

73512-1

02-07-2011

1/6



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Richard T. Mayer
KeyPlex®
c/o Morse Enterprises Limited, Inc.
P.O. Box 2515
Winter Park, FL 32789

FEB 07 2011

Subject: Notification to Add Alternate Brand Name per PRN 98-10
Product Name: KeyPlex 350
EPA Reg. No: 73512-1
Your Submission Dated January 21, 2011

Dear Dr. Mayer:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 98-10, as referenced above. A screen of this request has been conducted for applicability under PRN 98-10, and it has been determined that the action request falls within the scope of this document. Our records have been duly noted, and the product label submitted with this application has been stamped "Notification Accepted" and has been placed in our records as current and updated. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at casciano.gina@epa.gov.

Sincerely,

Linda Hollis

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)



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 KeyPlex/KP350	2. EPA Product Manager PM# 91	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Morse Enterprises Limited, Inc. DBA KeyPlex	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. 73512-1 Product Name KeyPlex 350 Date: FEB 07 2011 Reviewer: G. Cascardi	
5. Name and Address of Applicant (Include ZIP Code) Morse Enterprises Limited, Inc. DBA KeyPlex, Suite 207, 1155 Louisiana Ave., Winter Park, FL 32789 USA Mail: P.O. Box 2515, Winter Park, FL 32789 USA <input checked="" type="checkbox"/> Check if this is a new address	Notification Accepted	

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.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
This product is currently registered with EPA as KeyPlex 350 (EPA Reg. No. 73512-1). The KeyPlex company wishes to have an alternate product name for product used by the professional gardener, landscaper, lawn care operator, etc., and decided that KeyPlex 350 GTO (garden, turf, ornamental) would be appropriate.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. 11.3 lb/Gal	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 1 quart, 1 Gal, 2.5 Gal, 30 Gal, 250 Gal		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input 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 Dr. Richard T. Mayer	Title Director Regulatory Affairs	Telephone No. (include Area Code) 706-206-0695
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.		8. Date Application Received (Stamped)
2. Signature 	3. Title Director Regulatory Affairs	
4. Typed Name Dr. Richard T. Mayer	5. Date January 21, 2011	



January 21, 2011

NOTIF
Linda Hollis
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Notification of Alternate Trade/Product
Name

Dear Ms. Hollis,

Our company would like to have an alternate trade/product name for KeyPlex 350 which is registered as a biopesticide with the EPA (EPA Reg. No. 73512-1). The reason for doing this is for marketing purposes to emphasize product use for professional gardeners and turf management persons. The alternate name is KeyPlex 350 GTO (garden, turf, ornamentals). This product is identical to KeyPlex 350 with regard to contents.

Consequently, we are notifying the EPA of these changes. Please find enclosed five copies each of completed Form 8570-1, the MSDS for KeyPlex 350, the Jug Label for KeyPlex 350, the Booklet Label for KeyPlex 350, the MSDS for KeyPlex 350GTO, the Jug Label for KeyPlex 350GTO, and the Booklet Label for KeyPlex 350GTO. We have previously discussed these changes with Mr. Chris Pfeifer.

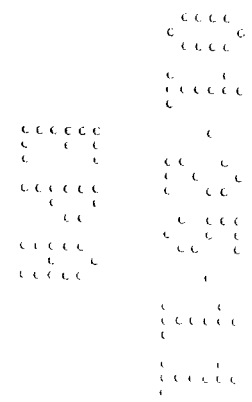
If anything else is needed please contact me. My telephone number is 706-206-9695 and my email address is rtmayer@keyplex.com.

Thank you for your attention to this matter.

Sincerely,

Richard T. Mayer
Director of Regulatory Affairs

Enclosures



5/6

KeyPlex[®] 350

With Chelated
Micronutrients, Yeast
Hydrolysate, Humic Acid,
and Alpha-Keto Acids

ACTIVE INGREDIENT

Yeast extract Hydrolysate from <i>Saccharomyces cerevisiae</i>	0.063%
OTHER INGREDIENTS	99.937%
TOTAL	100.000%

Refer to fertilizer ingredients section of label for nutritional content information.

**STOP - READ THE LABEL BEFORE USE
KEEP OUT OF REACH OF CHILDREN**

CAUTION

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 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. **Personal Protection Equipment (PPE):** Applicators and other handlers must wear long sleeved shirts, long pants, socks, and shoes. Follow manufacturer's instruction for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. **Environmental Hazards:** Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean water high-water mark. Do not contaminate water by cleaning or disposal of equipment wash waters.

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

GUARANTEED ANALYSIS

Total Magnesium (Mg).....	1.50%
1.50% Water Soluble Magnesium (Mg)	
Combined Sulfur (S).....	4.00%
Boron (B).....	0.16%
Iron (Fe).....	3.50%
3.50% Chelated Iron (Fe)	
Manganese (Mn).....	0.75%
0.75% Chelated Manganese (Mn)	
Molybdenum (Mo).....	0.003%
Zinc (Zn).....	0.75%
0.75% Chelated Zinc (Zn)	

Derived From: Magnesium Sulfate, Manganese Glucoheptonate, Zinc Glucoheptonate, Iron Glucoheptonate, Sodium Borate and Sodium Molybdate.

NON-PLANT FOOD INGREDIENTS

Alpha-Keto Acids	0.063%
Humic Acid.....	0.42%

Purpose: To enhance nutrient uptake.

F528

See Accompanying Booklet for Directions for Use and Complete Label.

U.S. Patent No. 6060074 • EPA Reg. No. 73512-1 • EPA Est. 75777-FL-001

Net Content: _____ Wt. Per Gallon: _____ Lot Number: _____

Manufactured by: KeyPlex • Mail: P.O. Box 2515, Winter Park, FL 32790 • Street: 1155 Louisiana Avenue, Suite 207, Winter Park, FL 32789 • Toll Free: 1-800-433-7017 www.KeyPlex.com
KeyPlex is a Registered Trademark of KeyPlex
MADE IN THE USA | Ap.No.KPX01010

5/6

KeyPlex[®] 350

With Chelated Micronutrients, Yeast Hydrolysate, Humic Acid, and Alpha-Keto Acids

ACTIVE INGREDIENT

Yeast Hydrolysate from <i>Saccharomyces cerevisiae</i>	0.063%
OTHER INGREDIENTS	99.937%
TOTAL	100.000%

Refer to fertilizer ingredients section of label for nutritional content information.

**READ THE LABEL BEFORE USE
KEEP OUT OF REACH OF CHILDREN**

CAUTION

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 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-433-7017 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

Personal Protection Equipment (PPE): Applicators and other handlers must wear long sleeved shirts, long pants, socks, and shoes. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

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 disposing of equipment wash water or rinsate.

Manufactured by:

KeyPlex

Mail: P.O. Box 2515, Winter Park, FL 32790

Street: 1155 Louisiana Avenue, Suite 207, Winter Park, Florida 32789

Toll Free: 1-800-433-7017 • www.keyplex.com

U.S. Patent No. 6,694,074 • EPA Reg. No. 73512-1 • EPA Est. 7577-FL-001

**FERTILIZER INGREDIENTS
[NUTRITIONAL CONTENT (from other ingredients)]
GUARANTEED ANALYSIS**

Total Magnesium (Mg)	1.50%
1.5% Water Soluble Magnesium (Mg)	
Combined Sulfur (S)	4.00%
Boron (B)	0.16%
Iron (Fe)	3.50%
3.50% Chelated Iron (Fe)	
Manganese (Mn)	0.75%
0.75% Chelated Manganese (Mn)	
Molybdenum (Mo)	0.003%
Zinc (Zn)	0.75%
0.75% Chelated Zinc (Zn)	

Derived From: Magnesium Sulfate, Manganese Glucoheptonate, Zinc Glucoheptonate, Iron Glucoheptonate, Sodium Borate and Sodium Molybdate.

NON-PLANT FOOD INGREDIENT

Alpha-Keto Acids	0.063%
Humic Acid	0.42%
P528	

IPM Use for Plant Disease Management

KeyPlex 350 will aid in the prevention of certain plant diseases when applied as a foliar spray, such as post-bloom fruit drop and greasy spot diseases of citrus, and bacterial leaf spot of tomatoes.

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 4 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 • Shoes plus Socks • Waterproof Gloves

NON-AGRICULTURAL USE REQUIREMENTS

These requirements apply to uses of this product that are NOT within the WPS 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. For non-agricultural uses, do not enter treated areas without protective clothing until spray has dried.

GENERAL INFORMATION

KeyPlex 350 is a formulation of micronutrients most often found deficient in commercial crops and trees. It contains alpha-keto acids, which facilitate utilization of micronutrients, and increase resistance to environmental stress.

KeyPlex 350 will elicit production of defensive proteins in certain plants. KeyPlex 350 will aid in the prevention of certain plant diseases such as post-bloom fruit drop and greasy spot diseases of citrus, and bacterial leaf spot of tomatoes. For disease control, apply foliar sprays of KeyPlex 350 in sufficient water to obtain adequate coverage.

KeyPlex 350 is formulated for foliar application or fertigation to prevent and correct micronutrient deficiencies when used as directed. Maintaining proper levels of micronutrients usually results in increased plant vigor, better yields, superior fruit size and quality, and longer shelf life.

SPRAY DRIFT FOR AERIAL APPLICATION

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

SPRAYING, MIXING AND COMPATIBILITY

KeyPlex 350, when added to the spray tank water, will lower the water pH, and can be used in combination with other pesticides. However, in unfamiliar mixtures use a "jar compatibility" test using proper proportions of chemicals and water.

DIRECTIONS FOR USE

Application Rates for Crops and Turf

CROP	QUARTS/ACRE	CROP	QUARTS/ACRE
Tomatoes	1 to 2 *	Other Vegetables	1 to 2 *
Small Fruits	1 to 2 *	Peanuts	1 to 2 *
Cotton	1 to 2 *	Tobacco	1 to 2 *
Other Field Crops	1 to 2 *	Turf	1 to 2 *
Citrus	2 to 3 *	Tropical Fruits	2 to 3 *
Peaches	2 to 3 *	Other Deciduous	2 to 3 *
Pecans	2 to 3 *	Other Tree Nuts	2 to 3 *

*Addition of 3 to 5 pounds of Urea or Potassium nitrate per 100 gallons of water will aid leaf assimilation.

Citrus:

Apply 2 to 3 quarts per acre as a foliar spray. If a pre-bloom application is made, apply 2 to 3 quarts per acre. Repeat applications at petal fall and make one or two summer sprays as needed. The summer sprays should be applied with summer oil. Tank mix KeyPlex 350 with summer oil and apply the oil at the manufacturer's recommended rate of application. Thorough Spray coverage of plant foliage is essential.

Vegetables including Pepper and Tomato:

Apply 1 to 2 quarts per acre starting at the 4-6 leaf stage. Two applications should be applied prior to bloom followed by at least four applications after bloom, as needed. Apply at least six applications to tomatoes and peppers. At least six applications are also recommended on other vegetables. KeyPlex 350 can either be applied as a foliar spray or by fertigation (low volume irrigation). For foliar spray applications, thorough coverage of the foliage is essential.

For other crops and turf refer to table for use rates:

For other crops apply one foliar application before bloom, and at least two foliar applications after bloom, as needed. For annual crops, apply the first application at the 4-6 leaf stage. Thorough spray coverage of the plant foliage is essential.

AERIAL APPLICATION:

Use 1 to 3 quarts of KeyPlex 350 per acre in at least 15 gallons of water per acre.

APPLICATION RATES FOR ORNAMENTAL PLANTS:

Use 1 quart of KeyPlex 350 per 100 gallons of water. Addition of 1 to 2 pounds of urea or potassium nitrate per 100 gallons of water will aid leaf penetration.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **Pesticide Storage:** Store in a cool, dry location. **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 by incineration, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability of fitness of a particular product expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions not reasonably foreseeable by the seller, and buyer assumes the risk of any such use.

Net Content:	Weight Per Gallon:	11.0 lb.
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MADE IN THE USA | KeyPlex is a Registered Trademark | Ap.No.KP00411

2/5

6/2

APPLICATION INSTRUCTIONS FOR CHEMIGATION

KeyPlex 350 may be applied through drip irrigation systems.

Apply this product only through drip irrigation systems. 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 any 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.

A pesticide supply tank is recommended for the application of KeyPlex 350 in chemigation systems. Use a minimum of 15 parts of water to 1 part of KeyPlex 350 in the solution tank. Agitation is not required.

Apply KeyPlex 350 at rates and timings as directed on this label.

Chemical tank and injector system should be thoroughly cleaned before use. Flush system with clean water.

Application should be in sufficient water and of sufficient duration to apply the recommended rate evenly to the entire treated area.

Do not allow irrigation water to collect or run-off during chemigation.

The system should provide uniform waterflow and should have no leaks.

Introduce KeyPlex 350 into the irrigation water during the end of the irrigation cycle. Adjust flow from injection equipment to use contents over a period of 30 minutes to 1 hour.

USE PRECAUTIONS FOR CHEMIGATION

DO NOT apply this product through irrigation systems connected to a public water system. Public water system means a system for the provision to the public of piped water for human consumption if such a 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. The soil should have adequate moisture prior to chemigation.

Terminate chemigation at depletion of KeyPlex 350 from the main feed supply tank or after 6 hours from start, whichever is shorter. For maximum efficacy, subsequent irrigation (water only) should be delayed for at least 24 hours following chemigation.

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on irrigation pipeline to prevent water-source contamination from backflow.
2. The pesticide injection must contain a functional, automatic, quick-closing check valve to prevent the flow of fluids back towards the injection pump.
3. 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.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. 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.
6. 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.

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

