

PM25 239-2515

518198

1/16

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
 Other

OPP Identifier Number
262124

Application for Pesticide - Section I

1. Company/Product Number 239-2515	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted <input checked="" type="checkbox"/>
4. Company/Product (Name) Ortho Poison Ivy and Poison Oak Control	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) The Solaris Group of Monsanto P.O. Box 5006 San Ramon, Ca 94593-0906 <input type="checkbox"/> Check if this is a new address	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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION MAY - 8 1998
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification: Update common name to Triclopyr, triethylamine salt, per phone conversation with James Tompkins and PR Notice 97-5. Add new label claim, optional 2nd 800 number in the Note to Physicians statement and add the option of changing various words from singular to plural tense.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes" Unit Packaging wgt. No. per container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify: _____)
* Certification must be submitted		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Stephen R. Cornes	Title Registration Specialist	Telephone No. (Include Area Code) 510 355-3336
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamp)
2. Signature 	3. Title Registration Specialist	
4. Typed Name Stephen Cornes	5. Date 04/20/98	

2/6

MONSANTO

Food · Health · Hope



Stephen R. Cornes
Registration Specialist

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

April 20, 1998

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

Dear Mr. Tompkins:

The Solaris Group of Monsanto Company is submitting Notification (OPP 262124) for "ORTHO[®] Poison Ivy & Poison Oak Control," EPA Reg. No **239-2515** to:

1. Add one additional front label claim, "Rain proof in 2 hours". This claim is currently approved in the section of the label describing how the product works. "Rainfall 2 hours after treatment will not wash away effectiveness."
2. The common name in the Ingredient Statement is being changed from Triclopyr to Triclopyr treithylamine salt.
3. The option of using either the singular or plural form has been added to several sections of the label.
4. A second phone number in the "Note to Physicians" statement has been added.

To assist you in finding these changes, all edits are preceded with the Notification date in brackets [4/17/98 Notification]. New text is underlined and deletions are ~~crossed out~~.

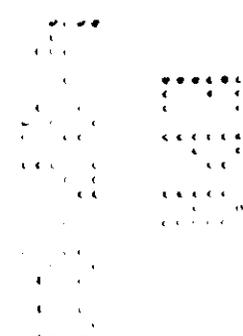
Please call me at (510) 355-3336 if you have any questions concerning this Notification.

Sincerely,

Stephen R. Cornes

Attachments: (1) 8570-1
(1) label

CC: Files



316

NOTIFICATION

MAY - 8 1998

[Icon]Outdoor Use Only
[water drop icon]water based

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

Kills Poison Ivy & Poison Oak

Also Kills Brushy Weeds as Listed

Kills Stumps

Kills Poison Ivy, Poison Oak, Kudzu and other woody vines

Kills 60 of the toughest weeds – roots and all

Kills Poison Ivy & Poison Oak, Kills Poison Ivy, Kills Poison Oak, Kills Blackberries, Kills Kudzu, Controls Poison Ivy & Poison Oak, Controls Poison Ivy, Controls Poison Oak, Controls Blackberries, Controls Kudzu

Kills Woody Plants, Weeds, Vines, Brambles and Stumps – Roots and All Including

•Blackberries •Poison Ivy • Kudzu •Poison Oak, With Foam Marker

The Tough Weed Solution

Kills Brushy Weeds & Stumps

[4/17/98 Notification] Rain Proof in 2 hours

Active Ingredient

Triclopyr [4/17/98 Notification] triethylamine salt 0.70%

Inert Ingredients..... 99.30%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements.

NET WT 19 OZ (1 LB 3 OZ) / 538 g

Product Facts	
KILLS	Including: Blackberry,
WEEDS:	Chinaberry, Elderberry, Elm, Honeysuckle, Kudzu, Lantana, Mustang Grape, Oak, Peppervine, Persimmon, Poison Ivy, Poison Oak & Willow
WHERE TO USE	• Around homes, cabins & other buildings • Along fences & trails • In other non-garden areas

4/6



Product Information

Call 1-800-225-2883 or
<http://www.ortho.com>

Medical Information

Call 1-800-454-2333

[4/17/98 Notification] (OR)

Questions, Comments or Medical Information

Call 1-800-225-2883 <http://www.ortho.com>

Gives complete control of poison ivy and poison oak around homes, cabins, buildings, fences, trails, and other non-crop areas. Also kills brushy weeds such as Lantana, Elderberry, Pin Oak, Japanese Honeysuckle, Mustang Grape, Oak, Brambles, Blackberry, Chinese Elm, and Peppervine. Kills stumps and prevent regrowth from stumps of trees such as Chinaberry, Black Jack Oak, Willow, Persimmon and Elm. A foam marker has been added to aid in coverage of foliage and stems. Rainfall 2 hours after treatment will not wash away effectiveness.

Gives complete control of poison ivy and poison oak around homes, cabins, buildings, fences, trails, and other non-crop areas. Also kills brushy weeds such as Lantana, Elderberry, Pin Oak, Japanese Honeysuckle, Mustang Grape, Oak, Brambles, Blackberry, Chinese Elm, and Peppervine. Kills stumps and prevent regrowth from stumps of trees such as Chinaberry, Black Jack Oak, Willow, Persimmon and Elm. A foam marker has been added to aid in coverage of foliage and stems. Rainfall 2 hours after treatment will not wash away effectiveness.

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.

WHEN TO APPLY

Apply when vegetation is leafed out and growing.

Important Do not use on or around edible feed or food crops.

HOW TO APPLY

Point arrow on button toward red mark at top of can to direct spray.

Shake can before use. Spray to cover leaves. Also apply to trunks, limbs, and stems of vines. The white foam marker will indicate when leaves have been thoroughly covered.

When poison ivy is growing up poles, fence posts or trunks of trees, spray all leaves around the base and up to a height of 3 to 4 feet. If poison ivy is growing on privet or lilac to avoid damage to these plants, cut ivy vines at base and spray cut surface.

Under summer weather conditions, treated plant leaves turn brown in 2 to 6 weeks after spraying. The chemicals are translocated throughout the entire plant, killing roots and tops.

Alternate "How To Apply" & "When To Apply" text

HOW TO APPLY

- Point arrow on button toward dot on top of can.
- Shake can before use.
- Spray weed **[4/17/98 Notification] (s)** to thoroughly cover foliage, stems and trunk.
- Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns.
- If desirable plant is accidentally sprayed, rinse off immediately with water.

WHEN TO APPLY

- Apply when weed **[4/17/98 Notification] (s)** is/are leafed out and actively growing.
- Apply when air is calm to prevent drift to desirable plants.
- Rain 2 hours after application will not wash away effectiveness.
- Weeds usually turn brown 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.

STUMP KILLING: Apply to freshly cut stump and to area 3 to 6 inches below cut. This product is non-selective. Do not apply to or allow drift to contact desirable vegetation. Do not apply when drift may occur. In case of accidental contact with desirable foliage, immediately rinse off with water.

IMPORTANT: Dead poison ivy and poison oak can cause skin irritation. Avoid any contact with bare arms or face. Do not burn dead poison ivy or poison oak stems or foliage. Smoke from burning poison ivy and poison oak has caused severe injury to skin or to lungs when inhaled. **[4/17/98 Notification] (And/Or) Do not use on or around edible feed or food crops. (Alternate location for text)**

Alternate Stump & Vine text

For Stumps /To Kill Stumps

- Apply to the entire freshly cut stump, including the cut surface, remaining trunk & exposed roots.

For Vines [4/17/98 Notification] /To Kill Vines

- If weed is/weeds are/vine/vines are growing up poles, fences or mature tree trunks, spray to thoroughly cover weed/vine up to a height of 3 to 4 feet.
- If weed is/weeds are/vine is climbing a shrub or immature (green) tree trunk, to avoid damage to shrub these plants, cut weed/vine at base & treat as directed for stumps.

STORAGE AND DISPOSAL

STORAGE: Store in a secure, preferably locked storage area away from heat or open flame.

DISPOSAL: CONTAINER-Replace cap and discard container in trash. Do not puncture or incinerate.

[OPTION 1 IF LABEL SPACE CONSTRAINT]

CONTAINER-Replace cap and discard container in trash. Do not incinerate or puncture. [OPTION 2 PREFERRED IF SPACE AVAILABLE-USE IN CONJUNCTION WITH STEEL RECYCLING SYMBOL]

CONTAINER-This container may be recycled in the few but growing number of communities where (Steel) aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, wrap the container and discard in the trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Keep out of reach of children. [Reentry Icon] People and pets may enter treated area after spray has dried. Note to Physicians: Emergency Information call 1-800-454-2333 [4/17/98 Notification] (OR) 1-800-225-2883.

ENVIRONMENTAL HAZARDS: Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS: Contents under pressure Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F. may cause bursting.

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.certo.com>

®Trademark of Monsanto Company
©Monsanto Company 1994

Federal regulations prohibit CFC propellants in aerosols.

[LOGO]: CONTAINS NO CFCs WHICH NO CFCs
DEplete THE OZONE LAYER

Manufactured for
The SOLARIS Group of
Monsanto Company
P.O. Box 5008
San Ramon CA 94583-0808
Form RS745-A
Product 1000-89
EPA Reg. No. 239-2515
EPA Est. 58996-MO-1^A
Made in USA

Solaris®