



005887-00171-021299

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Systems Integration Group, Inc.

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98



United States
Environmental Protection Agency
Washington, DC 20460

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

OPP Identifier Number
254826

Application for Pesticide - Section I

1. Company/Product Number 5887-171	2. EPA Product Manager G. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Rose Guard 8-12-6	PM# PM-13	
5. Name and Address of Applicant (Include ZIP Code) SureCo, Inc. an indirect subsidiary of Verdant Brands, Inc. 7501 Harps Mill Rd. Raleigh, NC 27615-5422 <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

FEB 12 1999

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

Notification to add "Control Many Weeds & Grasses" to the front panel.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input 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 checked="" type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
		If "Yes" Package wgt.	No. per container	<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 5 lbs.		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 Stacy Schmidt-Hartis	Title Regulatory Affairs Spec.	Telephone No. (Include Area Code) 919-843-8872
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 	3. Title Regulatory Affairs Specialist	
4. Typed Name Stacy Schmidt-Hartis	5. Date 2/4/99	

ROSE GUARD

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 Many Weeds & Grasses

Active Ingredients:

Disulfoton [O,O-Diethyl S- [2-(ethylthio)ethyl] phosphorodithioate]	1.00%
Trifluralin [alpha, alpha, alpha-trifluoro-2, 6 -dinitro-N,N-dipropyl- p-toluidine]	0.17%
Other:	<u>98.83%</u>
TOTAL:	100.00%

Di-Syston - Reg. TM of Bayer AG, Leverkusen
Treflan - Trademark of Dow AgroSciences LLC

KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements and Statement of
Practical Treatment

Net Weight: 5 Pounds

EPA Reg. No. 5887-171

EPA Est. No. 769-GA-1

Distributed by:
SureCo, Inc.
an indirect subsidiary of Verdant Brands, Inc.
9555 James Avenue South, Suite 200
Bloomington, MN 55431
(612) 703-3300

NOTIFICATION

FEB 12 1999

**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.

FIRST AID

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 when disposing of equipment washwaters. 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, Foxtails, 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 (1/2 to 3/4 cup or 10 tablespoonfuls) 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 (1/2 to 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 2 1/2 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

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

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

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

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 (P ₂ O ₅)	12.00%

Soluble Potash (K₂O)

Derived from: Sludge, Ureaformaldehydr, 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)	

IMPORTANT: Read these entire Directions and Conditions of Sale before using this product. **DISCLAIMER:** SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.

NOTICE: Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticides Telecommunications Network at 1-800-858-7378.

2/99 Notification statement