

Pm13

2935-416

117

Pa 44 pds/gal

APR 23 1988

Mr. Terry Miller
Wilbur Ellis Company
191 West Shaw Avenue, Suite 107
Fresno, CA 93704-2876

Dear Mr. Miller:

Subject: Amendment - Revised Labeling
Rose Guard 8-12-6
EPA Registration No. 2935-446
Your Submission Dated February 18, 1988

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable provided that you:

1. Make the changes listed below before releasing the product for shipment bearing amended labeling.
 - a. Modify "Do not contaminate water by cleaning of equipment . . ." to read "Do not contaminate water when disposing of equipment washwaters."
 - b. Under fertilizer analysis, reinstate the composition of the soil penetrant material [i.e., (alkylated aryl polyether alcohol)].
2. Submit one (1) copy of the final printed labeling incorporating the changes above.

11243:I:Mountfort:MF-3:KENCO:4/20/88:4/29/88:SG:wb:vo:psr:rw:VO:CB

CONCURRENCES

SYMBOL	ORIGINATOR							
.....
SURNAME
DATE

A stamped copy of the labeling is enclosed for your records.

Since this concludes your response under the Trifluralin Registration Standard, please send future correspondence to George T. LaRocca, PM 15.

Sincerely yours,

Richard F. Mountfort *RFM*
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosure

WILBUR-ELLIS

ROSE GUARD (R)

8-12-6 Balanced Plant Food • Di-Syston(R)
Systemic Insecticide

Treflan(R) Selective Pre-Emergence Herbicide
•Soil Penetrant • Trace Minerals

A Triple Action Rose Care Product

•Feeds Roses •Kills Insects •Controls Weeds

ACCEPTED
with COMMENTS
in EPA Letter dated:

APR 22 1988

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is registered under EPA Reg. No. 2935-446

ACTIVE INGREDIENTS:

Disulfoton [0,0-Diethyl S-[2-(ethylthio)ethyl]
phosphorodithioate] 1.00%

Trifluralin [alpha, alpha, alpha-trifluoro-2,6-dinitro-
N,N-dipropyl-p-toluidine] 0.17%

INERT INGREDIENTS: 98.83%
TOTAL 100.00%

Di-Syston - Reg. TM of Bayer AG, Leverkusen
Treflan - Reg. TM of Elanco Products trifluralin

KEEP OUT OF REACH OF CHILDREN (12 pt.)

WARNING (18 pt.)

See back panel for additional precautionary statements and State-
ment of Practical Treatment

Net Weight: 5 Pounds

EPA Reg. No. 2935-

EPA Est. No.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning: Keep out of reach of children and pets. May be fatal if swallowed. May be absorbed through the skin. Do not get on skin, in eyes, or on clothing. Wear rubber gloves. Do not breathe dust. Keep children and pets away from treated area until product is worked and watered into soil and treated area is completely dry. Wash hands thoroughly with soap and water after handling. Do not contaminate feed or foodstuffs. Poisoning may occur as result of exposure.

STATEMENT OF PRACTICAL TREATMENT

) If swallowed: Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Never induce vomiting or give anything by mouth to an unconscious person.

) If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.

If on Skin: Remove contaminated clothing. Wash affected areas with soap and water.

If in Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: 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.

) ENVIRONMENTAL HAZARDS

) This product is toxic to fish and wildlife. Do not apply directly to water or wetlands (swamps, bogs, or marshes). Drift and runoff from treatment areas may be hazardous to aquatic organisms in neighboring aquatic sites. Do not contaminate water by cleaning of equipment or disposal of waste. Cover or incorporate spills.

) DIRECTIONS FOR USE

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

Rose Guard is a 3 in 1 rose care product scientifically formulated to keep plants healthy and strong, free from injury and damage caused by sucking insects, and growing in soil unspoiled by offensive broadleaf weeds and annual grasses. In addition, it contains chelated iron, manganese

and zinc trace minerals to supplement the balanced rose food. Soil penetrant is added to reduce surface tension of soil, thus permitting the plant food and insecticide materials to move directly to the root zone for efficient feeding and systemic action.

Systemic means that the insecticide is taken up by the roots like water and carried throughout the plant to every branch, leaf, and tender new growth by the sap system. Sucking insects that tap the plant's sap stream for food are quickly killed by the insecticide. Effective protection against insects is provided for up to six weeks. The insecticide formula will not harm the plants or its new growth.

Rose Guard works internally. It cannot be washed off the plant by rain or sprinkling. All surface areas of the foliage and canes are protected including the undersides of leaves and all new growth.

The Rose Guard formula supplies the required nitrogen, phosphoric acid and potash plus chelated iron and other trace minerals to maintain strong, healthy and beautiful roses and ornamental plants.

Weed control is long lasting. More than two dozen different kinds of annual grasses and broadleaf weeds are killed as they germinate by the selective pre-emergence weed control chemical in Rose Guard. It will not harm roses, gladiolus, or ornamentals. The material will not kill established weeds; however, when used as directed it will prevent the regrowth of weeds.

WEEDS CONTROLLED BY ROSE GUARD: Crabgrasses, Barnyardgrass, Fox-tails, Johnsongrass (from seed), Goosegrass, Annual Bluegrass, Stinkgrass, Bromegrass, Jungle-rice, Sprangletop, Cheat, Pigweeds (Spiny or Redroot), Carelessweed, Lambsquarters, Carpetweed, Russian Thistle, Kochia, Purslane, Florida Pussley, Knotweed, Stinging Nettle, Goosefoot, Chickweed, Puncturevine.

INSECTS KILLED BY ROSE GUARD: Aphids (Plant Lice), Spider Mites, Thrips, Leafhoppers, Whiteflies, Lace Bugs, Holly Leaf Miners, Birch Leaf Miners, Mimosa Webworms, Pine Tip Moths.

WHEN TO USE: Make first application after cultivating and when rose bushes have about 1 inch of new growth. Repeat application at 4 to 6 week intervals during the growing season.

HOW TO USE:

On Established or Newly Planted Rose Bushes: Before application, remove all unwanted vegetation (weeds and grasses) from area around rose bushes. Rose Guard kills certain weeds as they germinate, but will not kill weeds and grasses after they are established. Cultivate the rose bed area, then smooth soil. Spread 4 ounces by weight ($\frac{1}{2}$ to $\frac{3}{4}$ cup or 10 tablespoonsful) as evenly as possible

around each rose bush, covering 8 to 10 square feet of ground area. Avoid missing small areas, since weeds and grasses may grow where this product does not cover the soil. Work material lightly into the top 1 inch of soil, then water thoroughly. Do not apply directly into planting hole.

On Ornamental Shrubs: Apply 4 ounces by weight ($\frac{1}{2}$ to $\frac{3}{4}$ cup or 10 tablespoonfuls) for each 8 to 10 square feet of ground area occupied by plant or each 5 feet of row (2 feet wide).

On Established Bedding Plants, on Flowers and on Bulbs: Apply 2½ pounds of Rose Guard per each 100 square feet (5 x 20 feet) of bed area. Work into top 1 inch of soil and water thoroughly. It is not necessary to apply additional fertilizer for 4 weeks. Do not use when planting from seed.

RESTRICTIONS: Use this product only in accordance with label directions. Do not re-use container for any purpose. Do not apply broadcast applications to grass or dichondra lawn or areas planted to any seed variety. Do not apply to areas where roots of fruit trees, vegetables, or other food crops may extend. Do not apply around Amaranthus, Celosia, Portulaca, Ajuga, and Periwinkle.

STORAGE AND DISPOSAL (12 pt.)

STORAGE: Store in a cool dry place. Keep in original container and preferably in a locked storage area.

PESTICIDE DISPOSAL: Securely wrap container in several layers of newspaper and discard in trash.

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

BEST AVAILABLE COPY

GUARANTEED ANALYSIS:

Total Nitrogen (N) 8.00%
 4.00% Ammoniacal Nitrogen
 3.00% Organic Nitrogen, water insoluble
 1.00% Organic Nitrogen, water soluble

Available Phosphoric Acid (P₂O₅) 12.00%

Soluble Potash (K₂O) 6.00%
 Derived from: Sludge, Ureaformaldehyde, Ammonium Phosphate, Sulphate of Potash.

Secondary Plant Nutrients:

Sulphur (S) 4.00%
 Iron (Fe) 1.60%
 Chelated Iron (Fe) 0.10%
 Manganese (Mn) 0.15%
 Zinc (Zn) 0.15%
 Soil Penetrant 1.00%
 Derived from: Sulphate of Potash, Iron Sulphate, Natural Minerals (Iso-Pyrrhotite, Iso-Wurtzite)

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Wilbur-Ellis Co.
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Fresno, CA 93755

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