

239-2491

3/18/1999

10f8

MAR 18 1999

Grace D. Bourke
The Solaris Group of Monsanto
P.O. Box 5006
San Ramon, CA 94593-0906

Dear Ms. Bourke:

Subject: Revised Label
Ortho Brush-B-Gon Brush Killer
EPA Registration No. 239-2491
Your Submission Dated March 3, 1999

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. EPA has waived all requirements for submitting efficacy data unless the pest poses a threat to human health. However, each registrant must ensure through testing that all of their label claims are supported including "Rainproof in (2) hours for control that won't wash away".

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

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

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ORTHO® BRUSH-B-GON® Brush Killer

EPA Reg. No. 239-2491

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

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

ABN [3/25/98]: ORTHO® Weed-B-Gon® Chickweed, Clover & Oxalis Killer

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

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 18 1999**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
239-2491**

[ICON] OUTDOOR USE ONLY

ICON] Water Based

Makes 4 / 8 / 16 Gal Spray [pint / quart / ½ gallon]

Great Value – Concentrate makes 4 / 8 / 16 gallons spray

Value Priced – Concentrate makes 4 / 8 / 16 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

[6/10/98 Notification] 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

[3/3/99 Amendment] Rainproof in (2) hours for control that won't wash away.

FOR HOME USE ONLY / Residential 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

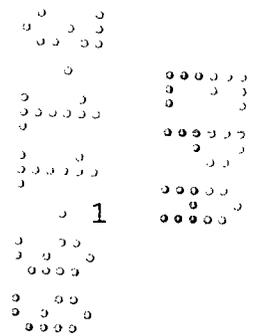
Triclopyr, triethylamine salt 8%

Other Ingredients 92%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional precautionary statements.



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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

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.

[6/10/98 Notification] 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 [illustration]
To open: squeeze cap while unscrewing

Peel open for use directions and further information.

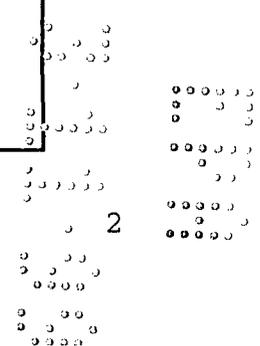
PULL HERE TO OPEN LABEL PRESS TO RESEAL
Open Resealable Label For Directions & Precautions
PEEL HERE / PRESS TO RESEAL
Open Resealable Label For Directions & Precautions

[7/13/98 Amendment] 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.

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.

Product Facts
KILLS Including: Blackberries, Black Cottonwood,
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



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WHERE • Around homes, cabins & other buildings
TO USE • Along fences & trails
AMOUNT
TO USE 4 fl oz (1/2 cup & 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? <u>[6/10/98 Notification]</u> Call: 1-800-225-2883 http://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	

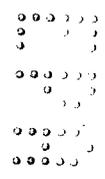
WHEN TO APPLY: Apply when vegetation is actively growing. Apply only when the air is calm to prevent drift. [3/3/99 Amendment] Rainfall within 24 hours may reduce effectiveness. [3/3/99 Amendment: Appears below.] Do not use on or around edible feed or food crops.

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

WHEN TO APPLY

- Apply when weeds are leafed out and actively growing.
- Apply when air is calm to prevent drift to desirable plants.
- [3/3/99 Amendment] Rain within 24 hours after application may reduce effectiveness.
- [3/3/99 Amendment] Rain 2 hours after application will not 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



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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 (1/2 cup 8 Tbs) 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

[3/3/99 Amendment]

1 Tablespoon (Tbs) = 3 teaspoons (tsp)

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

1 Cup = 8 Fluid Ounces (fl oz)

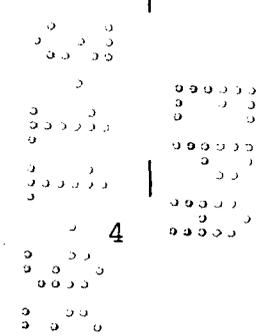
HOW TO APPLY

- 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 is 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 is 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



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- If weeds are is growing up poles, fences, or mature 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 is climbing a shrubs or green-barked trees, ~~to avoid damage to shrub,~~ 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.

- 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/ ½ 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)



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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

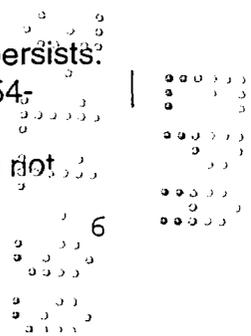
[7/13/98 Amendment] CAUTION: Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling.

[3/3/99 Amendment: Delete duplicate text, appears under Use Directions.] [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 1-800-225-2883 or 1-800-454-2333.

ENVIRONMENTAL HAZARDS: Do not apply directly to any body of water. Do not



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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
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