

PM 25 239-2491 7/14/97

Page 1 of 13

JUL 14 1997

Mr. Stephen R. Cornes
The Solaris Group of Monsanto Company
P.O. Box 5006
San Ramon, CA 94583

Dear Mr. Cornes:

Subject: Brush-B-Gon Brush Killer (Add Weeds and Update
Precautionary Statements)
EPA Registration No. 239-2491
Your Application Dated June 5, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable provided you address the following comment.

--Since you are adding the site zoysiagrass to your turf subset label (page 9), you must delete "Zoysia" from the statement on page 6 under "Lawn Weed Control".--

Please submit three (3) copies of your final printed labeling incorporating the above change before you release the product for shipment. A stamped copy of labeling is enclosed for your records.

Sincerely,

James A Tompkins
Product Manager 25 UICW
Herbicide Branch
Registration Division (7505C)

[ICON] OUTDOOR USE ONLY
[6/13/95 Notification] ICON – Water Based

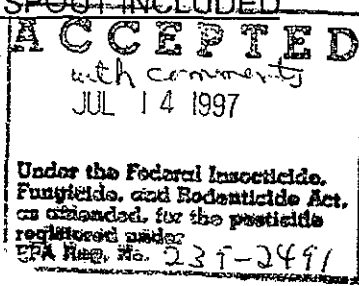
ORTHO® BRUSH-B-GON® Brush Killer
[ABN: ORTHO® Brush-B-Gon® Poison Ivy, Poison Oak & Brush Killer,]
[6/3/97 Notification] ABN: ORTHO® Weed-B-Gon® Oxalis, Clover & Chickweed Killer

Makes 16 Gal Spray [1/2 GAL size]
Makes 8 Gal Spray[Quart size]
Makes 4 GAL Spray[Pint size]
[6/4/97 Notification] Great Value – Concentrate makes 4/8 gallons spray
Value Priced – Concentrate makes 4/8 gallons spray

[4/15/96] CONCENTRATE
KILLS WOODY PLANTS, INCLUDING STUMPS AND VINES
ALSO CONTROLS LAWN WEEDS
POISON OAK, POISON IVY, WILLOWS, OAK, KUDZU, BLACKBERRIES, & OTHER LISTED WOODY PLANTS

[6/4/97 Notification] Also Kills Blackberries, Kudzu & Stumps
Kills Poison Ivy & Poison Oak; Kills Blackberries; Kills Kudzu; Controls Poison Ivy and Poison Oak; Controls Blackberries; Controls Kudzu; Works hard so you don't have too;
Kills 38 of the toughest weeds; Kills hard-to-control weeds; Tough weeds are no problem with Brush-B-Gon; Your solution to tough weed problems; The solution to tough weed problems; The tough weed solution

FOR HOME USE ONLY
[6/4/97 Notification - Measuring Cap Packaging]
NEW / NOW WITH MEASURING CAP AND POUR SPOUT INCLUDED
NOW EASIER TO MEASURE AND POUR
CHILD RESISTANT CAP
FAST & EASY MEASURING CAP
EASY POUR SPOUT
IMPROVED PACKAGE



Convenient Applicator Top

Active Ingredient By Wt.
*Triclopyr[6/5/97 Amendment](~~3,5,6-trichloro-2-pyridinyl-oxyacetic acid~~)
as the triethylamine salt.....8%
Inert Ingredients92%
*Equivalent to 5.7% acid

KEEP OUT OF REACH OF CHILDREN
CAUTION

See side-back panel booklet for additional precautionary statements.

3 7 13

NET CONTENTS 64 FL OZ (1/2 GAL) 1.89 L
NET CONTENTS 32 FL OZ (1 QT) 946 mL
NET CONTENTS 16 FL OZ (1 PT) 473 mL

[THE FOLLOWING COPY IS FOR FIX-A-FORM BOOKLET TYPE LABELS WHICH CONSUMERS CAN OPEN, READ, AND RESEAL EASILY AT RETAIL AS WELL AS AT TIME OF USE]

BRUSH-B-GON® kills woody plants including stumps and vines around homes, cabins, buildings, fence lines, trails, and home rights-of-way. Controls: Poison Oak, Poison Ivy, Blackberries, Kudzu, Willows, Oak, and other listed woody plants.

Do not use around edible feed or food crops.

[6/4/97 Notification] SQUEEZE TURN TURN [illustration]

To open: squeeze cap while unscrewing

Peel open for use directions and further information.

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. SEE ADDITIONAL PRECUATIONARY STATEMENTS AND DIRECTIONS INSIDE BOOKLET.

PULL HERE TO OPEN LABEL PRESS TO RESEAL

[6/4/97 Notification- Duplicate of back label text] Medical Information call 1-800-454-2333

Product Information call 1-800-225-2883

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Manufactured for

The SOLARIS Group of

Monsanto Company

P.O. Box 5008

San Ramon CA 94583 0808

Product 5467

Form RS681-A

EPA Reg. No. 239-2491

EPA Est. 239-1A 3¹, 58996 MO-4^A

Superscript is first letter of lot number

Made in USA

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.

~~BRUSH-B-GON® Brush Killer is formulated to control unwanted woody vegetation in areas around homes, cabins, buildings, fence lines, trails, home right of way and other non-garden areas.~~

CONTROLS

Arkansas Rose	Himalayan Blackberry	Red Alder
Big Leaf Maple	Honeysuckle	Sassafras
Black Cottonwood	Kudzu	Scouler Willow
Black Willow	Mackenzie Willow	Sweet Gum
Box Elder	Mesquite	Tansy Ragwort
California Rose	Mimosa	Trailing Blackberry
Choke Cherry	Maple	Trumpet Creeper
Common Ragweed	Narrow Leafed Willow	Virginia Creeper
Elderberry	Oak	Wild Blackberry
Elm	Persimmon	Wild Grape
Evergreen Blackberry	Poison Ivy	Wild Rose
Field Horsetail Rush	Poison Oak	Willow
Giant Ragweed	Raspberry	

~~WHEN TO APPLY: Apply as a full coverage foliar spray when vegetation is fully leafed out and actively growing. Apply also to trunks and limbs of trees and stems of vines. Wilting or other symptoms will occur in 2 to 6 weeks. [Information moved to section below to improve information flow] Application to mature foliage is preferred. [Label copy moved to how-to-apply section to improve information flow] Apply only when the air is calm to prevent drift to desirable vegetation. Rainfall within 24 hours may reduce effectiveness of treatment. Do not use on or around edible feed or food crops. [6/5/97 Amendment] Keep pets and grazing animals out of treated area for 24 hours following application. [reentry icon] People and pets may enter treated area after spray has dried.~~

~~HOW TO APPLY FOLIAGE SPRAY: To apply with ORTHO hose end sprayers (ORTHO SPRAY-ETTE® 4, ORTHO Super Six SPRAY-ETTE® or ORTHO DIAL 'n SPRAY®), tank sprayer or power sprayer, flip up spout and getty squeeze product into sprayer jar. Mix 4 fl oz per gal water and apply to thoroughly wet all leaves, stems, and trunks. Application to mature foliage is preferred. [Information relocated from when to apply section to improve information flow] Use low pressure and coarse spray pattern to reduce spray-drift which may possibly damage desirable vegetation. Wilting or other symptoms will occur in 2 to 6 weeks. [Information moved from "When to Apply" section to improve information flow] Certain hard-to-control species, such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle may require retreatment the following season for complete control.~~

[6/4/97 Notification] [Measuring cap packaging]

MEASURING CAP: The cap has 4 measuring lines indicated inside. Fill cap to appropriate line for fast, easy, accurate measuring. Close cap tightly after use - no need to rinse.

Line 1 = 1 teaspoon (tsp)

Line 2 = 1 Tablespoon (Tbs) = 3 tsp

Line 3 = 1 fl oz (2 Tbs)

Line 4 = 2 fl oz (4 Tbs)

<u>APPLICATOR</u>	<u>MIXING INSTRUCTIONS</u>	<u>AREA TO TREAT</u>
<u>Tank Sprayer</u>	<u>Fill to Line 4 two times (4 oz). Add to 1 gal of water.</u>	<u>Spray leaves, stems and trunks until they begin to drip.</u>
<u>ORTHO DIAL 'n SPRAY Hose-End Sprayer</u>	<u>Pour product into sprayer jar. Do not add water. Set dial to 4 oz and spray. Pour leftover concentrate back into package when spraying is complete.</u>	<u>Spray leaves, stems and trunks until they begin to drip.</u>

THREE DIFFERENT WAYS TO CONTROL BRUSH:

Foliar Spray: Treats large areas of unwanted brush.

Vine Killing: Spot treats vines growing around desirable trees & shrubs.

Stump Killing: Treats freshly cut stumps to prevent regrowth.

STUMP & VINE KILLING: To kill stumps and prevent regrowth from stumps of trees such as Alder, Box Elder, Black Cherry, Choke Cherry, Elm, Manzanita, Maple, Oak, Persimmon, Peach, and Willow, apply product undiluted with a paint brush to the entire freshly cut stump, including the cut surface, remaining trunk and any-exposed roots.

~~surfaces.~~ VINE KILLING: When brushy-vines such as Poison Oak, Poison Ivy, etc., grow on or around desirable plants, do not allow spray to contact desirable vegetation. cut the vine first and treat as directed for stump killing.

Do not reuse paint brush. Wrap brush in newspaper and put in trash collection.

(or)

Apply product undiluted by flipping up the spout on the cap and gently squeezing bottle to cover the entire freshly cut stump. Close spout when finished.

Note: To kill small ~~undesirable~~ woody plants (as listed), cut plant off at ground level and treat freshly cut stump. This prevents regrowth without the unsightliness of the dying plant being present in landscaping. **Keep off desirable plants.**

~~VINE KILLING: When brushy vines such as Poison Oak, Poison Ivy, etc. grow on or around desirable plants, do not allow product to contact desirable vegetation. Cut the vine first and treat as directed for stump killing. [Information moved to Stump and Vine Killing paragraph to reduce redundancy and improve information flow.]~~

LAWN WEED CONTROL: (Cool Season Grasses-Bluegrass, Fescue, Ryegrass, Bentgrass)-For control of Dandelion, Oxalis, White Clover, Pennywort, Black Medic, Plantains, Wild Geranium, Florida Pusley, Evening Primrose, Red Sorrel and Ironweed, apply 4 tsp per gal of water to treat 200 sq ft (or 4 fl oz per 6 gal of water to treat 1,200 sq ft). May be applied with an ORTHO SPRAY-ETTE

Hose-End Sprayer or tank-type sprayer anytime weeds are actively growing. If lawn needs watering, water thoroughly before application. Make new dilution for each use.

Hardy Weeds-For hard to control weeds or to control any missed in first application, make a second application in 2 to 3 weeks if necessary.

Important: Do not use this product for controlling weeds in flower or vegetable beds or around shrubs or ornamental plantings. Do not use on St. Augustine, Centipede, Zoysia or Bermudagrass lawns.

IMPORTANT

BRUSH-B-GON Brush Killer is non-selective. Do not apply to or clean equipment around desirable vegetation or ornamental plant as injury may result. Do not apply when drift may occur.

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. Do not store diluted spray.

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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. ~~STATEMENT OF PRACTICAL~~

~~TREATMENT: FIRST AID: [6/5/97 Amendment] If swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin: Wash with plenty of soap and water. Get medical attention. If in eyes: Flush with plenty of water. Call a physician if irritation persists. If~~
In Eyes: Flush with plenty of water. Call a physician if irritation persists.

Note to Physicians: Emergency Information call 1-800-457-2022-454-2333.

ENVIRONMENTAL HAZARDS: [6/5/97 amendment] ~~Do not apply directly to water.~~
[Updated per PR Notice 93-8] ~~to areas where surface water is present or to intertidal~~
~~areas below the mean high water mark. Do not contaminate water by cleaning of~~
~~equipment or disposal of wastes. Do not apply directly to any body of water. Do not~~
~~pour product or rinse water down any drain.~~

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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Manufactured for
The SOLARIS Group of
Monsanto Company
P.O. Box 5008
San Ramon, CA 94583-0808
Product 5467
Form RS681-A
EPA Reg. No. 239-2491
EPA Est. 239-IA-3¹, 58996-MO-1^A
Superscript is first letter of lot number
Made in USA

[6/5/97 Amendment – Label Subset For Turf]

2. Turf Subset For : ABN ORTHO® Weed-B-Gon® Oxalis, Clover & Chickweed Killer
[ICON] OUTDOOR USE ONLY [optional]

CONCENTRATE

Covers / Treats 5000 sq ft (pt), 10,000 sq ft (qt)

Water Based

NEW

Unique Formula - Kills Tough Weeds

Helps Ensure a Weed Free Lawn

Tough Weed Formula

Kills Tough Weeds in Lawns

Kills / Controls Ground Ivy (Creeping Charlie) & Wild Violet

Won't Harm Lawn Grasses

The easy way to stop/kill weeds - roots & all [illustration]

Kills to the Root [illustration]

Kills Weeds Systemically [illustration]

Systemic [illustration]

Kills weeds - roots & all [illustration]

Measuring Cap Package:

NEW/NOW WITH MEASURING CAP & POUR SPOUT

NOW EASIER TO MEASURE & POUR

CHILD RESISTANT CAP

FAST & EASY MEASURING CAP

EASY POUR SPOUT

IMPROVED PACKAGE

Active Ingredient

***Triclopyr as the triethylamine salt.....8%**

Inert Ingredients92%

***Equivalent to 5.7% acid**

KEEP OUT OF REACH OF CHILDREN**CAUTION**

See back panel booklet for additional precautionary statements.

NET CONTENTS 16 FL OZ (1 PT) 473 mL

32 FL OZ (1 QT) 946 mL

PEEL
HERE

Open Resealable Label
For Directions & Precautions

PRESS TO RESEAL

**WON'T HARM COOL SEASON LAWN
GRASSES***

Bent, Buffalo, Fescues, Kentucky Blue, Rye
or Zoysia

KILLS TOUGH WEEDS

Chickweed, Clover, Ground Ivy (Creeping
Charlie), Oxalis, Poison Ivy, Speedwell
(Veronica), Wild Violet

See inside label for many more weeds

* Not for use on Bermuda lawns.

Also combine with Weed-B-Gon® Lawn Weed Killer, to quickly kill all major
broadleaf weeds in lawns. Specially formulated for added control of tough weeds
such as / like clover, oxalis & speedwell!

Specially formulated for residential use

Measuring Cap Package:

SQUEEZE TURN TURN illustration

To open, squeeze cap while unscrewing

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner
inconsistent with its labeling.

1 Tablespoon (Tbs) = 3 teaspoons (tsp)

1 Fluid Ounce (fl oz) = 2 Tablespoons (Tbs)

1 Cup = 8 Fluid Ounces (fl oz)

Weeds Controlled:

Chickweed (Common, Mouseear), Clover, Ground Ivy (Creeping Charlie), Oxalis,
Poison Ivy, Speedwell (Veronica), Wild Violet

plus Black Medic, Carolina Geranium, Cinquefoil, Dandelion, Evening Primrose, Florida
Pusley, Ironweed, Lespedeza, Morning Glory (Bindweed), Pennywort, Plantains, Red
Sorrel, Spurge (Garden, Spotted), Thistle, Wild Onion, Yellow Rocket

Mixing Instructions

Amount to Use: 4 tsp per gallon of water for each 200 sq ft

- When using Ortho Dial'n Spray: Set dial to 4 tsp. Add 4 fl oz to sprayer jar. DO NOT add water. Spray evenly over 1200 sq ft until jar is empty.

How to Apply

- To treat entire lawn: Use a tank or hose-end sprayer. Measure lawn. Calculate square feet by multiplying length times width. Spray evenly over measured area.
- To spot treat individual weeds in lawn: Use a tank sprayer.
- If an ornamental shrub or tree is in the lawn, keep spray off foliage and exposed roots.
- Not for use on Bahia, Bermuda, Centipede, Kikuyu or St. Augustine lawns. Not for use on or around fruits, vegetables or flowers.

When to Mow & Water

- For best results avoid mowing 1 to 2 days before or after application.
- If lawn needs watering, water thoroughly before application.
- Rain or watering within 24 hours may reduce effectiveness.

When to Apply

- Apply any time / when weeds are actively growing.
- Spray when temperature is below 90° F.
- Spray when air is calm to prevent drift to desirable plants.
- Reapplication can be made in 2 to 3 weeks if necessary.
- Newly seeded lawn can be sprayed after second mowing.

Combine with Weed-B-Gon® Lawn Weed Killer₂ to quickly kill all major broadleaf weeds in lawns. See the label of Weed-B-Gon® Lawn Weed Killer₂ for more than 80 broadleaf weeds. Follow all directions and precautions on both product labels.

Mixing Instructions for Combination Spray

Amount to Use: 1 fl oz (2 Tbs) of this product + 2 fl oz (4 Tbs) Weed-B-Gon Lawn Weed Killer₂ per gallon of water for each 400 sq ft.

- **When using Ortho Dial'n Spray:** Set dial to 3 oz. Add 3 fl oz of this product + 6 fl oz of Weed-B-Gon Lawn Weed Killer₂ to sprayer jar. **DO NOT** add water. Spray evenly over 1200 sq ft until jar is empty.

OR

Mixing Instructions for Combination Spray

Amount to Use: ½ fl oz (1 Tbs) of this product + 1 fl oz (2 Tbs) Weed-B-Gon Lawn Weed Killer₂ per gallon of water for each 200 sq ft.

- **When using Ortho Dial'n Spray:** Set dial to 1½ oz. Add 3 fl oz of this product + 6 fl oz of Weed-B-Gon Lawn Weed Killer₂ to sprayer jar. **DO NOT** add water. Spray evenly over 1200 sq ft until jar is empty.

Measuring Cap Package:

MEASURING CAP: The cap has 4 measuring lines indicated inside. Fill cap to appropriate line for fast, easy, accurate measuring. Close cap tightly after use- no need to rinse.

Line 1 = 1 teaspoon (tsp)

Line 2 = 1 Tablespoon (Tbs) = 3 tsp

Line 3 = 1 fl oz (2 Tbs)

Line 4 = 2 fl oz (4 Tbs)

<u>APPLICATOR</u>	<u>PRODUCT TO USE</u>	<u>AREA TO TREAT</u> <u>SQ FT</u>
<u>Tank Sprayer</u>	Fill to Line 1 four times (4 tsp). Add to 1 gal of water.	<u>200 (20 X 10)</u>
<u>Ortho Dial'n Spray Hose-End Sprayer</u>	Fill to Line 4 two times (4 fl oz). DO NOT add water. Set dial to 4 tsp and spray.	<u>1200 (20 X 60)</u>

STORAGE AND DISPOSAL

STORAGE: Store in original container in a safe place.

DISPOSAL: Do not reuse container. Securely wrap partially filled or empty container in newspaper and put in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling.

[reentry icon] People and pets may enter treated area after spray has dried.

FIRST AID: If In Eyes: Flush with plenty of water. Call a physician if irritation persists.

Note to Physician: Emergency Information call 1-800-454-2333

ENVIRONMENTAL HAZARDS: Do not apply directly to any body of water. Do not pour product or rinse water down any drain.

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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Manufactured for

The SOLARIS Group of

Monsanto Company

P.O. Box 5008

San Ramon CA 94583-0808

Form

EPA Reg. No. 239-2491

EPA Est. 239-IA-3¹, 58996-MO-1^A

Superscript is first letter of lot number

Made in USA