

Jackie DiMaggio
 Chevron Chemical Company
 Ortho Consumer Products Division
 940 Hensley Street
 Richmond, CA 94804-0036

MAY 21 1984

Dear Ms. DiMaggio:

Subject: Amendment-Label Revisions
 Ortho Ready-Mixed Contax Weed and Grass Killer
 EPA Registration No. 239-2394
 Your Submission of May 4, 1984

The amendment referred to above, submitted in connection with registration under FIFRA is acceptable, provided that you:

1. Make the labeling changes listed below before you release the product for shipment:
 - a. Modify your Hazard to Humans and Domestic Animals section to include the statements "Harmful if absorbed through skin" and "Keep children and animals off treated areas until this material has been washed into soil" (simply waiting until substance has dried is not sufficient to reduce inadvertent exposure). You must also reinstate an inhalation statement such as "Avoid breathing vapors."
 - b. Delete soil sterilization statement or revise to read "Will not sterilize soil."
 - c. Under Environmental Hazards, add "Do not contaminate water by cleaning of equipment or disposal of wastes."
2. Submit one copy of your final printed labeling before you release the product for shipment.

We have the following comments on your data requirements matrix:

1. Product Chemistry. Storage stability testing is incomplete as you have noted. Corrosion characteristics testing is required on all materials coming into contact with metal, plastic or paper containers (refer to Guidelines References, Subdivision D).

CONCURRENCES

		CONCURRENCES						
SYMBOL ▶								
SURNAME ▶								
DATE ▶								

2. Acute Toxicology. In most cases we would not consider a product with a much higher percentage of active ingredient a "substantially similar" product. Because the acute toxicity of The Contax Weed and Grass killer is category III-IV, the composition (inert and active ingredients) of the two formulations is essentially identical, and the Ready Mixed product simply is a less concentrated mixture diluted with water, we would consider data on the concentrated product appropriate for the ready mixed version. We would also accept your rationale for not providing dermal sensitization data. Since packaging/dispersal of material precludes mixing and repeated skin contact, this testing is not necessary.

The submitted data have been assigned Accession Numbers as follows:

- Acute Toxicology, Vol. 1 - #253231
- Acute Toxicology, Vol. 2 - #253232
- Product Chemistry, Vol. 1 - #253233
- Product Chemistry, Vol. 2 - #253234

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

Sincerely yours,

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

Enclosure

RD/FHB:DCR-32287:Mountfort:pac:Raven:557-2226:RD-17:5/17/84:Del.5/31/84

ORTHO

Ready-Mixed CONTAX® Weed & Grass Killer

PRECAUTIONARY STATEMENTS ← 10pt.
HAZARDS TO HUMANS & DOMESTIC ANIMALS
 → **CAUTION:** Causes eye irritation. ~~Avoid contact with eyes.~~ Keep children and animals off treated areas until these areas are dry. **STATEMENT OF PRACTICALITY** ← 10pt.
TREATMENT: In case of eye contact, wash eyes immediately with fresh water for at least 15 minutes. See a doctor if irritation persists. **Note to Physicians:** Emergency Information - call (415) 233-3737.
ENVIRONMENTAL HAZARDS ← 10pt.
 Do not apply directly to water.

DIRECTIONS FOR USE
 It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTION.**

ORTHO Ready-Mixed CONTAX Weed & Grass Killer is a non-selective, ready to use herbicide that top kills weeds and grasses on contact. Its phytotoxic properties are quickly inactivated on contact with soil. Using the self contained applicator cap, apply as directed to control unwanted vegetation around trees, shrubs, buildings, in brick and gravel walks, patios and along fences, sidewalks, drive-

ways, curbs and gutters. Will not stain gravel or paved areas.

WHEN TO APPLY: ORTHO Ready-Mixed CONTAX Weed & Grass Killer can be applied anytime during the growing season, but best results are obtained during warm sunny weather when applied to actively growing unwanted vegetation. Sunlight and temperatures above 80° F. accelerate the destruction of treated vegetation. To avoid drift to desirable plant foliage, apply only when air is calm. Heavy lawn grass and difficult to control perennial weeds such as barnyardgrass and dallisgrass will require more than one application to give complete control of top growth.

HOW TO APPLY: Remove cap from applicator head and be certain that applicator head is screwed firmly on jug. Invert jug and apply product to thoroughly cover unwanted vegetation. The width of the spray pattern may be adjusted by either raising or lowering the jug.

For top killing vegetation around trees, shrubs and buildings and edging around lawns, fences and sidewalks, hold the jug about 2 to 6 inches from the area to be treated depending upon desired width.

For controlling weeds in brick and gravel walks and patios and in other unconfined areas, hold jug at about waist height away from body to avoid contact with skin or clothing. Walk slowly making sure that all undesirable plants are thoroughly covered with spray. Apply 1 gallon to 200 square feet. For spot treating or retreating missed areas, hold jug so that spray hits only the weed or area to be treated.

Under warm sunny conditions wilting will occur in 1 to 3 days and complete browning in 5 to 7 days.

IMPORTANT: To avoid drift that may injure desirable plants, do not apply during windy weather. Make sure that spray does not contact the leaves, green bark, bud crowns or broken bark on trees and ornamentals. Do not apply on or around plants to be used for food or feed.

Do not track from treated areas to untreated areas.

STORAGE AND DISPOSAL
STORAGE: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area.

DISPOSAL: PRODUCT - Partially filled bottle may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash. **CONTAINER** - Do not reuse empty bottle. Rinse thoroughly before discarding in trash.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Chevron Chemical Company
 Ortho Division/San Francisco CA 94119 Richmond CA 94804
 Product 5176 Made in U.S.A.
 R Form 8304-C
 EPA Reg. No. 239-2394-AA

ORTHO
**Ready-Mix
 Weed & Grass Killer**

TOP KILLS: Weeds and
 Around Trees, Shrubs,
 Driveways, Fences
 Will Not Sterilize Soil
 Directions.

CONVENIENT

CONTAX

PREPARED BY

CHEVRON CHEMICAL COMPANY

UNTIL AUGUST 1984

ACCEPTED
 with comment
 21 1984
 239-2394

Active Ingredients
 Sodium Dimethylarsinic Acid
 Dimethylarsinic Acid
Inert Ingredients
 Total Arsenic as Element
 Dimethylarsinic Acid
 *Sodium Sacodylate

Keep out of reach of children
CAUTION ← 14pt.
 See side panel for additional information

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