suite 1
Salem, VA 24153-3805
phone 540.375.8826
fax 540.375.8827

CERTIFIED MAIL 7007 0710 0002 1183 1044
November 14, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs / Registration Division (7505P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, DC 20460

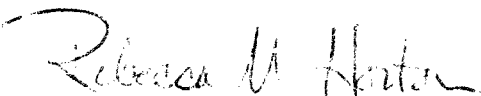
Re: Notification of Administrative Label Changes
EPA Reg. No. 71376-1, EXCEL® Systemic Rose & Flower Care

Attn: Linda Arrington, Team Leader
Minor Formulations & Notifications

On behalf of Excel Marketing of Walnut Creek, California, enclosed is notification of administrative label changes for the above pesticide registration, including (1) deletion of "800 CLEANUP" from disposal text, (2) updating the warranty statement for consistency with 10/06 Agency guidelines, (3) optional marketing text consistent with currently approved label claims, and (4) additional size packaging.

All areas of revision are highlighted for your convenience in review.

Best regards,



Rebecca M. Horton
Consultant/Agent for
EXCEL MARKETING

e-mail: hortonb@ntelos.net

/bmh

Enclosure