

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

HED ✓

DATE: July 19, 1979

SUBJECT: EPA File Symbol: 524-GGN SHACKLE
Caswell #661A

FROM: B.T. Backus
IRB/TSS

TO: Mr. Robert Taylor
Product Manager 25

Applicant: Monsanto Agricultural Products Company
Research Department
800 North Lindbergh Blvd.
St. Louis, MO 63166

Active Ingredient:

Isopropylamine salt of Glyphosate.....0.96%
Inert Ingredients:.....99.04%

Recommendations:

1. Under current Agency policy on conditional registration, the applicant is required to either submit acute toxicological studies conducted on the actual formulation as proposed for registration, or utilize the "Cite-all" method of support.

In this application, no Acute Dermal LD50, no Oral LD50, or Primary Dermal Irritation studies were submitted for this specific formulation. The submitted Eye Irritation study was conducted on a 1:20 dilution of EPA Reg. No. 524-308, rather than the 1:50 dilution proposed for registration.

The applicant should be given two choices; either to submit the required acute toxicological studies on the proposed formulation, or utilize the "Cite-all" method of support.

2. If the "Cite-all" method of support is utilized, IRB/TSS would have no objection, on the basis of incremental hazard to man and the environment, to the conditional registration of this product with the labeling revision indicated below.

Labeling:

The statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling" should appear immediately below the heading DIRECTIONS FOR USE.

Review

Acute Eye Irritation (rabbit); study conducted by Younger Laboratories, Inc. 123 Cliff Cave Road, St. Louis, MO 63129, utilizing a 1:20 dilution of ROUNDUP (EPA Reg. No. 524-308) in water (product as proposed for registration is a 1:50 dilution in water). Study dated March 19, 1976; submitted April 20, 1979; in EPA Acc. 238240.

Procedure: 0.1 ml was applied to one eye of each of 3 New Zealand white rabbits, with Draize scoring at 1, 24, 48, 72, 120 and 168 hrs.

Results: No corneal opacity. Conjunctival irritation at 1 and 24 hrs (slight erythema, moderate to copious discharge). All scores zero at 48 hrs and afterwards.

Study Classification: Core Minimum Data

Product Classification: For the 1:20 dilution of ROUNDUP, Tox. Cat. III: CAUTION

Byron T Backus 7-19-79

Byron T. Backus
IRB/TSS

Convenient Spray Applicator

STACKLE®

Weed and Grass Controller

**Destroys most unwanted plants
and their roots.**

Doesn't affect the soil.

EPA Reg. No. 524-

Active Ingredient:
Isopropylamine salt of Glyphosate 0.98%
Inert Ingredients: 99.04%
100.0%

CAUTION! Read precautions
on back panel.
Keep out of reach of children.

NET 1 qt (32 fl oz)

Read the entire label.

Use only according to label instructions.
Read "LIMIT OF WARRANTY AND LIABILITY" before
buying or using. If terms are not acceptable, return
at once unopened.

DIRECTIONS FOR USE

When used as directed, this product destroys most
weeds, grasses, sedges or harsh species, including
hard-to-control biennial weeds like dandelion and
thistle and grasses such as fescues, bermudagrass,
and crabgrass.

This product is absorbed by foliage and moves
throughout the plant resulting in destruction of both
the treated foliage and its supportive root system.
Visual effects are a gradual wilting and yellowing
which generally develop in five to ten days and
advance to a complete browning or deterioration of
foliage and underground plant parts.

This product does not harm adjacent desirable
plants that are not sprayed. It has no residual soil
activity so plants that are seeded or sown after
application will not be affected.

WHERE TO APPLY

Ornamentals: Apply this product to destroy
unwanted plants growing around ornamentals,
trees or shrubs. Spray contact, other than with
mature bark of desirable plants may cause injury.
Lawns and Edging: Apply this product to destroy
unwanted plants growing along the edges of lawns
or between cracks or crevices of sidewalks, driveways, curbs,
patios or similar areas.

Landscaping: Apply this product to destroy
unwanted weeds or grasses growing in areas where
plantings of ornamentals, trees, shrubs, desert land-
scapes, rock gardens, flower beds or similar plant-
ings will be made.

HOW TO APPLY

This product is supplied ready to use without further
mixing or dilution. It should be applied using the
applicator container as a foliage spray to weeds and
grasses. Do not add water or other materials to the
product.

Spray directly on the foliage of weeds or other
unwanted plants. The spray should be directed
and the nozzle tip adjusted so that only undesirable
plants receive spray. The sprayer tip should be held
approximately 12 inches from the foliage. Coverage
should be complete and uniform. Stepping feet
before the spray begins to drip or run all the foliage.
Avoid spray contact with desirable plants. If
desirable plants are accidentally sprayed, injury may
be reduced or prevented by thoroughly flushing with
water immediately.

Treated plants should not be mowed or disturbed by
fertilizer, digging or slicing for seven days after
application to allow time for the product to be ab-
sorbed and moved to the root system.

NOTE: Use of this product in any manner not com-
patible with the label may result in injury to persons,
animals, desirable plants or other unintended conse-
quences. Keep container closed to prevent spills
and contamination.

EPA Est. 524-1A 1 2005/53-3-9-79

In case of an emergency involving this product,
Call Collect, day or night, (314) 694-1000.

U.S. Pat. No. 3,799,754 covers use.

Other patents are pending.

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AGRICULTURAL PRODUCTS

ST. LOUIS, MISSOURI 63166 U.S.A.



PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals:
Keep out of reach of children.

CAUTION!

MAY CAUSE EYE IRRITATION.

Avoid contact with eyes.

FIRST AID - IN CASE OF EYE CONTACT: Flush with
plenty of water for at least 15 minutes. Call a
physician. Flush skin with water. Wash clothing
before reuse.

Environmental Hazards

Keep out of lakes, streams and ponds. Do not con-
taminated water by disposal of waste or cleaning of
equipment.

Storage and Disposal

Avoid contamination of soil, feed, and livestock.
Do not reuse container, destroy when empty.

LIMIT OF WARRANTY AND LIABILITY

This company warrants that this product is
reasonably fit for the purposes set forth in the Direc-
tions for Use, when used in accordance with these
Directions under the conditions described therein.
NO OTHER EXPRESS OR IMPLIED WARRANTY OF FIT-
NESS FOR PARTICULAR PURPOSE OR MERCHANT-
ABILITY IS MADE.

Buyer and all users shall promptly notify this com-
pany of any claims. Buyer and all users are responsi-
ble for all loss or damage from use or handling of
which results from conditions beyond the control of
this company, including, but not limited to, applica-
tion in any manner not explicitly set forth in the
Directions. THE LIMIT OF LIABILITY OF THIS COM-
PANY SHALL NOT EXCEED THE PURCHASE PRICE OF
THIS PRODUCT. IN NO EVENT SHALL THIS COM-
PANY BE LIABLE FOR ANY INCIDENTAL OR CONSE-
QUENTIAL DAMAGES.