

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. William Metzger Chemsico, Div. of United Industries Corp. P.O. Box 142642 St. Louis, MO 63114-0642 JUN 25 2010

Subject: Label Amendment Responding to EPA Letter of March 8, 2010 EPA Reg. No. 9688-133; Chemsico Green 'N Weed 15-15-15 Your Submission Dated March 29, 2010, as Amended by Email April 19, 2010

Dear Mr. Metzger:

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

- 1. In the listing of Trees under "WHERE TO APPLY" (label Format B only), delete the phrase "such as" and change "Apple" to "Apple (non-bearing only)".
- 2. In the listing of Shrubs under "WHERE TO APPLY" (label Format B only), delete the phrases "such as" at the beginning of the list and "and more" at the end of the list.
- 3. The following statements under the heading "Use Tips" in column 1 of the last page of the label (label Format B) are mandatory directions, restrictions or precautions. As such, they are not merely advisory, as implied by the heading. Therefore, these statements must be removed from the "Use Tips" section and placed near the beginning of the Directions for Use or elsewhere in the Directions for Use under the heading "Restrictions and Precautions":
 - "Use [Chemsico Green 'N Weed 15-15-15] in *established* flower and vegetable gardens. Applying to newly planted flower or vegetable seeds will prevent seeds from [germinating] [growing] [starting] [sprouting]. [Chemsico Green 'N Weed 15-15-15] [this product] may be applied to soil before or after setting transplants."
 - "Do not apply when plant foliage is wet and use care not to allow treated soil to contract foliage."
 - "When starting your garden from seeds, treat 10 weeks before planting."
 - "Gladiola corms less than 1 inch in diameter may be injured by pre-plant application."

- "When using on ASPARAGUS, treat after ferns are removed, but before the spears appear."
- 4. There are several inappropriately hyphenated words throughout the label. This appears to have resulted from changes in word "wrapping" within the columns when the format was changed from 3 to 2 columns per page. Please remove the hyphens from the following words:
 - "gar-dens" in the middle of the first paragraph, column 1, page 1.
 - "Car-rots" in the second-to-last row of column 2, page 1.
 - "pre-pare" in the second-to-last row of column 1, page 2.
 - "Cab-bage" in the instructions "BEFORE TRANSPLANTING" under "FOR VEGETABLES" in column 2, page 2.
 - "Hon-eysuckle" in the listing of "SHRUBS" under "WHERE TO APPLY" in column 1, page 3.
 - "Wire-vine" in the "GROUND COVER" listing under "WHERE TO APPLY" in column 1, page 3.
 - "indi-cated" and "contain-ing" in item 3 of the directions "FOR VEGETABLES", near the top of column 1, page 4.
 - "germinat-ing" in the first bullet ($\sqrt{}$) under "USE TIPS" in column 1, page 4.
 - "grow-ing" in the second bullet ($\sqrt{}$) under "USE TIPS" in column 1, page 4.

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after eighteen (18) months from the date of this letter or the next printing of the label, whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,

Kathryn Montague Product Manager 23

Herbicide Branch

Registration Division (7505P)



GREEN 'N WEED

15-15-15

[Easy top-dispensing canister · Plant food plus weed [preventer] [guard] [control] · Feeds plants and prevents weeds for 3 months · Provides [up to] 3 months of control · Gives 3 months all weather protection · Lasts for 3 months · Provides weed prevention and contains 15-15-15 slow release plant food for fertilizing around your flowers, vegetables, roses, trees, shrubs and ground cover · Ideal for use in [planting beds] [flower gar-dens], vegetable gardens, around shrubs and trees · Stops weeds as they sprout · Stops weeds as they start, for larger and stronger plants [flowers] · Weed control plus long lasting time release plant food · Long lasting granules · Long lasting plant food · Contains slow release nitrogen and [&] potassium · Contains slow release plant food · Time-release granules · Slow-release granules · Feeds for 3 months · Won't harm established plants! · Not Affected by rain · Can't be washed away [in rain] · Won't wash away [in rain] · Treats a minimum of 160 sq. ft.]

ACCEPTED with COMMENTS In EPA Letter Dated: JUN 2 5 2010

Under the Federal In dicide.
Fungicide, and Rodernetide Act as amended, for the pesticide registered under EPA Reg. No.

9688-133

 Active Ingredient:
 0.74%

 Trifluralin
 99.26%

KEEP OUT OF REACH OF CHILDREN
CAUTION See back for additional precautionary statements

NET WT. 1 LB./453 g

(OPTIONAL MARKETING LANGUAGE)

[WHAT GREEN 'N WEED DOES:

Chemsico Green 'N Weed 15-15-15 is a dual action product that feeds with a quality plant food and at the same time prevents many broadleaf and grassy weeds from growing. Apply around listed flowers, roses, shrubs, trees and vegetables, for all season weed control without difficult and time consuming hand weeding. Without weeds to compete for nutrients and water, your valuable plants can grow larger and stronger.]

FORMAT A

WEEDS GREEN 'N WEED STOPS [PREVENTS]:

Annual bluegrass, barnyardgrass (watergrass), brachiaria, bromegrass, cheat, crabgrass, foxtail, goosegrass, Johnsongrass (from seed), junglerice, sandbur, stinkgrass, sprangle top, Texas panicum, wildcane, and these broadleaf weeds: Carelessweed, carpetweed, chickweed, Florida purslane (pusley), goosefoot, knotweed, kochia, lambsquarter, pigweed (spiny and redroot), purslane, Russian thistle, stinging nettle.

WHERE GREEN 'N WEED CAN BE USED:

[Around the following established flowers, roses, shrubs, trees and ground cover.] Do not apply to Ajuga, Myrtle or Pachysandra as injury may result.

FLOWERS – Achillea, African daisy, Ageratum, Arctotis, Aster (perennial), Balsam, Black-eyed Susan, Calendula, California poppy, Calliopsis, Carnation, Centaurea, Chrysanthemum, Coreopsis, Cornflower, Cosmos, Daffodils, Dahlia, Dianthus, Dimorphotheca, Dusty Miller, Floss flower, Forget-me-not, Four o'clock, Gaillardia, Gladiolus, Hollyhock, Impatiens, Ixora (Coccinea), Lobelia, Lupines, Marigold, Morning glory, Nasturtium, Nicotiana, Periwinkle, Petunia, Phlox, Portulaca, Roses, Rudbeckia, Salvia, Scabiosa, Shasta daisy, Snapdragon, Snow on the mountain, Stock, Sunflower, Sweet alyssum, Sweet pea, Sweet William, Tulips, Vinca, Yarrow, Zinnia.

SHRUBS – American arborvitae, American cherry laurel, Azalea, Barberry, Boxwood, Camellia, Cinquefoil, Common lilac, Cotoneaster, Deutzia, Elaeagnus, Euonymus, Forsythia, Holly, Honeysuckle, India, Hawthorn, Juniper, Mock-orange, Mountain laurel, Pieris japonica, Pineapple guava, Privet, Pyracantha, Rhododendron, Robinia, Sakaki, Spirea, Viburnum, Weigela Bristol ruby, Willow, Yew.

TREES - Apple (non-bearing only), Bald cypress, Balsam fir, Black gum, Black locust, Black walnut, Canada hemlock, Chinese chestnut, Cottonwood, Dogwood flowering, Douglas fir, European white birch, Honey locust, Japanese larch, London planetree, Maple, Oak, Pine, Redbud, Spruce, Colorado blue spruce, Stonefruits, Sweetgum, Sycamore, Tuliptree, White ash

GROUND COVER – Aaronsbeard, Asparagus fern, Bellflower (Adriatic), Big blue lilyturf, Bunge, California ivy, Ceanothus, Coreopsis, Cotoneaster, Crown vetch, Daisy trailing African, Dwarf coyote brush, Dwarf Peter Pan, Gazania, Germander, Largeleaf ice plant, Ivy (Algerian), Ivy (English), Rose of Sharon, Rosemary, Rupturewort, Snow-in-Summer, Speedwell, St. Johnswort, Stonecrop (Sedum), Strawberry (beach), Thrift-sea-pink, Tickseed, Verbena, Wire-vine (creeping), Yarrow (woolly), Zoysiagrass.

VEGETABLES – Asparagus (Established) Beans (Lima, Snap), Broccoli, Brussels sprouts, Cabbage, Cantaloupe, Car-rots, Cauliflower, Celery, Collard, Cucumber, Greens (Mustard, Turnip), Kale, Okra, Peas (Green, Southern), Peppers, Potato, Tomatoes, Watermelon.

GUARANTEED ANALYSIS

Total Nitrogen (N)	15%
3.0% Ammoniacal Nitrogen	
8.86% Urea Nitrogen*	
3.14% Nitrate Nitrogen**	
Available Phosphate (P2O5)	15%
Soluble Potash (K ₂ O)***	15%
Sulfur (S)	
3.5% Free Sulfur (S)	

Primary plant food derived from: Ammonium Phosphate, Sulfur Coated Urea, Muriate of Potash and Polymer Coated Potassium Nitrate.

*8.86% slowly available urea nitrogen from sulfur coated urea. **3.14% controlled release nitrogen from polymer coated potassium nitrate. ***11.25% controlled release potash from polymer coated potassium nitrate.

1074-2013

STOP! READ ENTIRE LABEL BEFORE USE. DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For outdoor use around the home only.



ENTRY RESTRICTIONS: Do not allow people or pets to enter the treated area until dusts have settled. If watering-in is required after the application, do not enter or allow others to enter the treated areas (except those involved in the watering) until the watering-in is complete and the surface is dry.

APPLICATION RESTRICTIONS: Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.

USER SAFETY RECOMMENDATIONS: Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

WHEN TO APPLY

Apply as early as possible in the growing season to take advantage of the season-long weed control. You may apply around established flowers, roses, shrubs, trees and ground cover any time prior to setting transplants. Do not use on flower seeds, lawns or enclosed areas such as greenhouses. For best results, carefully follow directions.

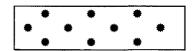
HOW TO APPLY

Since this product doesn't kill weeds but prevents them from appearing, first remove all existing weeds and cultivate to pre-pare a smooth soil surface.

Break the seal and open the pop-top. Evenly sprinkle over area to be treated.

FOR ROSES, FLOWERS, SHRUBS, TREES AND GROUND COVER

When applying around established plants or plants that are 2 to 3 inches tall, sprinkle evenly around each plant matching the picture shown. Do not use with flower seeds. Do not treat when foliage is wet. Lightly water into soil after applying. Re-apply every three months for continuous feeding and weed prevention.



APPLICATION RATE 1 lb, treats 160 sq. ft.

When applying before setting transplants, sprinkle evenly over the ground matching the picture shown. Gently rake in. Lightly water in after transplanting.

Gladiola corms less than 1 inch in diameter may be injured by pre-plant application.

FOR VEGETABLES

Use this two-way product as both a weed control and plant food around the vegetables listed below. Remove all weeds, then lightly cultivate to prepare a smooth soil surface. When planting seeds treat 10 weeks before planting. You can treat any time prior to transplanting plants. Rate of application depends on the type of soil you have. Apply 1 lb. per 320 sq. ft. (16 ft. x 20 ft.) for heavy clay type soils and 1 lb. per 640 sq. ft. (20 ft. x 32 ft.) for light soils. Gently rake into the top 1 to 3 inches of soil within 24 hours after applying. Do not use on soil containing more than 10 percent organic matter.

FROM SEED: Beans (Lima, Snap), Broccoli, Brussels sprouts, Cabbage, Carrots, Cauliflower, Celery, Collard, Greens (Mustard, Turnip), Kale, Okra, Peas (Green, Southern). Treat soil 10 weeks before planting seeds.

SEEDLINGS: Cantaloupe, Cucumber, Watermelon. Apply after plants are in 3 to 4 true leaf stage. Mix into soil. Do not allow treated soil to contact foliage.

ASPARAGUS (Established): Apply after ferns are removed, but before the spears appear. Mix into soil. Do not allow treated soil to contact foliage.

BEFORE TRANSPLANTING: Broccoli, Brussels sprouts, Cab-bage, Cauliflower, Celery, Peppers, Tomatoes. Apply to prepared soil and gently mix in before transplanting.

POTATO (except Maine): May be applied after planting, before plants sprout or after plants sprout. In all three cases, mix into the soil after applying. Do not damage seed pieces when mixing into soil, or allow treated soil to contact foliage.

FORMAT B – OPTIONAL MARKETING LANGUAGE AND SIMPLIFIED DIRECTIONS

Chemsico Green 'N Weed 15-15-15 is a dual action product that provides plants with the nutrients they need for vigorous growth while preventing the development of unsightly weeds. And Chemsico Green 'N Weed 15-15-15 granules are specially treated to last for 3 months. So feed your plants with Chemsico Green 'N Weed 15-15-15 and don't feed again or pull weeds all season! Chemsico Green 'N Weed 15-15-15 is ideal for use in established flower beds and

STOP

vegetable gardens, around shrubs and trees.

WHERE TO APPLY [USED]

Green 'N Weed 15-15-15 may be applied around:

Established **FLOWERS** African daisy, Ageratum, Aster (perennial), Balsam, Black-eyed Susan, California poppy, Carnation, Chrysanthemum, Cornflower, Cosmos, Daffodils, Dahlia, Dianthus, Dusty Miller, Forget-me-not, Gladiolus, Hollyhock, Impatiens, Marigold, Morning glory, Nasturtium, Periwinkle, Petunia, Phlox, Portulaca, Roses, Salvia, Shasta daisy, Snapdragon, Sunflower, Sweet alyssum, Sweet pea, Sweet William, Tulips, Vinca, Yarrow, Zinnia.

SHRUBS such as Arborvitae, Azalea, Barberry, Boxwood, Camellia, Lilac, Cotoneaster, Euonymus, Forsythia, Holly, Hon-eysuckle, Hawthorn, Juniper, Mock-orange, Mountain laurel, Pyracantha, Rhododendron, Spirea, Viburnum, Willow, Yew and more.

TREES such as Apple, Bald cypress, Balsam fir, Black gum, Black locust, Black walnut, Canada hemlock, Chinese chestnut, Cottonwood, Dogwood flowering, Douglas fir, European white birch, Honey locust, Japanese larch, Maple, Oak, Pine, Redbud, Spruce, Stonefruits, Sweetgum, Sycamore, Tuliptree, White ash.

GROUND COVER – Aaronsbeard, Asparagus fern, Bellflower (Adriatic), Big blue lilyturf, Bunge, California ivy, Ceanothus, Coreopsis, Cotoneaster, Crown vetch, Daisy trailing African, Dwarf coyote brush, Dwarf Peter Pan, Gazania, Germander, Largeleaf ice plant, Ivy (Algerian), Ivy (English), Rose of Sharon, Rosemary, Rupturewort, Snow-in-Summer, Speedwell, St. Johnswort, Stonecrop (Sedum), Strawberry (beach), Thrift-sea-pink, Tickseed, Verbena, Wire-vine (creeping), Yarrow (woolly), Zoysiagrass.

VEGETABLES – Asparagus (Established) Beans (Lima, Snap), Broccoli, Brussels sprouts, Cabbage, Cantaloupe, Carrots, Cauliflower, Celery, Collard, Cucumber, Greens (Mustard, Turnip), Kale, Okra, Peas (Green, Southern), Peppers, Potato, Tomatoes, Watermelon.

NOTE: Do not apply to Ajuga, Myrtle or Pachysandra as injury may result.

WEEDS GREEN 'N WEED PREVENTS:

Green 'N Weed 15-15-15 is effective in controlling weeds such as annual bluegrass, barnyardgrass (watergrass), bromegrass, cheat, crabgrass, carpetweed, chickweed, Florida purslane (pusley), foxtail, goosegrass, knotweed, kochia, lambsquarter, pigweed, purslane, Russian thistle, sandbur, ştinkgrass, Texas panicum, wildcane.

GUARANTEED ANALYSIS

	Total Nitrogen (N)	15%
	3.0% Ammoniacal Nitrogen	
	8.86% Urea Nitrogen*	
ĺ	3.14% Nitrate Nitrogen**	
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	Sulfur (S)	3.5%
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Primary plant food derived from: Ammonium Phosphate, Sulfur Coated Urea, Muriate of Potash and Polymer Coated Potassium Nitrate.

*8.86% slowly available urea nitrogen from sulfur coated urea. **3.14% controlled release nitrogen from polymer coated potassium nitrate. ***11.25% controlled release potash from polymer coated potassium nitrate.

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DIRECTIONS FOR USE It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For outdoor use around the home only.

ENTRY RESTRICTIONS Do not allow people or pets to enter the treated area until dusts have settled. If watering-in is required after the application, do not enter or allow others to enter the treated areas (except those involved in the watering) until the watering-in is complete and the surface is dry.

APPLICATION RESTRICTIONS

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USER SAFETY RECOMMENDATIONS

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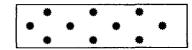
HOW IT WORKS

The nutrients in Chemsico Green 'N Weed 15-15-15 feed your plants while the weed [guard] [preventer] [control] stops weed seeds from [germinating] [growing] [starting] [sprouting]. The weed [guard] [control] [preventer] only affects seeds and won't harm your established plants or interfere with their growth. And unlike traditional plant foods that feed plants in one dose, Chem-sico Green 'N Weed 15-15-15 time-release granules have a special coating which releases a small amount of plant food and weed control each time the granules are contacted by water. (graphic of how time release granules release vs. other plant food.)

HOW TO APPLY

FOR ESTABLISHED FLOWERS, SHRUBS AND TREES

- 1. Remove any existing weeds in your flower [bed] [garden].
- 2. Break the seal and open the pop-top.
- 3 Sprinkle [Chemsico Green 'N Weed 15-15-15] [granules] evenly around established plants matching the picture shown. (A plant is considered established when it reaches 2 to 3 inches in height.)
- 4. Lightly water granules into soil.
- 5. Re-apply every 3 months as needed.



APPLICATION RATE 1 lb. treats 160 sq. ft.

FOR VEGETABLES

- 1. Remove any existing weeds from [planting bed] [garden].
- 2. Break the seal and open the pop-top.
- 3. Apply [Chemsico Green 'N Weed 15-15-15] [granules] to [planting bed] [garden] before or after setting transplants or after seedlings have reached the 3 to 4 true leaf stage. Sprinkle evenly over area to be treated. Apply at rate indi-cated below [for your type of soil]: For heavy or clay soil, [apply] [sprinkle] 1 lb. [of Chemsico Green 'N Weed 15-15-15] over 320 sq. ft. (16' x 32'). For light soils, [apply] [sprinkle] 1 lb. [of Chemsico Green 'N Weed 15-15-15] over 640 sq. ft. (20' x 32'). Do not use on soil containing more than 10 percent organic matter.
- 4. Gently mix granules into the top 1 to 3 inches of soil.

USE TIPS

- √ Use [Chemsico Green 'N Weed 15-15-15] in established flower and vegetable gardens. Applying to newly planted flower or vegetable seeds will prevent seeds from [germinat-ing] [growing] [starting] [sprouting]. [Chemsico Green 'N Weed 15-15-15] [this product] may be applied to soil before or after setting transplants.
- √ Apply [Chemsico Green 'N Weed 15-15-15] early in the grow-ing season to receive the maximum benefit of the 3 month feeding and weed control.
- √ Do not apply when plant foliage is wet and use care not to allow treated soil to contact foliage.
- √ Remember to water plants according to their regular watering schedule.
- √ When starting your garden from seeds, treat 10 weeks before planting.
- √ Gladiola corms less than 1 inch in diameter may be injured by pre-plant application.
- √ When using on ASPARAGUS, treat after ferns are removed, but before the spears appear.

[STORAGE AND DISPOSAL AND PRECAUTIONARY LANGUAGE FOR EITHER DIRECTION FORMAT]

STORAGE AND DISPOSAL

Storage: Store in a cool dry place away from heat or open flame. Disposal: If empty: Nonrefillable Container. Do not reuse or refill this container. 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Keep out of reach of children and pets. Causes eye irritation. Avoid contact with eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

First Aid

If in Eyes: 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. Call a poison control center for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

Environmental Hazards

This pesticide is extremely toxic to fish and other aquatic animals including shrimp and oyster. Do not apply directly to water. Do not allow to drift into canals, lakes, streams, ponds, marshes or estuaries. 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 or rain does not blow or wash pesticide off the treatment 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.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 800-332-5553

Made in the USA for Chemsico, Division of United Industries Corporation, P.O. Box 15842, St. Louis, MO 63114-0842

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