U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES

ADDRESS (EPA Regional Office): Kansas City, Kansas

DATE: January 8, 2008

NAME OF INDIVIDUAL: Robert Applegarth

TITLE: Plant Manager

FIRM NAME: Greenleaf, LLC

ADDRESS (Street, City, State and Zip Code): 13960 Palm Road, Neosho, Missouri 64850

SAMPLE NUMBERS: 010808F184201 01, 010808F184201 02 & 010808F184201

SAMPLES COLLECTED (Describe fully. List Registration, Lot, Batch, Model, Serial Numbers and other positive identifications.)

The following samples were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged persuant to Section 9.(a) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 g). This section is quoted on the reverse of this form.

010808F184201 01 - One pint bulk pesticide formulation sample of Greenleaf Fertilizer with Weed Control, EPA Reg. No. 83893-1.

010808F184201 02 - One pint bulk pesticide formulation sample of Greenleaf Fire Ant Killer & Preventor Bait, EPA Reg. No. 83893-6.

010808F184201: (Documentary Evidence) Digital Photographs

Bin Labels, as follows:

	EPA Reg. No.
Greenleaf Fertilizer with Insect Control	83893-22
Greenleaf Lawn & Garden 5% Dust	83893-9
Greenleaf Insecticide Granules	83893-12
Greenleaf Lawn Fertilizer with Crabgrass Protection	83893-24
Greenleaf Lawn Fertilizer with Crabgrass Preventor	83893-23
Greenleaf St. Augustine Lawn Weed & Feed	83893-8
Greenleaf Long Lasting Insect Killer	83893-?
Greenleaf Lawn & Garden Insect Control	83893-4
Greenleaf Lawn & Garden 10% Dust	83893-10
Greenleaf Lawn Insect Killer Granules	83893-3
Greenleaf Fast Kill Fire Ant Mound Destroyer	83893-7
Greenleaf Fertilizer with Weed Control	83893-1
Greenleaf Fire Ant Killer & Preventor Bait	83893-6
Greenleaf Weed & Feed	83893-15
Greenleaf Weed & Feed II	83893-16
Greenleaf Lawn Fertilizer with Summer Insect Protection	83893-17
Greenleaf Lawn Fertilizer with Moss Control	83893-25
Greenleaf Lawn Insect Killer	83893-21
Greenleaf Lawn Fungus Control	83893-13
Greenleaf Lawn Fertilizer with Weed Control	83893-2
Greenleaf Lawn Insect Control	83893-11
Greenleaf Lawn & Soil Insect Killer	83893-5

ACKNOWLEDGMENT OF PRODUCER/REGISTRANT

The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled, and released for shipment.

SIGNATURE (Owner, Operator, or Agent): Robert Applegarth

TITLE (Owner, Operator or Agent): Plant Manager

[X] DUPLICATE SAMPLES REQUESTED AND PROVIDED [X] DUPLICATE SAMPLES NOT REQUESTED

SAMPLES WERE [ ] PURCHASED [X] BORROWED

AMOUNT PAID FOR SAMPLES: $ N/A [ ] CASH [ ] VOUCHER [ ] TO BE BILLED

NAME OF COLLECTOR (Print or type): Gary J. Steiner

TITLE OF COLLECTOR: Investigator

SIGNATURE OF COLLECTOR: Gary J. Steiner

EPA Form 3540-3 (Rev. 8-75) PREVIOUS EDITION TO BE USED UNTIL SUPPLY IS EXHAUSTED.

ESTABLISHMENT COPY

- STOP SALE ORDER ON 41 ITEMS AND/OR CONTAINERS CAN NOT BE SOLD, USED, OR REMOVED FROM BUILDING. WOULD NEED WRITTEN PERMISSION FROM EPA TO PLACE IN DIFFERENT CONTAINERS
  - STOP SALE ON ABOUT 22,000 lbs (11 TON) OF ASSORTED CONTAINERS.
  - PLUS Approx 10 TON FLEA+Tick GRANULES IN PIT
  - PLUS Approx 25 TON FERTILIZER WITH WEED CONTROL IN PIT
  - PLUS ONE GAL LIQUID WEED KILLER

- MEN'S FOCUS - MOVING STOP SALE ITEMS OUT OF STORE INTO SECURE REMOTE CORNER OR SEGREGATED AREA.
- GETTING BAGS AND PROCESS GOING AT PINEVILLE TO HAVE SELLABLE PRODUCTS LIKE CHARCOAL AND POTTING SOIL READY TO SELL. (NONE OF OUR LARGE VOLUME POTENTIAL BUYERS REALLY WANT ANY STOP SALE ITEMS) OVERSTOCK FREIGHT, TIM WITH SSS, ETC.
- FIND ALL AVAILABLE FERTILIZER WITHOUT HERBICIDES TO FILL PRE PAID FERTIZER ORDERS.
- GET LABEL AND PERMIT PROCESS FOLLOWED THROUGH SO CAN START SELLING ITEMS THAT WEREN'T LABELED PROPERLY.

- MINDY SHOULD HAVE KNOWN AND TOOK ACTION ON:
  - PESTICIDE MEANS HERBICIDE
  - LIQUID CONTAINERS MUST BE TRIPLE RINSED
  - "WEED AND FEED" FERTILIZER CAN'T BE BLENDED w/multiple types
  - NO ONE IN OPERATIONS KNEW CSF (CONFIDENTIAL STATEMENT OF FORMULA showing what WALMART BRAND WENT INTO WHAT GREENLEAF BRAND

- NOTES
  - MAYBE IRRELEVANT - BUT USDA EPA GUYS FELT DAVID HARSH WAS MORE OF A RCRA THAN A FIFRA ENVIRONMENTAL GUY.
  - USDA/EPA SAID WHEN THEY LEFT THAT THEIR REPORT WOULD INDICATE A HIGH LEVEL OF COOPERATION AND THAT WE HAD DEMONSTRATED AN INTEN TO DO OPERATIONS IN A LEGAL MANNER.

STATEMENT

I, Robert Applegarth, under affirmation say:

I am Plant Manager of Greenleaf, LLC of Neosho, Missouri and I am responsible for all of the daily activities of the firm. Greenleaf is a wholly owned division of Roll-Off Services, Inc. of Lowell, Arkansas. My Sup is Tom Smith of Roll-Off Sev. I have been employed by Greenleaf for only three months serving as Plant Manager here for all of this time. Greenleaf also operates from a leased warehouse in the Crowder Industrial Park in Neosho and from a leased bagging an warehouse facility in Pineville, Mo. Greenleaf also has facilities located in Gen Ar. and in Fayetteville, Ar. Pesticides are stored at both Neosho facilities and at Pinevil

To the best of my knowledge Greenleaf has operated at its current location at 139 Palm Road, Neosho, Mo. since January, 2007. Greenleaf is a processor and distrib of damaged merchandise from Walmart, Inc. lawn and garden centers. Walmart is o only customer or source of damaged goods. Greenleaf buys damaged product bird seed, fertilizer, seed and pesticides from Walmart. When we began receiv damaged pesticides in early 2007 from Walmart we almost immediately received 76 to leads of damaged products from Walmart return centers. The return centers located in Bentonville, Ar, Indianapolis, In., Las Vegas, Nv, Waco, Tx, Macon, Ga. Johnstown, NY. The Greenleaf business plan was to buy damaged products from W remove the products, including pesticides from the original packaging and sell or distr those products under Greenleaf packaging and labeling, as well as in bulk. I estimate Greenleaf has received at least 3,400,000 pounds of pesticides from Walmart re centers, since we started business operations in Neosho about one year ago. I estim about 1,000,000 pounds were insecticides and about 2,400,000 pounds were herbicide with a relatively small amount of fungicides. Greenleaf kept no detailed records receipt of these pesticides. Copies of Greenleaf Incoming Shipment Check-In Sh Form were provided to Gary Steiner. Greenleaf intends to re-bag the dry pesticid from the original market containers and repackage the pesticides into Greenleaf labeled c registered pesticide packaging. Our contract with Walmart requires us to remove all pro including pesticides from the original packaging before re-sale. I estimate Greenleaf has sold less than 1000 pounds insecticide ~~that~~ from products after repackaging, and from 800 1,000 tons of herbicide products repackaged under Greenleaf labels and registration.

I hereby affirm that the above is true to the best of my knowledge.

Signature: Robert Applegarth Title: Plant Manager

Date: January 8, 2008

Firm Name: Greenleaf, LLC
Address: 13960 Palm Road
City: Neosho
State: Missouri Zip Code: 64850

Signature of Witness: Gary J. Steiner

STATEMENT

I, Robert Applegarth, under affirmation say:

Greenleaf, LLC does not maintain accurate pesticide inventory records. I belie
we have over 1,800,000 pounds of dry pesticides and from 20 to 25 /55 gallon
drums of liquid pesticides on current inventory. Most of the dry pesticides
have not yet been de-bagged or repackaged into Greenleaf labeled product.
have already disposed of 38 /55 gallon drums of liquid pesticides. I believe Greenleaf
sold and distributed from 800 to 1000 tons of dry herbicide products under Gre
labeling. We did not intend to take in liquid pesticides, but some inadvertently w
received. We intend to dispose of the remaining 20 to 25 drums of liquid pestici

Most of the pesticide inventory currently held by Greenleaf has not been de-bagged yet an
is not in salable condition. It is being held for re-work or repackaging into Greenleaf l
pesticide. Currently we have an inventory of about 30 pallets of repackaged and bulk pes
labeled with Greenleaf stickers, but no pesticide labeling. The 30 pallets are held f
sale and are released for shipment. Greenleaf has not maintained pesticide
batch or production records. We have maintained sales invoices pertaini
to shipments of Greenleaf repackaged and bulk pesticides under Greenleaf l
Copies of sales invoices were provided to Gary Steiner.

Typically Greenleaf repackages or re-bags debagged pesticides and only a small s
is applied to the bag for identification purposes. The entire Greenleaf label is ne
applied to re-bagged pesticide containers. When pesticides are sold the customer
given one copy of the entire Greenleaf pesticide label regardless the number
bags purchased. Bulk deliveries receive only one label. We do not list the ne
contents on the label. When Greenleaf gets its Pineville bagging facility in opera
our pesticide production practices should become more professional.

I am not knowledgeable of the EPA Registration numbers of our Greenleaf registered pe
because those numbers are not listed on the labels. I believe we have ten to 15 regis
I have no knowledge of the confidential statement of formula (CSF) cited by Greenlea
EPA in support of our pesticide registrations. I do not know if Greenleaf has
the CSF originally cited to EPA, according to the source or sources of active ingredient
any of the pesticides we have produced. Typically Greenleaf labeled pesticides are des
from bulk quantities of de-bagged pesticides of similar active ingredient sourced fro
multiple brands and registrations. I am aware if Greenleaf has permission from the
of those products to use them to produce Greenleaf labeled pesticides.

I hereby affirm that the above is true to the best of my knowledge.

Signature: Robert Applegarth Title: Plant Manager

Date: January 8, 2008

Firm Name: Greenleaf, LLC
Address: 13960 Palm Road
City: Neosho
State: Missouri Zip Code: 64850

Signature of Witness: Gary J. Steiner

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STATEMENT

I, Robert Applegarth, under affirmation say:

we currently have an inventory of approximately 35 tons of unpackaged or bulk fertilizer blended with herbicide in a bulk bin. The herbicide product is held for sale either in bulk quantities or bagged, according to customer order. We have sold and are offering this material for sale under Greenleaf Fertilizer with weed Control labeling. The 25 tons of product are derived from literally hundreds of individual bags or retail consumer containers my employees dumped in the bulk bin. The bin contains comingled herbicide/fertilizer from hundreds of bags of Scotts Turf Builder with Plus 2 Weed Control, EPA Reg. No. 538-282, Expert Gardener Winterizer Weed & Feed, EPA Reg. No. 2217-827-538, and likely several other different herbicides registrations that were dumped or de-bagged by my employees into the bin. Greenleaf has sold and distributed this pesticide under EPA Reg. No. 83893-1. Greenleaf labeling was provided to Gary Steiner. This bulk herbicide product is currently held for sale.

Greenleaf has a similar large pile or bulk inventory of granular insecticide of approximately 10 tons. Greenleaf employees de-bagged hundreds of bags of Ortho Max Insect Killer for Lawns, EPA Reg. No. 279-3240-239, Scotts Grub Ex, 432-1339-538, Garden Tech Sevin Lawn Insect Granules, 432-1212-71064, Eliminator Ant, Flea & Tick Killer Granules, 28293-329-55144, and possibly other insecticide products and dumped the insecticide granules in a comingled pile in the bulk bin. Greenleaf sold and distributed these granules under Greenleaf Fire Ant Killer & Preventer Bait. I do not know the EPA registration number of the Greenleaf product. I have provided Gary Steiner with Greenleaf labeling for this product. It is currently held for sale and distribution.

I do not know if the pesticides Greenleaf employees de-bagged, comingled and re-bagged and/or distributed in bulk for sale under the two Greenleaf pesticides described above were produced in compliance with the CSF information provided to EPA in applications for the Greenleaf EPA registrations.

All of the pesticides sold by Greenleaf since ~~January~~ Julyish 2007 were sold and distributed under Greenleaf labeling, except for liquid Roundup herbicide. Almost all of the liquid pesticides received from Wal Mart were disposed of, but the Roundup was depackaged and sold without labeling. Greenleaf employees poured Roundup from small containers of one gallon or less into unlabeled containers of one gallon or less for sale, according to customer needs. We used one gallon milk jugs or whatever was available. Sales invoices provided to Gary Steiner for these distributions listed Roundup, 15% weed Killer, 51% weed Killer or weed Control.

I hereby affirm that the above is true to the best of my knowledge.

Signature: Robert Applegarth Title: Plant Manager

Date: January 9, 2008

Firm Name: Greenleaf, LLC

Address: 13960 Palm Road

City: Neosho

State: Missouri Zip Code: 64850

Signature of Witness: Gary J. Steiner

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Stat.form 11/96

01-08-08 NOTES FROM EPA/DEPT OF AGRICULTURE INSPECT

ISSUES: LACK OF PRECISE, ACCURATE INCOMING SHEET LOGS SHOWING TOTAL WEIGHT OF EACH ITEM BY BRAND, EPA REG #, PRODUCT, AND TOTAL WEIGHT OF EACH GROUP OR TYPE. NEEDS DONE WHEN UNLOADING!

ROBERT NEEDS TO KNOW CONFIDENTIAL STATEMENT OF FORMULA (CSF) FOR EACH PESTICIDE PRODUCT SO THE CSF CAN BE FOLLOWED. (IN LAYMAN'S TERMS - WHAT BRAND NAME AND EPA # MATCHES GREENLEAF BRAND)

NO BATCH, PRODUCTION, INVENTORY RECORDS.

LABELS, PRODUCT DESCRIPTIONS, WARNING LABELS, USAGE AND DOSAGE DIRECTIONS INSUFFICIENT.

"BLENDING" OF products with diff. EPA Reg # WRONG (EVEN WHEN SOLD IN BULK)

"PESTICIDE", BY EPA DEFINITION IS ANY MATERIAL THAT CONTROLS, KILLS ANY LIVING ORGANISM

EPA

NOTICE

of

The pesticide(s) or device(s) Ant, Flea & Tick Killer, 2/2 to 3 lb. bags,
(Describe fully, List Brand Name, Amounts, Registration,

No Lot No. No label or EPA Reg. No. and other pesticides
Lot, Branch, Model, Serial Numbers and other positive identification)
on the attached list below:

is subject to a STOP SALE, USE or REMOVAL ORDER issued by the **UNITED STATES ENVIRONMENTAL PROTECTON AGENCY** in accordance with the provisions of Section 13(a) of the Federal Insecticide, Fungicide, and Rodenticide Act and MUST NOT BE SOLD, USED or REMOVED other than in accordance with the order issued to: Greenleaf, LLC, 13960 Palm Road, Neosho, Missouri 64850

WARNING

The sale, use, or removal of this product in violation of the order is punishable by fine or imprisonment or both as prescribed in Section 14 of the Federal Insecticide, Fungicide, and Rodenticide Act.

SIGNATURE OF EPA OFFICIAL	DATE
Dick Wiechman	1/9/08

FOR ADDITIONAL INFORMATION CONCERNING THIS NOTICE, CONTACT THE PERSON BELOW

NAME, TITLE, AND PHONE NO.	ADDRESS
Dick Wiechman Missouri Project Officer Phone (573) 636-5223	U.S. Environmental Protection Agency WWPD/PEST 901 N. 5th Street Kansas City, KS 66101

EPA FORM 3540-27 (Rev. 01-01)

Greenleaf, LLC

SSURO List

Amount		EPA Reg No
Bulk-Approx. 25 Tons	Greenleaf Fertilizer with Weed Control	83893-1
Bulk Approx 10 Tons	" Fire Ant & Preventer Bait	83893-[illegible]
Bulk-About 8 lbs.	" Kills Dolar weed	unknown
Bulk-About 2/100 lb.	Yard Granules	"
Bulk-About 1 pallet/80 lbs	Grub Control II	"
Bulk-About 1 pallet/250 lbs	Grub Control [redacted] I	"
1/2 lb.	Flea & Tick Carpet Powder	"
1/5 lb.	Greenleaf Gopher Begone	"
3/27 lb.	Greenleaf Broadleaf weed Stopper	"
1/30 lb	" Ant, Flea & Tick Killer	"
2/25 lb + 1/2 lb pails	Ant, Flea & Tick Killer	"
Bulk-About 7 lbs	Crabgrass Stopper	"
Bulk About 250 lbs	Triple Play Fertilizer and Weed Killer	"
Bulk-About 100 lbs	Broadleaf Weed Preventer	"
Bulk About 300 to 400 lbs	Yard Fungus Control	"
Bulk-About 200 lbs	" Fungus Begone	"
Bulk-About 250 to 300 lbs	Fertilizer with Moss Control	"
Bulk-About 2700 lbs	Grub Control	"
Bulk-About 3000 lbs	Grub Control	"
30/30 lb bags	Greenleaf Ant, Flea & Tick Killer	"
Bulk-About 2750 lbs	Crabgrass Preventer	"
Bulk-About 1900 lbs in 2 pallets	All Purpose Insect Killer	"
Bulk-About 750 lbs	Low Nitrate Weed & Feed	"
Bulk-About 250 lbs.	Control of Diseases Lawn Fungicide	"
Bulk-About 1500 lbs	Fall Weed & Feed	"
Bulk-About 750 lbs	Lawn Fungus Control	"
Bulk-About 650 lbs	Weed Preventer Granules	"
Bulk About 3000 lbs	Ant, Flea & Tick Killer	"
Bulk-About 600 lbs	22-2-2 with Moss Control	"

Bulk-About 450 lbs.	Broadleaf weed Preventer	"
Bulk About 800 lbs	5% Insect Dust	"
Bulk-About [redacted] 700 lbs	Ant, Flea & Tick Killer	"
Bulk-About 50 lbs	Snail & Slug Killer 1	"
Bulk-About 2/50 lb trays	Snail & Slug Killer 2	"
Bulk-About 5 lbs	Bug Bait	"
Bulk-About 200 lbs.	10% Dust	"
1 gallon jug	Greenleaf 50% Weed Killer	"
4/5 lb bags	Snail & Slug Killer	"
8/5 lb & 2/10 lb bags	5% Insect Dust	"
Bulk-About 25 lbs	Fire Ant [redacted] Killer	"

Gary J. Stern 1/9/08