

9240-8

5/5/2010

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Willard Cox
Wolfkill Feed & Fertilizer Corporation
PO Box 578
Monroe, WA 98272

MAY - 5 2010

Subject: Label Amendment – Storage & Disposal, Environmental Hazards, & Marketing Claims
Product Name: ALL PRO 12-2-4 Lawn Food with Moss Control
EPA Registration Number: 9240-8
Submission Dated: October 28, 2009
Decision Number: 429460

The label amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the following changes to the product labeling:

- 1) The following marketing statements must be deleted from the label:
 - a. "See results in hours"
Note: This claim must be qualified.
 - b. "Kills lawn moss quickly"
Note: This claim must be qualified.
 - c. "No excessive growth, less mowing!"
Note: This claim must be qualified.
 - d. "Kills Moss Fast"
Note: This claim must be qualified.
 - e. "Builds a Healthier Lawn that is Easier to Care For"
Note: This claim must be qualified.
- 2) Correct the typographical error at the top of page 2 changing "Weeds" to "Weeks" for the statement to read "Gentle Greening for 8 Weeks".
- 3) Note: While no additional data is being requested at this time, marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting marketing claims made on the product label is not available then those claims must be removed.
- 4) Under the NORMAL FEEDING header on page 3, the amount of square feet covered by a 20 lbs. bag must be changed to match the statement at the bottom of page 1. The NORMAL FEEDING statement must read "For normal control of moss, apply at the

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rate of four pounds per 1,000 square feet. A 20-pound bag covers 5,000 square feet; 40-pound bag covers 10,000 square feet, properly applied. This application will provide turf with 1/2 pound of nitrogen, 1/3 pound of iron, per 1,000 square feet, plus phosphorus and potash essential to this early spring treatment.”

Note: If the text above does not accurately reflect the approved application rate, you must submit an amended label with the appropriate corrections for fast track review to the Agency.

- 5) Per the Label Review Manual, the heading “Storage” must be changed to “Pesticide Storage” in the STORAGE AND DISPOSAL section of the label for residential/household uses.
- 6) Per the Label Review Manual, the Container Disposal statement for household or residential use products must read “Container Disposal: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.”

Note: The additional “Spill: In case of spill....” language is acceptable and should appear after the statement above.

Note: Because of its importance, the Agency recommends that Storage and Disposal text be placed in a box.

- 7) Per the Label Review Manual, the optional STORAGE AND DISPOSAL statement for non-residential use must read as follows:

“STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store this product only in its original container in a dry, cool, secured storage area.

Pesticide Disposal: Wastes resulting from the use of this product maybe disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.”

Note: The additional “Spill: In case of spill....” language is acceptable and should appear after the statement above.

Note: Because of its importance, the Agency recommends that Storage and Disposal text be placed in a box.

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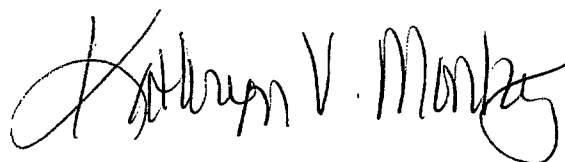
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Label Amendment – Storage & Disposal, Environmental Hazards, & Marketing Claims
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- 8) Note: Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Michael Walsh by phone at (703) 308-2972 or via email at walsh.michael@epa.gov.

Sincerely,



Kathryn V. Montague
Product Manager (23)
Registration Division, Herbicide Branch
Registration Division (7505P)

Enclosure

4097

ALL PRO PRODUCTS LAWN FOOD WITH MOSS CONTROL

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
MAY - 5 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

9240-8

Optional Marketing Statements:

- Kills lawn moss quickly!
- See results in hours
- Treats 5,000 sq. ft.
- With 7% iron
- Turns lawns a deep green
- No excess growth, less mowing!

ACTIVE INGREDIENT:

Ferrous Sulfate Monohydrate 25.8%

INERT INGREDIENTS:..... 74.2%

TOTAL..... 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> • 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.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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 SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	

See Back Panel for Additional Precautions

**NET WT. 20 LBS. (9.07 kg)
COVERS UP TO 5,000 SQ. FT.**

**NET WT. 40 LBS. (18.14 kg)
COVERS UP TO 10,000 SQ. FT.**

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ALL PRO PRODUCTS LAWN FOOD WITH MOSS CONTROL

GUARANTEED ANALYSIS

Spreader Settings	
Name of Spreader	Pounds of Product to Apply/1,000 sq. ft. Normal Feeding Heavy Moss Infestations

Kills Moss Fast
Gentle Greening for 8 Weeks
Non-Burning
Builds a Healthier Lawn that is Easier to Care For

ALL PRO Lawn Food with Moss Control contains a well-known moss control ingredient (iron sulfate) plus an all-natural lawn food blend. This fertilizer won't just feed the grass for today: It continues to feed your grass for up to 8 weeks.

Forget frequent feedings and surge fade greening. ALL PRO Lawn Food with Moss Control feeds your soil with the finest slow-release, natural, plant food ingredients.

Using ALL PRO Lawn Food with Moss Control season after season helps build strong roots that go deep. These deep roots encourage a thick, deep green turf in spring, helps them to find water in the hottest of summer weather, and results in turf that withstands winter weather.

BENEFITS:

- Has enhanced coverage because of micro-sized fertilizer particles.
- Low dust formulation because it's just a two-particle fertilizer.
- Contains 100% available nitrogen (no slow release)

APPLICATION PRECAUTIONS:

- Caution, product contains ferrous sulfate, which will stain sidewalks and cart paths.
- Clean hard surfaces after application.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Keep out of the reach of children. Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing of dust and contact with skin, eyes, or clothing. Causes moderate eye injury. Remove contaminated clothing and wash clothing before reuse. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not

predicted for the next 24 hours will help to ensure that wind can does not blow or wash pesticide off the treated area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems. 6097

DIRECTIONS FOR USE

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns.

USE PRECAUTION: Will stain paint or concrete. Remove spillage immediately by sweeping or washing off sidewalks, driveways or other concrete or painted surfaces. Use anytime moss is a problem. Repeat if needed. Rake lawn lightly to remove leaves and dead grass. Mow lawn to expose moss and to allow fertilizer to enter soil readily. Apply with spreader at recommended rates. WATER LAWN IMMEDIATELY AFTER APPLICATION.

NORMAL FEEDING

For normal control of moss, apply at the rate of four pounds per 1,000 square feet. A 20-pound bag covers 2,500 square feet; a 40-pound bag covers 5,000 square feet, properly applied. This application will provide turf with 1/2 pound of nitrogen, 1/3 pound of iron, per 1,000 square feet, plus phosphorus and potash essential to this early spring treatment.

HEAVY MOSS INFESTATIONS

For heavy infestations of moss, apply at the rate of eight pounds per 1,000 square feet. A 20-pound bag covers 2,500 square feet; 40-pound bag covers 5,000 square feet, properly applied. This application will provide turf with 1 pound of nitrogen, 2/3 pounds of iron per 1,000 square feet, plus phosphorus and potash.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store this product only in its original container in a dry, cool, secured storage area.

Container Disposal: If Empty: Nonrefillable container. Do not reuse or refill this container. If Partly Filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Spill: In case of spill, sweep up product and dispose of material according to "disposal" directions listed above.

(Optional storage and disposal statement – when sold for non-residential use.)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store this product only in its original container in a dry, cool, secured storage area.

Spill: In case of spill, sweep up product and dispose of material according to "product disposal" directions listed below.

Product Disposal: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures.

Empty Container Disposal: Do not reuse bag. Completely empty bag into application equipment. Dispose of empty bag(s) in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use and Storage and Disposal instructions. If the Conditions of Sale and Warranty are not acceptable, return the product unopened within thirty days of purchase to the place of purchase.

Conditions of Sale and Warranty: Seller warrants that this product consists of the ingredients specified and is reasonably fit for use as directed on the label. No one is authorized to make any other warranty, guarantee, or direction concerning this product. Because the time, place, rate of application and other conditions of use are beyond the Seller's control, Seller's liability from the handling, storage and, use of this product is limited to replacement of product or refund of purchase price.

**Manufactured By
Wolfkill Feed & Fertilizer Corp.
P.O. Box 578 Monroe, WA 98272**

**EPA Reg. No. 9240-8
EPA Est. No. 9240-WA-1**