

PM 25

239-2491

4/13/98

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APR 13 1998

Stephen R. Cornes
The Solaris Group of Monsanto
P.O. Box 5006
San Ramon, CA 94593-0906

Dear Mr. Cornes

Subject: Revised Label
Ortho Brush-B-Gon Brush Killer
EPA Registration No. 239-2491
Your Submission Dated March 23, 1998

The amendment 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. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. It is understood that the editorial text within the brackets will not appear on the final printed labeling.

b. On page 4 under How to Apply, the statement "Not recommend for weed control in lawns" is confusing since directions for lawn weed control appear on the next page. We suggest a statement similar to the following:

Foliage spray is not recommended for weed control in lawns.

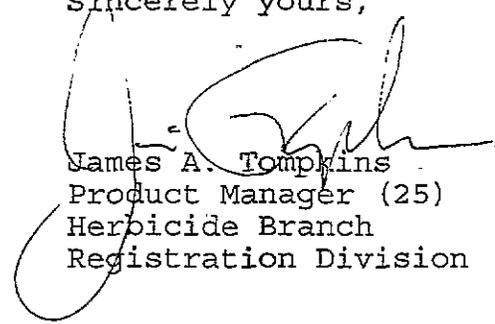
c. On page 9 under Mixing Instructions assure that the last "4" which wasn't crossed out is deleted when the labels are printed

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

2713

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

Sincerely yours,



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

Enclosure

[ICON] OUTDOOR USE ONLY
[ICON] Water Based

ORTHO® BRUSH-B-GON® Brush Killer
ABN: ORTHO® Brush-B-Gon® Poison Ivy, Poison Oak & Brush Killer,
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]
Great Value $\frac{1}{2}$ Concentrate makes 4/8 gallons spray
Value Priced – Concentrate makes 4/8 gallons spray

CONCENTRATE

KILLS WOODY PLANTS, INCLUDING STUMPS AND VINES
ALSO CONTROLS LAWN WEEDS POISON OAK, POISON IVY, WILLOWS, OAK,
KUDZU, BLACKBERRIES, & OTHER LISTED WOODY PLANTS

Also Kills Blackberries, Kudzu & Stumps

Also kills Blackberries, Kudzu, Stumps & Other Woody Plants.

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

NEW / NOW WITH MEASURING CAP AND POUR SPOUT INCLUDED

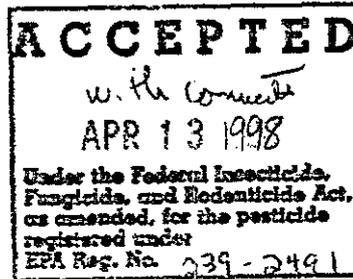
NOW EASIER TO MEASURE AND POUR

CHILD RESISTANT CAP

FAST & EASY MEASURING CAP

EASY POUR SPOUT

IMPROVED PACKAGE



Convenient Applicator Top

Active Ingredient

Triclopyl [3/20/98 Amendment], triethylamine salt.....	8%
Other Ingredients	92%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional precautionary statements.

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.

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 PRECAUTIONARY STATEMENTS AND DIRECTIONS INSIDE BOOKLET.

PULL HERE TO OPEN LABEL PRESS TO RESEAL

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.

Open Resealable Label
For Directions & Precautions

Product Facts	
KILLS WEEDS	Including: Blackberries, Black Cottonwood, Box Elder, Choke Cherry, Elderberry, Elm, Honeysuckle, Horsetail Rush, Kudzu, Maples, Mesquite, Mimosa, Oak, Persimmon, Poison Ivy, Poison Oak, Ragweeds, Raspberry, Red Alder, Sassafras, Sweet Gum, Tansy Ragwort, Trumpet Creeper, Virginia Creeper, Wild Grape, Wild Rose & Willows
WHERE TO USE	• Around homes, cabins & other buildings • Along fences & trails
AMOUNT TO USE	4 fl oz (8 Tbs) per gal of water

Product Information Call 1-800-225-2883 or <http://www.ortho.com>
Medical Information Call 1-800-454-2333
 (Or Optional Text For One Phone Number) Questions, Comments or Medical Information?
 Call: 1-800-225-2883 - <http://www.ortho.com>

CONTROLS [3/20/98 Amendment] To add additional weed controlled

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
<u>Brazilian Pepper</u>		
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 when vegetation is actively growing. Apply only when the air is calm to prevent drift Rainfall within 24 hours may reduce effectiveness. Do not use on or around edible feed or food crops. [reentry icon] People and pets may enter treated area after spray has dried.

Alternate reformatted text for increased understanding by consumer

WHEN TO APPLY

- Apply when weed is leafed out and actively growing.
- Apply when air is calm to prevent drift to desirable plants.
- Rain within 24 hours after application may reduce effectiveness.
- Wilting or yellowing will occur in 2 to 6 weeks. Hard to kill weeds may require a repeat application if regrowth occurs.

Note: Contact with Poison Oak or Poison Ivy anytime of the year can cause an allergic reaction. Handle dead plants with rubber gloves. Dispose of plants & rubber gloves in tightly sealed garbage bags.

IMPORTANT: Do not use on or around edible feed or food crops.

HOW TO APPLY FOLIAGE SPRAY: Mix 4 fl oz per gal water and apply to thoroughly wet all leaves, stems, and trunks. Application to mature foliage is preferred. Use low pressure and coarse spray pattern to reduce drift which may damage desirable vegetation. Wilting or other symptoms will occur in 2 to 6 weeks. Certain

hard-to-control species, such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle may require retreatment

Alternate reformatted text for increased understanding by consumer

MIXING INSTRUCTIONS
Tank Sprayer Add 4 fl oz (8 Tbs) to 1 gal of water.
Ortho® Dial'n Spray® <ul style="list-style-type: none"> • Set dial to 4 oz. • For each gal of spray add 4 fl oz to sprayer jar. • DO NOT add water. • After spraying, unused product can be poured back into its original container.

1 Tablespoon (Tbs) = 3 teaspoons (tsp) 1 fl oz = 2 Tbs

HOW TO APPLY

- Use coarse spray pattern to reduce drift to desirable plants.
- Spray weed to thoroughly wet foliage, stems and trunk. *Foliage Spray is*
- Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns.
- If weed is growing around desirable plants, shield plants from drift with a sheet of cardboard or plastic; or cut weed at base & treat as directed for stumps.
- If desirable plant is accidentally sprayed, rinse off immediately with water.

For Stumps

- Apply product undiluted with a paint brush to the entire freshly cut stump, including the cut surface, remaining trunk & exposed roots.
- Do not reuse paint brush. Wrap brush in newspaper & put in trash.

For Vines

- If weed is growing up poles, fences or mature tree trunks, spray to thoroughly cover weed up to a height of 3 to 4 feet.
- If weed is climbing a shrub, to avoid damage to shrub, cut weed at base & treat as directed for stumps.

[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)



APPLICATOR	MIXING INSTRUCTIONS	AREA TO TREAT
Tank Sprayer	Fill to Line 4 two times (4 oz). Add to 1 gal of water.	Spray leaves, stems and trunks until they begin to drip.
ORTHO DIAL 'n SPRAY Hose-End Sprayer	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.	Spray leaves, stems and trunks until they begin to drip.

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 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 exposed roots. **VINE KILLING:** When vines such as Poison Oak, Poison Ivy, etc., grow around desirable plants, 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.**

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, 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: 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 skin, 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 Physicians: 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 or <http://www.ortho.com>

(Or Optional Text For One Phone Number) Questions, Comments or Medical Information? Call: 1-800-225-2883 · <http://www.ortho.com>

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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 Solaris ®



[Label Subset For Turf]

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

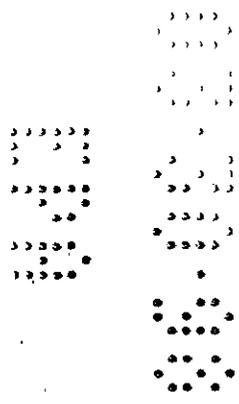
Triclopyr [3/20/98 Amendment], triethylamine salt.....	8%
Other Ingredients	92%

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

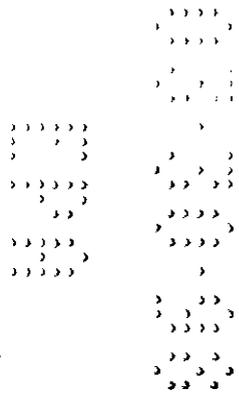
WON'T HARM COOL SEASON LAWN GRASSES*	KILLS TOUGH WEEDS
Bent, Buffalo, Fescues, Kentucky Blue, Rye or Zoysia	Chickweed, Clover, Ground Ivy (Creeping Charlie), Oxalis, Poison Ivy, Speedwell (Veronica), Wild Violet
See inside label for many more weeds	

- Not for use on Bermuda lawns.

Also combine with Weed-B-Gon® Lawn Weed Killer₂ 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
<p>Amount to Use: [3/20/98 Amendment] 4 tsp 1 fl oz per gallon of water for each 200 sq ft</p> <ul style="list-style-type: none"> When using Ortho Dial'n Spray: Set dial to 4 tsp 1 oz. Add 4.6 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
<p>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.</p> <ul style="list-style-type: none"> 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
<p>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.</p> <ul style="list-style-type: none"> When using Ortho Dial'n Spray: Set dial to 1 1/2 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)

[3/20/98 Amendment]

APPLICATOR	PRODUCT TO USE	AREA TO TREAT SQ FT
Tank Sprayer	Fill to Line 1 four <u>3 one</u> times (4 tsp <u>1 fl oz</u>). Add to 1 gal of water.	200 (20 X 10)
Ortho Dial'n Spray Hose-End Sprayer	Fill to Line 4 two <u>three</u> times (4 <u>6 fl oz</u>). DO NOT add water. Set dial to 4 tsp <u>1 oz</u> and spray.	1200 (20 X 60)

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 or <http://www.ortho.com>

(Or Optional Text For One Phone Number) Questions, Comments or Medical Information? Call: 1-800-225-2883 · <http://www.ortho.com>

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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 Solaris ®

