

84524-2

09/10/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Matthew Brooks
Ag-Chem Consulting LLC
c/o Itronics Metallurgical, Inc
12208 Quinque Ln
Clifton, VA 20124

SEP 10 2008

Dear Mr. Brooks:

Subject: Labeling Amendment to Gold n Gro Guardian Deer Repellent
EPA Registration No. 84524-2
Submission Date: July 31, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact Jennifer Gaines at (703) 305-5967.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JH", written over a horizontal line.

John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

GOLD'n GRO® Guardian Deer Repellent

Repels deer from feeding on conifers, shrubs, deciduous trees, flowers and other ornamental plants,

ACTIVE INGREDIENT:

Denatonium benzoate: Benzyldiethyl [(2,6 xylyl carbamoyl) methyl] ammonium benzoate0.2%

OTHER INGREDIENTS:..... 99.8%

TOTAL: 100.0%

Contains 0.017 lbs (7.76 gms) of active ingredient per gallon.

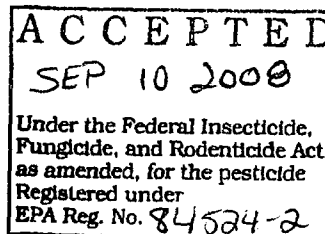
KEEP OUT OF REACH OF CHILDREN

CAUTION

(See other panel for additional precautionary statements.)

Net Contents: 1 gallon

EPA Reg. No. 84524-2
EPA Est. No. 84524-NV-001
84524-NV-002



PRECAUTIONARY STATEMENTS
Hazards to humans and domestic animals

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID
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.
<p>Have the product containers or labels with you when calling a poison control center or doctor, or going for treatment. Contact 1-800-858-7378 for emergency medical treatment advice.</p>

ENVIRONMENTAL HAZARDS

For terrestrial use only. Keep out of lakes, streams or ponds. Do not apply directly to water, in areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water, food or feed by cleaning equipment or waste disposal.

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may be used to discourage deer (*Odocoileus* spp.) from feeding on shrubs, ornamental plants, conifers, and nonbearing deciduous trees. Use this product only at ambient temperatures between 40° F and 90° F. Where deer pressure is high, consider other abatement options including fencing. Do not use on food or feed crops.

Do not apply aerially. Do not apply product through any type of irrigation system or hose proportioner applicator. Do not apply directly to or where product might drift onto stone, concrete or siding as staining might occur. Apply only for sites, pests, and application methods described on this label. Gold N Gro Guardian® has been tested on many species of ornamental plants and is believed not to be generally phytotoxic. Nevertheless, it is advisable to test the product on types of plants that might be especially sensitive by treating and observing small portions of the plant before treating the entire plant.

APPLICATION DIRECTIONS: This product is ready-to-use. Do not dilute. Shake container well before using product. Apply Gold N Gro Guardian® directly using the squeeze trigger applicator. If the container lacks a squeeze trigger, transfer product to any pump-type sprayer equipped with a cone or flat fan nozzle. Adjust nozzle to obtain even coverage. Apply only to dry plants. Hold spray tip 1 to 2 feet from plants to be treated and spray leaves, needles, buds, branches and trunks subject to browsing by deer. Thoroughly wet treated surfaces but do not apply to the point of significant spray run-off. For small shrubs such as global arborvitae 20-20" high, approximately 4-5 plants can be treated with the contents of a 1-quart container. Less product per plant will be needed for treating smaller, or less densely foliated plants; larger, heavily foliated plants will require greater amounts of product. Repeat treatments if deer damage resumes. In Spring, apply to buds, sprouts, stems, and unprotected foliage, as new growth appears. In Fall, apply to needles, bare branches and trunks after first frost.

APPLICATION RATES

Plant	Size	1 Gallon Covers
Flowers	15-20" tall	80-100 plants
Hosta and low ornamental plants	24" wide	15 plants
Tree, large	Treated to 5' Tall	17 trees
Tree (pyramid shaped)	15" to 18" tall	77 trees
Shrub (evergreen or broadleaf)	24" x 24"	30 shrubs
Seedling	6" – 8" tall	1,000 seedlings

If used in tank mix with fertilizer, five gallons of this product makes 20 gallons of finished spray solution (after mixing with one gallon of GOLD'n GRO 8-8-8 + 4%S and 14 gallons of water). Apply as above.

CLEAN APPLICATION EQUIPMENT IMMEDIATELY BEFORE SPRAY DRIES.

PESTICIDE STORAGE:

Store only in original container in a cool, dry area inaccessible to children and pets. Do not store in direct sunlight. Protect from freezing and heat. Keep container tightly closed to prevent evaporation.

PESTICIDE DISPOSAL:

Promptly discard leftover spray according to label directions. Rinsates resulting from use of this product may be disposed of by watering plants, or disposed at an approved waste disposal facility.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then dispose of in a sanitary landfill, or incinerate, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NOTICE: To the extent allowed by law, Itronics Metallurgical, Inc. makes no express or implied warranties of fitness or merchantability or any other kind whatsoever, except that the product conforms to the specifications on the label and is reasonably fit for the uses described. To the extent allowed by law, Itronics Metallurgical, Inc.'s sole liability on the warranty is limited, at Itronics Metallurgical, Inc.'s discretion, to replacement of the defective product or return of the purchase price paid for the defective product. Under no circumstances shall Itronics Metallurgical, Inc. be liable for incidental, consequential or special damages. The buyer assumes all risks and liability resulting from the use of this product, whether used singly or in combination with other good. Itronics Metallurgical, Inc. neither assumes, nor authorizes any person to assume for it, any other liability in connection with the sale or use of this product.

Manufactured by:
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