



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

9-26-05

Charles Levey
The Scotts Company
14111 Scottslawn Road
Marysville, OH 43041

Subject: Alternate CSF & Efficacy Data Review (EPA Reg. 239-2516 ORTHO Fence & Grass Edger Formula II)

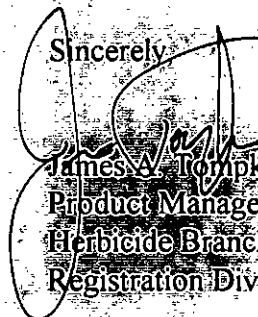
Dear Mr. Levey:

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

1. To the label the acid equivalent of the active ingredient glyphosate needs to be added as a substatment to the ingredients list and "contains petroleum distillates, xylene, or xylene aromatic solvents" must be added to the label. The physical/chemical hazards statement must be revised to include "Combustible. Do not use or store near heat or open flame."
2. To the label remove the following claims "Starts working immediately, Starts to kill immediately, and Starts working on contact"
3. The "Alternate CSF #G" is acceptable.

If you have any questions please call Erik Kraft at 703-308-9358

Sincerely,



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

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ORTHO® Fence & Grass Edger Formula II

[ICON OUTDOOR USE ONLY]

Active Ingredients

Glyphosate, isopropylamine salt.....	0.25%
Oxyfluorfen.....	0.25%
Other Ingredients	99.50%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional precautionary statements.

NET CONTENTS 1 gal / 3.78 L
NET CONTENTS 1.33 GAL / 5.03 L

ACCEPTED
with COMMENTS
in EPA Letter Dated

9-26-85
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

239-2516

ORTHO®Fence & Grass Edger Formula II

Gives complete kill of weeds and grasses and prevents weed and grass seeds from sprouting for up to 4 months. Can be used over root zones without harming ornamental plants.

WHERE TO USE: Apply only where no vegetation is desired, such as driveways, along fences, sidewalks, walkways, patios, curbs, gutters, landscaped areas, and even cracks in sidewalks.

DO NOT USE IN VEGETABLE GARDENS.

Peel open for use directions and further information

☞PULL HERE TO OPEN LABEL PRESS TO RESEAL

Questions, Comments or Medical Information call 1-800-225-2883

[Gives complete kill of weeds and grasses and prevents weed and grass seeds from sprouting for up to 4 months. Can be used over root zones without harming ornamental plants.]

-OR-

[Provides complete kill of weeds (and grasses) PLUS prevents new weeds (and grasses) from growing for up to 4 months. Can be used in landscape[d] areas (over root zones) without harming ornamental plants (trees or shrubs).]

-OR-

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[[Ortho GroundClear SuperEdger PLUS is] Specially formulated to kill weeds and grasses PLUS prevent new growth for up to 4 months. Use to eliminate existing weeds [and grasses] OR use in areas where you want to prevent weeds [and grasses] from even growing.]

Product Facts	
Treats up to 266 sq ft [for 1.33 Gal size] [or 200 sq ft for 1 Gal size]	
KILLS WEEDS	Unwanted weeds & grasses [weed icon]
PREVENTS WEEDS	For up to 4 months
WHERE TO USE	<ul style="list-style-type: none"> • Driveways, sidewalks, patios, curbs and gutters • Along fences • In landscape[d] areas (except vegetable gardens)
Questions, Comments or Medical Information	call 1-800-225-2883 www.ortho.com

WHERE TO USE:

[Apply only where no vegetation is desired, such as driveways, landscape[d] areas [around trees and shrubs], along fences, sidewalks, walkways, patios, curbs, gutters and even cracks in sidewalks.]

- OR - [Apply only where no vegetation is desired, such as driveways, PLUS landscape[d] areas, PLUS fence lines, PLUS sidewalks, PLUS walkways, PLUS patios, PLUS curbs, PLUS gutters and even cracks in sidewalks.]

DO NOT USE ON OR AROUND EDIBLE FEED OR FOOD CROPS.

DIRECTIONS FOR USE

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

WHERE TO USE

Apply only where no vegetation is desired, such as driveways, landscape[d] areas, [around trees and shrubs] along fences, sidewalks, walkways, patios, curbs, gutters and even cracks in sidewalks.

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DO NOT USE IN VEGETABLE GARDENS.

WHEN TO APPLY

Apply to actively growing weeds and grasses. Visible effects will occur within 3 to 5 days with complete kill in 2 to 4 weeks.

If rainfall occurs within 6 hours, repeat treatment may be required. To avoid drift to desirable plants, apply only when air is calm. If leaves of desirable plants are accidentally sprayed, immediately wash off plants with water.

-----OPTION 1 Sprinkle-Pour Spout (1 Gal.)-----

HOW TO APPLY/USE

Remove cap and be certain that applicator head is screwed on firmly. Invert jug and apply to thoroughly cover unwanted vegetation. For killing vegetation around trees, shrubs and buildings and edging around lawns, fences and sidewalks, hold the jug about 2 to 6 inches from the area to be treated depending upon desired width. The width of the spray pattern may be adjusted by either raising or lowering the jug. One gallon will cover a band 2 inches wide and 1200 feet long.

For controlling weeds in walks and patios, hold jug at about waist height away from body to avoid contact with skin or clothing. Walk slowly making sure that all weeds are thoroughly covered. Thoroughly cover all cracks and joints in sidewalks, driveways and patios.

----- End of OPTION 1 -----

-----OPTION 2 - Pull 'N Spray (II) (PNSII) (1 gal or 1.33 gal)-----

(Illustration #1)

- Remove sprayer from side carrier and unwrap hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks.
- Flip up spout. Spout must remain up while spraying

(Illustration #2)

- Twist nozzle at end of sprayer to desired spray pattern (narrow, medium or wide stream).

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(Illustration #3)

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer.

(Illustration #4)

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

HOW TO APPLY/USE

- Follow illustrations and instructions above.
- For best results pull out slowly and hold for two (2) seconds.
- Spray to thoroughly cover unwanted weeds and grasses or spray to thoroughly cover areas where you want to prevent weed and grass growth.
- Do not spray plants or grasses you like - they may die too.
- When treating around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

-----End of OPTION 2 -----

-----OPTION 3 Pull 'N Spray 1(1 gal or 1.33 gal) -----

(PNS I EPA Required Language)

(FRONT PANEL - LARGE TYPE, BOLD FACE)

DO NOT UNSCREW CAP. DO NOT REFILL CONTAINER.

(wand sticker)

IMPORTANT! Follow directions and illustrations on back to assemble and use Pull N' Spray correctly.

(Illustration) 1. Detach yellow wand and pull plug and tubing from bottom of wand. Insert plug firmly into "T-handle" until it clicks. ONCE CONNECTED, PLUG CANNOT BE REMOVED WITHOUT DAMAGING "T-HANDLE."

(Illustration) 2. Slide white strip on cap, then grab "T-handle" and pull all the way up. JUST PULL UP -- NO NEED TO PUMP.

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(Illustration) 3. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern.

UP (Illustration) 4. Pull "T-handle" again as needed to continue spraying. JUST PULL - NO NEED TO PUMP. When finished, push "T-handle" gently down to cap and follow storage instructions.

HOW TO APPLY/USE:

- Adjust nozzle on wand to deliver a narrow or wide spray. Pull up on handle - DO NOT PUMP. Follow illustrations and instructions above. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern. Spray to thoroughly cover unwanted weeds and grasses or spray to thoroughly cover areas where you want to prevent weed and grass growth. When treating around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water. Pull "T-handle" again as needed to continue spraying. **JUST PULL UP - NO NEED TO PUMP.**

-----END OF OPTION 3-----

WEEDS CONTROLLED:NOTE: For best control, apply to actively growing, immature weeds. Heavy lawn grass or well established difficult to control perennial weeds, such as Bermudagrass, Nimblewill, Dandelion, or Canada Thistle may require a repeat application if regrowth occur.

GRASSES	
Bahiagrass	Orchardgrass
Bentgrass	Perennial Ryegrass
Bermudagrass	Quackgrass
Bluegrass	Sandspur
Bromegrass	St. Augustinegrass
Crabgrass	Tall Fescue
Creeping Bentgrass	Torpedograss
Diffuse Lovegrass	Whitetop
Fescue	Wild Barley
Johnsongrass	Yellow Nutgrass
Maiden Cane	Zoysia

BROADLEAF WEEDS

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Bindweed	Knotweed
Black Medic	Lambsquarters
Blue Toadflax	Little Bitter Cress
Brassbuttons	London Rocket
Broadleaf Plantain	Mallow
Bur Clover	Mayweed
Canada Thistle	Mouseear Chickweed
Chickweed	Nimblewill
Common Groundsel	Oldenlandia
Common Plantain	Oxalis
Creeping Beggarweed	Pennsylvania Smartweed
Creeping Charlie	Pennywort
Curly Dock	Prostrate Spurge
Dandelion	Primrose
Dog Fennel	Puncture Vine
Evening Primrose	Ragweed
False Dandelion	Shepherdspurse
Fennel	Smooth Cat's Ear
Fiddleneck	Sowthistle
Filaree	Spotted Spurge
Florida Pusley	Tansy Ragwort
Garden Spurge	White Clover
Henbit	Wild Morningglory

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. 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.

PESTICIDE DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

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

FIRST AID: [first aid symbol +]

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the

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first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Note to Physicians: Emergency Information-call 1-800-225-2883.

ENVIRONMENTAL HAZARDS: Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

The ORTHO Guarantee

If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

Questions, Comments or Medical Information call 1-800-225-2883

Manufactured for
The ORTHO Group
P.O. Box 190
Columbus, OH 43040
EPA Reg. No. 239-2516
EPA Est. 239-IA-3
Made in USA

• APPENDIX

Applicator Claims

- [Quick &] Easy to Use
- No Leaks or Mess
- EASY-TO-USE [Store]
- Pull 'N Spray
- The easier (easy) way to spray :
- No [More] Hand Fatigue
- No more squeeze, squeeze, squeeze
- 33% more than 1 gallon size
- Precise control for maximum accuracy
- Consistent spray for maximum accuracy
- No more tired hands
- Revolutionary [new] applicator

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- Change the way you spray
- Ideal for large or small jobs [areas]
- Great for large or small jobs [areas]
- Ready-to-Use
- Precise control—sprays only what you want
- Adjustable spray nozzle for maximum control
- Adjustable spray pattern for maximum control
- Cut your time spent spraying in half
- You're always ready to spray
- It's always ready to spray
- Targets weeds in tight places
- Save [s] time and energy
- One pull [delivers] [=] 34 trigger sprays
- Improved [Applicator]!/Improved [Application]!
- Improve Applicator System! [Device]!/Improved Application System! [Device!]
- Improved [!]
- NEW
- NOW
- No pumping, just pull
- Exclusive [technology]
- Patented [technology]
- No Mixing, No (or) Measuring
- [water droplet] water based
- Convenient Applicator Top

Formula Claims

- Long-lasting [formula] (weed [and grass] control)
- Ideal (great) for use in landscape[d] areas
- For maximum weed [and grass] control [in landscape[d] (mulched) areas] - use [Ortho GroundClear SuperEdger PLUS] before spreading (applying) (putting down) mulch around trees, shrubs and in landscape[d] areas.
- Use before putting down (landscaping with) mulch
- Provides long-term weed [and grass] control
- Use around trees and shrubs (in landscape[d] areas) to prevent weed growth (weeds from growing)
- Use to edge (It edges) (It's an edger) (Use as an edger) PLUS so much more!
- Keeps (prevents) weeds [and grasses] from growing in cracks [and joints] in sidewalks, driveways and patios
- Kill and prevent weeds before mulching (putting down mulch)
- [For] Use on driveways, sidewalks, patios, along fence lines and around trees & shrubs

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- [For] Use on driveways, sidewalks and patios, PLUS along fence lines, PLUS around trees & shrubs
- Dual-action [formula]
- READY-TO-USE
- NO MIXING
- Spray-Ready
- Before and After
- 2-WAY ACTION - Kills Weeds & Grasses, Roots & All - Prevents Weed Seeds from Sprouting for up to 4 Months
- Can be Used Over Root Zones Without Harming Ornamental Plants.
- Kills Moss on Brick Walks and Patios
- Prevents re- (new) growth [for up to 4 months]
- Prevents growth [for up to 4 months]
- Prevents weeds [and grasses] from growing [for up to 4 months]
- Use in landscape(d) areas to kill [and prevent] weeds [for up to 4 months]
- Use in flower beds to kill [and prevent] weeds [for up to 4 months]
- Use around trees & shrubs to kill [and prevent] weeds [for up to 4 months]
- Use on driveways [and patios] to kill [and prevent] weeds [for up to 4 months]
- Prevents [weeds and grasses] [for up to 4 months] in landscaped areas
- Prevents [weeds and grasses] [from growing] [for up to 4 months]
- Kills weeds [for up to 4 months]
- Kills and prevents weeds and grasses [for up to 4 months]
- Blocks weed(s) [growth] [for up to 4 months]
- Works for up to 4 months
- Season long [weed] [and grass] control
- Kills weeds [and grasses] all season long
- Prevents weeds [and grasses] all season long
- Stops weeds [and grasses] from growing for up to 4 months
- Stops weeds [and grasses] all season long
- Works all season
- Up to 4 month extended weed and grass control
- Up to 4 month complete weed and grass control
- Lasts 33% longer
- 33% longer control
- Prevents [kills] weeds 33% longer
- Specially formulated to kill weeds [and grasses] [for up to 4 months]
- Keeps weeds from growing [for up to 4 months]
- Rainproof in hours [so you don't have to re-spray]
- Prevents [kills] weeds longer
- For use in landscape(d) areas

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- Special ingredient(s) prevents [kills] weeds [and grasses] [from growing] [for up to 4 months]
- Made [specifically] for use in landscape(d) areas
- Scientifically formulated to prevent [kill] weeds [and grasses] [for up to 4 months]
- Exclusive blend of ingredients
- Now with longer [weed] control
- New/Now
- Easy to use
- Requires no mixing, no measuring and no messy cleanup
- Great [ideal] for spot treatments
- Apply to landscaped areas to kill [prevent] weeds [and grasses]
- Protects against weeds [and grasses] [for up to 4 months]
- Up to 4 month control
- No weeds for up to 4 months
- [Up to 4 month] long-lasting [weed and grass control]
- Visible Results Overnight
- Overnight Results
- Fast Results
- Fast-acting formula
- Fast Acting – Long Lasting.
- [Results/Starts working/Starts to Kill/Visible [see] Results] in [4, 6, 8, 10, 12, 24] Hours
- Same Day [Visible] Results
- [See results/Starts to kill/Visible Results] in hours
- Speedy Results
- Starts working [immediately/overnight/on contact/in hours]
- Starts to kill immediately
- Weeds start dying in [4, 6, 8, 10, 12, 24] hours
- Works to the root(s) in [4, 6, 8, 10, 12, 24] hours
- Works in hours