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JAN 20 1999

Floyd E. Faucitt, President Waupaca Northwoods, LLC E3439 Highway 22 & 54 Waupaca, WI 54981

Dear Mr. Faucitt:

SUBJECT:

Label Amendment for Product Transferred from

Pace International, LP

NuLife Lawn Winterizer 5-3-8,

EPA Reg. No. 64864-19

Application Dated September 11, 1998

The labeling referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide act, as amended is acceptable with the following provisions:

- 1. Under the "Precautionary Statements" revise to read as follows: "Causes moderate eye irritation. Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing dust or contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling."
- 2. Under the "Statement of Practical Treatment" section of the labeling, revise as follows:
 - a. In the "Ocular Statement" delete the phrase "for at least 15 minutes" so that it reads: "Flush eyes with plenty of water."
 - b. In the "Dermal Statement" add the following sentence: Get medical attention if irritation persists."
- 3. On the first page of the labeling, delete the phrase "Helps control disease", and on the second page, second paragraph, delete the phrase "disease resistant" because the claims imply that the product may contain a fungicide for disease control or a plant regulator to induce disease resistance. In addition, on the first page of the labeling, delete the phrase "natural organic" as this claim constitutes an implied safety claim."

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CONCURRENCES								
SYMBOL .	7505C							
SURNAME >	DMorgan							
DATE .	Jan 20, 1999							

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

Joanne I. Miller Product Manager (23) Fungicide-Herbicide Branch Registration Division (7505C)

Enclosure

Nulife Fall Winterizer Moss Cure and Lawn Food 5-3-8

25% Natural Organic

Helps control disease, rids moss from lawns.

With Slow Release Nitrogen for continuous feeding throughout the Winter

Quality blend for lush green grass with Moss Cure

Year-Round Care Made Easy

Year Round Easy Care Program

Covers 5000 sq. ft. Builds strong roots

Helps Control Disease

Rids Moss from Lawns

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for additional precautionary statements, use directions & guaranteed analysis.

ACTIVE INGREDIENT:

Ferrous Sulfate Monohydrate......20.0%

(FeSO₄ • H₂O)

INERT INGREDIENTS.....80.0%

TOTAL.....100.0%

EPA REG. NO. 64864-19 EPA EST. NO. 64864-WA-2

Net Weight: 40 lb (18.14 kg)

ACCEPTED
with COMMENTS
In EPA Letter Dated

JAN 20 1999

Under the Federal Insecticide. Fundicide, and Rodenticide Act as amended, for the posticide registered under EPA Reg. No. Label Text for EPA Reg. No. 64864-19

DIRECTIONS FOR USE:

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

To take lawns through the Winter season in a sturdy, disease resistant condition, use NuLife Fall Winterizer Moss Cure & Lawn Food during the fall, anytime after September 1.

The most satisfactory results from application of this product are obtained if the following steps are taken (preferably in this order):

- 1. Rake lawn with a steel rake, scratching up trailing moss and grass mat. Mow to 1" height.
- 2. Apply this product with a fertilizer spreader, using 40 lbs. per 5,000 sq. ft. of lawn area.
- 3. Water thoroughly to wash (distribute) this product (fertilizer) into root zone after application.

spring, summer, autumn	1	Evergreen Multi-Purpose Top Soil: Create a growing medium for lawns, gardens, or wherever the ground is of a hard, clay consistency.
autumn, winter	2	Evergreen Fall & Winter Lawn Food & Moss Cure 8-8-8: For building of strong roots and ridding moss from lawns.
spring, summer, autumn	3	Evergreen Garden Fertilizer 5-10-10: Mix into soil and at regular intervals for lush, green plants.
spring, summer, autumn, winter	4	Evergreen Garden Bark: Create decorative landscaping around lawns and gardens and suppress weed growth by blocking out light.

Recommended Fertilizer Spreader Settings*

Make of Spreader	Setting
Scott	6
Lawn Beauty	7
Sears	6 1/2
Ortho Drop-Type	4

Spread one-way, being careful not to skip.

The above spreader settings are approximate. Check your spreader on 120 sq. ft. and adjust to apply at the rate of 1lb. per 125 sq. ft. Clean spreader thoroughly after use.

*As calibration and general condition of spreader can materially affect the rate of flow, neither the manufacturer nor the seller can guarantee exact coverage as indicated by the above recommended dial settings.

STORAGE & DISPOSAL

STORAGE: Store in original container and keep container with unused product in a locked storage area inaccessible to children and domestic animals. Do not store near food or feeds. To prevent cross-contamination, do not store near other fertilizers or near herbicides, insecticides, fungicides or seeds.

PESTICIDE DISPOSAL: To dispose of containers which contain unused product, securely wrap container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse or recycle empty container. Discard in trash.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful If Swallowed. Keep Out Of Reach Of Children. Avoid inhalation of dust or contact with eyes, skin and clothing. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching back of the throat with finger or by giving Syrup of Ipecac. Do not induce vomiting or give anything by mouth to an unconscious person. Call a physician immediately. IF IN EYES: Flush eyes with plenty of water for at least 15 minutes. If irritation persists,

get medical attention.

IF ON SKIN: Wash thoroughly with soap and water.

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 washwater or rinsate.

Guaranteed Analysis:	
Total Nitrogen (N)	5.00%
2.0% Ammoniacal Nitrogen	
2.5% Water Insoluble Nitrogen	
0.5% Urea Nitrogen	
Available Phosphate (P2Os)	3.00%
Soluble Potash (K ₂ 0)	8.00%
Calcium(Ca)	
Magnesium(Mg)	
Sulfur(S)	
fron (Fe)	
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Derived from: Ammonium Phosphate, Sulfate of Ammonia, Muriate of Potash, Urea, Dolomite, Ferrous Sulfate, Process Tankage.

For an attractive lawn year-round, apply the proper fertilizer every 8 weeks during spring. summer and fall. (Approximately 3-4-times per year).

SPRING	SUMMER	SUMMER	FALL	WINTER :
Evergreen Lawn	Evergreen Lawn		Evergreen Lawn	Evergreen Fall &.
Food With Moss	Food	Food With Weed	Food With Moss	Winter Lawn
Control		Control	Control	Food 8 Moss 🕠
1				Cure

Label Text for EPA Reg. No. 64864-19

ATTENTION: This product contains iron. Iron will stain. Do not allow this product to contact patios, driveways, concrete, stonework, or clothing. Sweep concrete surfaces immediately to prevent staining. If concrete surface is wet when contact occurs, staining may be impossible to prevent.

NOTICE TO BUYER

Our recommendations for use of this product are based upon tests and/or information believed to be reliable. The use of this product being beyond control of the manufacturer, no guarantee expressed or implied, beyond refund of purchase price is offered. Buyer assumes all risk of improper storage and application of this product or its improper use in combination with other materials.

Our Promise of Quality

This product is manufactured according to Pace International specifications and standards for quality and consistency. Pace International will refund your purchase price if you are unsatisfied with this product.

GUARANTEE

If you are not satisfied with this product, send you name, address, and proof of purchase and we will be happy to refund your money.

Nulife is a Registered trademark of Pace International LP
Manufactured by: Pace International LP, 500 Seventh Ave. S., Kirkland, WA 98033

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