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PM 23 239-2342

JAN 30 1996

Dennis P. Ward, Ph.D  
The SOLARIS Group of Monsanto Co.  
P.O. Box 5006  
San Ramon, CA 94583-0906

Dear Dr. Ward:

SUBJECT: Label Amendment - Product Name Change, Conversion to Professional Use, Updated Precautionary Language  
Weed-B-Gon M  
EPA Registration No. 239-2342  
Your Application Dated December 21, 1995

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

1. Revise the footnotes to the Ingredient Statement to include 2,4-D and MCPP equivalents expressed in pounds/gallon (0.79 lbs./gal. for 2,4-D and 0.84 lbs./gal. for MCPP).
2. Place the following Worker Protection Standard (WPS) exclusionary statement (1) on the front panel of the label in association with the product name or (2) near the beginning of the Directions For Use section:  
  
"Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes."
3. Add the phrase "and may contaminate groundwater" at the end of the second sentence of the Pesticide Disposal instructions.

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #2:S498929.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jan 29, 1996							

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4. Revise the paragraph under Hazards To Humans & Domestic Animals to read as follows:

"DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Avoid contact with skin. When mixing, loading or applying this product, wear face shield or goggles, long-sleeved shirt, long pants, socks, shoes, and chemical-resistant gloves. After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried."

5. Revise the groundwater contamination statements (the 4th, 5th and 6th sentences under Environmental Hazards) to conform exactly to Agency guidance for products containing 2,4-D and MCP. The corrected statements should read as follows:

"Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling this pesticide at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination."

6. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

Your decision to revise the labeling for professional use only and to pursue the sale of this registration rather than its voluntarily cancellation (as agreed to by EPA in my letter dated 1/23/85) is acceptable. The proposed labeling, with the changes required above in items 1 through 5, is adequate to mitigate the Agency's concerns regarding eye irritation risks to homeowners.

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Finally, we acknowledge the change in the name of record for the subject product from "WEED-B-GON M" to "Weed Killer M". Please use the new name in all future correspondence with the Agency concerning this product.

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

)  
Enclosure

JAN 30 1996

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
239-2342

ORTHO®

~~WEED-B-GON® M Weed Killer M~~

[ABN: ~~WEED-B-GON Lawn Weed Killer~~]

Treats 38,400 Sq. Ft. [Gal. size]

[water droplet] water based

Controls Dandelions, Clover, Chickweed, Wild Onion, Oxalis, Ground Ivy, and many other listed weeds.

**For Sale to and Use by Professional Personnel Only. Not for Sale to Homeowners**

WILL NOT HARM LAWN GRASSES

When Used According to Directions.

Contains Wetting Agent for Added Value

CONCENTRATE

Mix with water and spray

Active Ingredients

2,4-Dichlorophenoxyacetic acid, di-  
methylamine salt\* ..... 10.8%

2-(2-Methyl-4-chlorophenoxy) propionic acid, di-  
methylamine salt\*\* ..... 11.6%

Inert Ingredients ..... 77.6%

\*2,4-Dichlorophenoxyacetic acid equivalent,  
isomer specific by AOAC Method 6.D01-5: 9.0%

\*\*2-(2-Methyl-4-chlorophenoxy) propionic acid  
equivalent: 9.6%

KEEP OUT OF REACH OF CHILDREN

DANGER

See Back Panel Booklet For Additional Precautionary Statements.

NET CONTENTS 16 fl oz (1 pt) 473 mL

NET CONTENTS 32 fl oz (1 qt) 946 mL

NET CONTENTS 64 fl oz (1/2 gal) 1.89 L

NET CONTENTS 1 gal (3.78L)

~~WEED-B-GON Lawn Weed Killer M~~ controls lawn weeds and will not harm lawn grasses when used according to directions. Do not apply to Dichondra, Lippia, St. Augustine and Clover lawns.

Controls: Black Medic, Buckhorn Plantain, Canada Thistle, Carpetweed, Common Burdock, Common Chickweed, Common Plantain, Clover, Creeping Beggarweed, Curly Dock, Dandelion, Dichondra, Fennel, Fleabane, Florida Pusley, Ground Ivy, Hawkweed, Henbit, Knotweed, Lambsquarters, Lawn Pennywort, Lippia, Mallow, Morning Glory, Mouseear Chickweed, Oxalis, Pigweed, Purslane, Ragweed, Shepherdspurse, Sheep Sorrel, Smartweed, Sow Thistle, Speedwell, Spurge, Thistles, Wild Carrot, Wild Garlic, Wild Geranium, Wild Onion and Yarrow.

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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.

**READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.**

tsp = teaspoon  
Tbs = Tablespoon

**WEED-B-GON** ~~Weed Killer M~~ controls lawn weeds and will not harm lawn grasses when used according to directions. Do not apply to Dichondra, Lippia, St. Augustine, and Clover lawns.

**FOR USE ON LAWNS:** Apply any time weeds are actively growing. Do not apply when temperatures are expected to exceed 85°F within 24 hours. Weeds such as Wild Onion should be sprayed in late fall and again in early spring. The maximum number of broadcast applications (entire lawn) is 2 per year.

**HOW TO USE:** May be applied with an ~~ORTHO~~ Hose-End Sprayer or tank-type sprayer. Refer to table for recommended dilution. If lawn needs watering, water thoroughly before application. Do not water for 48 hours after application. Spray lawn, wetting weeds, and lawn grasses; do not overspray. Spray when air is calm to avoid spray drift that might injure desirable flowers, shrubs, and other plants. Coarse sprays are less likely to drift. Make new dilution for each use.

**NEWLY SEEDED LAWNS** may be treated after they have been mowed at least 3 times.

**HARDY WEEDS:** For hardy weeds, repeat application in 2 to 3 weeks if necessary. The maximum number of broadcast applications (entire area) is 2 per year.

**IMPORTANT:** Do not use this product in flower or vegetable beds or around shrubs or ornamental plantings. Do not reseed for 3 to 4 weeks after use.

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	Amount of Weed Killer to Use***	Water To Use	Area to Treat
Tank Sprayer Graphic	4 tsp*** (1-1/3 Tbs)	1 gal	200 sq ft
Hose-End Sprayer Graphic	8 Tbs*** (4 oz)	6 gal	1200 sq ft

\*\*\*Use one-half of this rate for Bent, Bermuda, Red Fescue, Centipede, and Carpet grasses.

BENT, BERMUDA, RED FESCUE, CENTIPEDE, AND CARPET GRASSES: GROWING SEASON-Use 2 tsp per gal of water. Make 2 applications 10 days apart. Temporary injury may occur. DORMANT SEASON (WINTER): BERMUDA, CENTIPEDE, CARPET GRASSES: Use 4 tsp per gal of water and apply when turf is dormant (brown). Reduce rate to 2 tsp per gal water when turf has greened up and is growing.

~~TO PREPARE REFILL FOR WEED B GON WEED KILLER, EPA REG. NO 239 2499:- Measure 1 Tbs of WEED B GON M into the empty container of WEED B GON Weed Killer (24 oz size) and then fill with tap water. Use according to the directions and precautions on the applicator bottle.~~

**STORAGE AND DISPOSAL**

**Do not contaminate water, food, or feed by storage or disposal.**

**PESTICIDE STORAGE:** Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Avoid contamination of feed and foodstuffs. Do not store near feed, foodstuffs, fertilizers, seeds, insecticides or fungicides. Store in a cool, dry place, preferably in a locked storage area. Do not store diluted spray.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

~~PRODUCT Partially filled container may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash.~~

~~CONTAINER Do not reuse empty container. Rinse thoroughly before discarding in trash.~~

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**DANGER:** Corrosive to eyes. Causes eye damage. Do not get in eyes. Harmful if swallowed. Avoid contact with skin or clothing. **MIXING/APPLYING:** When mixing or applying this product, wear goggles or face shield, long pants, long sleeved shirt, socks, shoes, and chemical resistant gloves. Wash nondisposable gloves thoroughly with soap and water before removing. Remove contaminated clothing and launder separately before reuse. Promptly and thoroughly wash hands and exposed skin with soap and water after using this product. Do not allow others such as children and pets on treatment area during application or to reenter treated areas until spray has dried.

~~**FIRST AID:** In case of eye contact, immediately flush eyes with fresh water for 15 minutes and get medical attention. If swallowed, give plenty of water or milk to drink and telephone for medical advice. DO NOT make person vomit unless directed to do so by medical personnel. If medical advice cannot be obtained, then take person and product container to the nearest medical emergency treatment center or hospital. In case of skin contact, wash skin with plenty of soap and water. Get medical attention if irritation persists. Note to Physicians: Emergency Information call 1-800-454-2333.~~

**IF IN EYES:** Hold eyelids open and flush with a steady stream of water for 15 minutes. Call a physician. **IF SWALLOWED:** Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Get medical attention. Do not induce vomiting. Do not give anything

by mouth to an unconscious person. Note to the Buyer: Probable maximal damage may contraindicate the use of this product. For more information call 1-800-454-2333

**ENVIRONMENTAL HAZARDS:** This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, ~~in or near~~ ~~streams, rivers, lakes, ponds, or other~~ ~~areas below the mean high water mark.~~ Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing and disposal sites. Exercise caution when handling pesticides to prevent contamination of groundwater supplies. Mixing and cleaning of equipment on an impervious pad such as concrete will help contain spills and prevent groundwater contamination. Do not contaminate water when disposing of equipment washwaters. When cleaning equipment, do not pour the washwater on the ground. Spray or drain over a large area away from wells and other water sources. **NOTICE:** Buyer assumes all responsibility for safety and use not in accordance with directions.

- Medical Information call 1-800-454-2333
- Product Information call 1-800-225-2883

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The SOLARIS Group of  
 Monsanto Company  
 P.O. Box 5008  
 San Ramon CA 94583-0808  
 Form RS5768-A Product 5088  
 EPA Reg. No. 239-2342  
 EPA Est. ~~239-1A-3<sup>+</sup>, 58996-MO-1<sup>^</sup>~~  
 Superscript is first letter of lot number  
 Made in USA  
 UPG