

239-2491

10/5/1998

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Please read instructions on reverse before completing form.

Form Appi OMB No. 2070-0060. Approval expires 2-28-95



United States Environmental Protection Agency Washington, DC 20460

Registration Amendment Other

OPP Identifier Number 265269

Application for Pesticide - Section I

1. Company/Product Number: 239-2491
2. EPA Product Manager: James Tompkins
3. Proposed Classification: None
4. Company/Product (Name): Brush-B-Gon Brush Killer
5. Name and Address of Applicant: The SOLARIS Group of Monsanto, P.O. Box 5006, San Ramon, CA 94583-0906
6. Expedited Review: In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section II

Amendment - Explain below. Resubmission in response to Agency letter dated. Notification - Explain below. Final printed labels in response to Agency letter dated. "Me Too" Application. Other - Explain below. NOTIFICATION OCT 5 1998

Explanation: Use additional page(s) if necessary. (For section I and Section II.) Notification: Add label claims, reformat Use Directions for increased clarity, and to update contact information. "This amendment is consistent with the provisions of PR Notice 95-2, 97-5 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product."

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, 2. Type of Container: Metal, Plastic, Glass, Paper, Other (Specify)
3. Location of Net Contents Information: Label, Container
4. Size(s) Retail Container
5. Location of Label Directions
6. Manner in Which Label is Affixed to Product: Lithograph, Paper glued, Stenciled, Other

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) Name: Grace D. Bourke, Title: Registration Specialist, Telephone No.: 925-355-3336
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: Grace D. Bourke
3. Title: Registration Specialist
4. Typed Name: Grace D. Bourke
5. Date: September 14, 1998
6. Date Application Received (Stamped)

20/15

MONSANTO

Food · Health · Hope



September 14, 1998

MONSANTO COMPANY
NUTRITION AND CONSUMER SECTOR
LAWN & GARDEN
2527 CAMINO RAMON, SUITE 200
SAN RAMON, CALIFORNIA 94583
PHONE (510) 355-3300
FAX (510) 355-3530

Mr. James A. Tompkins, PM 25
OPP Mailroom (7505C)
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Tompkins,

The Lawn and Garden Division of Monsanto Company is submitting a notification (OPP 265269) for Brush-B-Gon Brush Killer, EPA Reg. No. 239-2491 to add label claims, reformat Use Directions for increased clarity, and to update contact information.

To assist in identifying the changes, edits are marked with a line in the left margin and with the date of this notification [9/14/98 Notification]. New text is underlined. Deleted text is crossed out. Additionally, the first copy of the label has the edits highlighted in yellow.

Thank you very much for your assistance. If you have any questions, I can be reached at 925-355-3336.

Sincerely,

Grace D. Bourke
Registration Specialist

Handwritten scribbles and marks at the bottom right of the page.

ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

[ICON] OUTDOOR USE ONLY

[ICON] Water Based

ABN: ORTHO® Brush-B-Gon® Poison Ivy, Poison Oak & Brush Killer,

ABN: ORTHO® Weed-B-Gon® Oxalis, Clover & Chickweed Killer

ABN: ORTHO® Weed-B-Gon® Chickweed, Clover & Oxalis Killer

[Editing Note: Claims for Chickweed, Clover & Oxalis are under the "Turf" subset labeling.]

Makes 16 Gal Spray [1/2 GAL size]

Makes 8 Gal Spray [Quart size]

Makes 4 Gal Spray [Pint size]

Great Value – 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 - roots and all.

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

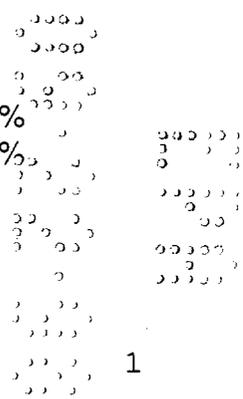
Triclopyr, triethylamine salt 8%

Other Ingredients 92%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional precautionary statements.



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ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

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.

Kills the toughest brushy weeds. It works systemically killing weeds right down to the roots.

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: Causes moderate eye irritation. Avoid contact with 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

<p>Product Facts</p> <p>KILLS Including: Blackberries, Black Cottonwood,</p> <p>WEEDS 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</p>

ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

WHERE • Around homes, cabins & other buildings

TO USE • Along fences & trails

AMOUNT

TO USE 4 fl oz (1/2 cup) per gal of water

Product Information Call 1-800-225-2883 or
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 ·www.ortho.com

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
Brazilian Pepper		
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 clarity]

WHEN TO APPLY

- Apply when weeds are 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.

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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 (1/2 cup) to 1 gal of water.
Ortho® Dial'n Spray® [Illustration] <ul style="list-style-type: none"> • Set dial to 4 oz. • For each gal of spray add 4 fl oz (1/2 cup) 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 8 fl. oz = 1 cup

HOW TO APPLY

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

To Kill Stumps/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.

To Kill Vines/For Vines

- If weeds are growing up poles, fences, or tree trunks with mature bark, spray to thoroughly cover weeds up to a height of 3 to 4 feet/ft. Tree bark is mature if you scratch the bark with your fingernail and do not find any green tissue.
- If weeds are climbing shrubs or green-barked trees, cut weeds 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.

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ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

- 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/1/2 cup). 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

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ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

Turf Subset Label For:

ABN: ORTHO® Weed-B-Gon® Oxalis, Clover & Chickweed Killer

ABN: ORTHO® Weed-B-Gon® Chickweed, Clover & Oxalis Killer

CONCENTRATE

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

Water Based

[9/14/98 Notification] NEW/NOW

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]

[9/14/98 Notification: Add label claims] Also Kills Creeping Charlie, Ground Ivy & Other Tough Weeds. Won't Harm Lawns. Special formula for control of tough lawn weeds. Weed-B-Gon Chickweed, Clover & Oxalis Killer kills weeds right down to the roots without harming lawns.

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, 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

12/01/15

ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

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: 1 fl oz (2 Tbs) per gallon of water for each 200 sq ft

- When using **Ortho Dial'n Spray**: Set dial to 1 oz. Add 6 fl oz (12 Tbs) to sprayer jar. DO NOT add water. Spray evenly over 1200 sq ft until jar is empty. [9/14/98 Notification: Add Tbs for easier use]

How to Apply

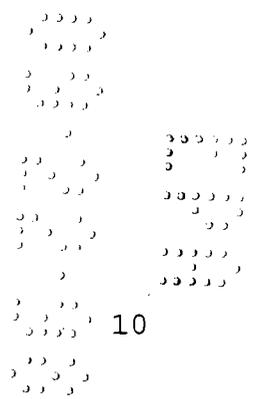
- To treat entire lawn: Use a tank or hose-end sprayer. Measure lawn. Calculate square feet by multiplying length times width. Spray evenly over measured area.
- To spot treat individual weeds in lawn: Use a tank sprayer.
- If an ornamental shrub or tree is in the lawn, keep spray off foliage and exposed 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.



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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 /<u>Weed-B-Gon Chickweed, Clover & Oxalis Killer</u> + 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 (<u>6 Tbs</u>) of this product /<u>Weed-B-Gon Chickweed, Clover & Oxalis Killer</u> + 6 fl oz (<u>12 Tbs</u>) 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)

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

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[9/14/98 Notification: Optional format of text]

FOR BEST RESULTS	
MEASURE [illustration / walking man]	<ul style="list-style-type: none"> • <u>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.</u> • <u>To spot treat individual weeds in lawn: Use a tank sprayer.</u>
MOW [illustration/ mower]	<ul style="list-style-type: none"> • <u>Avoid mowing 1 to 2 days after application.</u>
WATER [illustration /hose]	<ul style="list-style-type: none"> • <u>If lawn needs watering, water thoroughly before application.</u> • <u>Rain or watering 24 hours after application will not wash away effectiveness.</u>
WHEN TO APPLY [illustration / weather]	<ul style="list-style-type: none"> • <u>Spray when:</u> <ul style="list-style-type: none"> - <u>weeds are actively growing</u> - <u>temperature is below 90°F</u> - <u>air is calm to prevent drift to desirable plants</u> • <u>Reapplication can be made in 2 to 3 weeks if necessary.</u> • <u>Newly seeded lawn can be sprayed after second mowing.</u>

[9/14/98 Notification] **IMPORTANT**

Not for use on Bahia, Bermuda, Centipede, Kikuyu or St. Augustine lawns. Not for use on or around fruits, vegetables or flowers. If an ornamental shrub or tree is in the lawn, keep spray off foliage and exposed roots.

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 225-2883 [9/14/98]

[Notification]

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

