

239-2638

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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 265270

Application for Pesticide - Section I

1. Company/Product Number 239-2638
2. EPA Product Manager James Tompkins
3. Proposed Classification None Restricted
4. Company/Product (Name) Roundup L & G Ready-to-Use Fast Acting Formula Grass & Weed Killer
5. Name and Address of Applicant The SOLARIS Group of Monsanto
6. Expedited Review

Section - II

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

Explanation: Use additional page(s) if necessary. Notification: Add additional label claims, edit the Use Directions for Pull N Spray applicator, correct typographical errors, delete American Zoological endorsement, update contact information, and reformat text for easier review.

Section - III

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

Section - IV

1. Contact Point Name Grace D. Bourke, Title Registration Specialist, Telephone No. 925-355-3336. Certification I certify that the statements I have made on this form... 2. Signature Grace D. Bourke, 3. Title Registration Specialist, 4. Typed Name Grace D. Bourke, 5. Date September 12, 1998.

OCT 5 1998

Roundup® L & G READY-TO-USE Fast Acting Formula Grass & Weed Killer
EPA Reg. No. 239-2638

[ABN] Roundup Ready-To-Use Weed & Grass Killer
 [ABN] Roundup Fence & Yard Edger

[Editorial Notes: Bracketed text is for internal use and will not appear on the printed label. Text in parenthesis is optional wording.]

[See Appendix for consolidated list of Roundup label claims and for label claims specific to the Roundup / Weed-B-Gon combination packaging.]

[graphics of weeds dying in 1-7 days]

[water droplet] water based

[9/12/98 Notification: Move claim to appendix for easier review] ~~Kills unwanted weeds and grasses, roots and all~~

[7/17/98 Notes: The following statements were rejected by the EPA on 11/17/97 and may NOT be used on labeling.] ~~Nobody kills more weeds. Roundup kills almost every weed. Roundup kills even tough weeds dead to the root. Roundup guarantees dead weeds. Roundup is the #1 weed killer in the world.~~

[9/12/98 Notification: Move claims to appendix for easier review]

~~[6/16/98 Notification]: No Root, No Weed, No Problem~~

~~Guaranteed results with one application.~~

~~Ready to use, no mixing. Covers xx sq ft [varies with container size]~~

~~Does not have soil activity~~

~~Spray weeds in and around fences, trees, driveways, flower beds, walkways, shrubs, and for lawn renovation. [This "lawn renovation" phrase not for 24 oz container size.]~~

~~This 24 oz bottle can be REFILLED with one tablet of Roundup Quik Stik Grass & Weed Killer. See Storage and Disposal section for more information. [For 24 oz container size only.]~~

This 24, 64, 128 or 170 fl oz bottle can be refilled using Roundup Concentrate Weed & Grass Killer or Roundup Super Concentrate Weed & Grass Killer. (See bottle label for specific instructions.)

[For Quick Connect Sprayer]

New package. See sprayer for Directions

1 [illustration] Remove this sprayer and pull cord ALL THE WAY OUT.

2 [illustration] Insert green plug into spout (on cap) until it clicks. THEN flip spout up.

3 [illustration] Open nozzle at end of sprayer.

[9/12/98 Notification: Alternate instructions for assembly of Quick Connect Sprayer, moved from below]

1. Remove sprayer and pull cord ALL THE WAY OUT.

2. Insert green plug into spout (on cap) until it clicks.

3. Flip up spout. Open nozzle at end of sprayer.

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[9/12/98 Notification: Claims moved to appendix]

[For Pull 'N Spray packaging]

[6/16/98]: NEW/NOW Fast & Easy Pressure/Tank Sprayer [illustrations]

NEW/NOW PULL 'N SPRAY

EASY TO ASSEMBLE (AND USE)

[9/12/98 Notification: Delete outdated text of Quick Connect Sprayer Assembly]

[Sticker on Sprayer] Unhook/lift up to remove sprayer. Pull [3-ft extension] cord/tubing

ALL THE WAY OUT.

POWERFUL CONTINUOUS SPRAY IN 3 SIMPLE STEPS/ASSEMBLY
INSTRUCTIONS

(1) picture — Insert white plug into [the] T grip/handle until it clicks.

(2) picture — Slide lock to open. Pull up once on T-Grip/handle.

picture — Push/Push button on sprayer/wand to start spraying.

[9/12/98 Notification: Directions for assembly of Pull 'N Spray wand]

1) Lift wand, pull out cord

2) Connect cord to handle, slide lock to open

3) Pull up handle. DON'T PUMP

and/or

1. Insert white plug into green handle until it clicks

2. Slide lock to open. Pull on green handle. Do not pump - just pull.

3. Push button to start spraying. Pull handle up again for continued spraying.

[9/12/98 Notification: Claims moved to appendix. Deleted American Zoological Association endorsement claims.]

New! Larger Size, Kills the root so weeds don't come back

See results in 24 hours, Kills the root.

Ornamentals and Flower Beds, Easy to use Applicator

Spot treatment for lawn replanting, Kills weeds and grasses, roots and all

All Purpose Weed & Grass Killer, New quick click sprayer

New quick connect sprayer, Quick & easy to use

No leaks or mess, Easy to store (see back for instructions)

Starts working overnight, Starts to kill overnight, Works overnight, Starts working in

hours, See results in hours, Starts to kill in the same day, Begins working in hours,

Starts to kill in hours, Works in hours

Kills weeds dead ... breaks down into natural materials. Rainproof in two hours for

control that won't wash away. New/New rainproof. New/New improved. Used by zoo's

to effectively control weeds. Now approved for use in vegetable gardens. Ideal for

vegetable garden weed control.

[9/12/98 Notification: Moved to appendix to consolidate with other [late] claims]

6/16/98 Pull Spray (PNS) claims

No More Tired/Achy Hands from/caused by Trigger Sprayers

No More Hand Fatigue/Cramping from/caused by Trigger Sprayers

Roundup® L & G READY-TO-USE Fast Acting Formula Grass & Weed Killer EPA Reg. No. 239-2638

- Fast and/easy application. Quickly covers large areas.
- The Ergonomic Sprayer.
- Now! Larger/Bigger Size
- Now 33% Larger than 1 Gallon Size.
- New/Now Refillable/Reusable Container/Tank Sprayer.
- Easy to use Tank Sprayer. Adjustable Sprayer.
- 3-ft extension cord/tubing enclosed [in sprayer].
- No pumping. Just Pull

KEEP OUT OF REACH OF CHILDREN

CAUTION

Read precautions and directions on back label.

Active Ingredient

Glyphosate [4/20/98 Notification] , isopropylamine salt 0.96%

[7/17/98 Non-notification] Other Inert Ingredients 99.04%

NET

6 fl oz,			30 fl oz		
24 fl oz	(1pt 8 fl oz)	(709 mL)	25.3 fl oz	(1 pt 9.3 fl oz)	(750 mL)
64 fl oz	(1/2 gal)	(1.89 L)	1/2 gal	3.6 fl oz	(67.7 fl oz) (2L)
128 fl oz	(1 gal)	(3.785 L)	1 gal	7.2 fl oz	(135.4 fl oz) (4L)
2 gal	(256 fl oz)	(7.75 L)	1.33 gal	(170 fl oz)	(5L)

[9/12/98 Notification: Moved to above to be with other assembly instructions]

[Text for QUICK CONNECT SPRAYER]

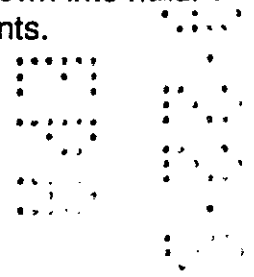
- (1) picture — ~~Remove sprayer. Pull cord ALL THE WAY OUT.~~
- (2) picture — ~~Insert green plug into spout (on cap) until it clicks.~~
- (3) picture — ~~Flip up spout. Open nozzle at end of sprayer.~~

Roundup Ready-To-Use is pre-mixed and pre-measured. It will kill almost all annual and perennial weeds, grasses and other unwanted plants. Ideal for tough to reach weeds found in flower beds and vegetable gardens. Use on driveways and walkways, or around fences, trees, flower beds, shrubs and other areas in your yard.

HOW IT WORKS

Roundup kills weeds by stopping the production of a substance found only in plants. It enters plants through foliage and moves systemically down to the roots. [9/12/98 Notification: Alternate text] Roundup will kill almost all annual and perennial weeds, grasses and other unwanted plants. Roundup enters plants through foliage and moves systemically to the roots, killing weeds by stopping the production of a substance found only in plants. Any product not absorbed by plants breaks down into natural materials. Roundup will not move in or on the soil to untreated plants.

CONTROLS ALL WEEDS AND GRASSES INCLUDING:



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Barnyardgrass, Bermudagrass, Thistle, Chickweed, Common Ragweed, Dandelion, Fescues, Johnsongrass, Clover and Yellow Nutgrass and many other annual and perennial grasses, weeds, sedges and brush.

[9/12/98 Notification: Deleted American Zoological Association endorsement claims.]
Used by American Zoo and Aquarium Association member zoos to effectively control weeds.

DIRECTIONS FOR USE:

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

Product Facts	
Container treats over 200 weeds. (Text for 24 oz container size)	
Container treats over 500 weeds. (Text for ½ gallon container size)	
Container treats over 1000 weeds. (Text for 1 gallon container size)	
<u>[6/16/98] Container treats more than/over 1300 weeds/390 sq ft [PNS 5L/1.33 gal]</u>	
<u>[4/20/98 Notification] Container treats over 1500 weeds. [6 liter size]</u>	
Kills Weeds	[illustrations] ALL TYPES OF WEEDS & GRASSES
Where to Use	<ul style="list-style-type: none"> • On walkways, patios & driveways • In flower beds & vegetable gardens • Around shrubs & trees • Along fences • For lawn renovation
<i>[This is an optional location, alternative location is above address]</i>	
☎ Product Info	
Call 1-800-225-2883 <u>[4/20/98 Notification] www.roundup.com</u>	
Medical Info	
Call 1-800-454-2333	
[or]	
☎ <u>Questions, Comments or Medical Information</u>	
<u>call 1-800-225-2883 www.roundup.com</u>	

[9/12/98 Notification: Move Edger use to consolidate with common text]

WHERE TO USE

Use as an edger along driveways, fences, cracks in sidewalks, and around ornamentals, trees and shrubs. Also use for larger areas such as brick and gravel walkways and patios. Roundup can be used over the root zone of desirable plants without injury.

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WHEN TO USE

Use anytime weeds and grasses are actively growing. Treated weeds usually show initial symptoms within hours and complete kill in 1 to 2 weeks. Larger more established weeds may take up to 4 weeks for a complete kill. Roundup works best in warm sunny weather with daytime temperature above 60° F. Reapply if it rains within 2 hours after application. If hard-to-control weeds are not killed within 4 weeks, reapply.

WHEN TO APPLY

- Apply when weeds are actively growing. [6/16/98]: Use anytime weeds [and/& grasses] are actively growing.
 - For best results apply during warm sunny weather (above 60° F).
 - Spray/Apply when air is calm to prevent drift to desirable plants.
 - Roundup is RAIN-PROOF™ in 2 hours. Rainfall 2 hours after application will not wash away effectiveness. [4/20/98 Notification] (or) RAIN-PROOF – Rain or watering 2 hours after application will not wash away effectiveness.
 - [6/16/98]: [Apply when weeds are small and/& before seeds form]. Weeds yellow usually begin to and wilt within hours with complete kill in 1 to 2 weeks. [9/12/98 Notification: Alternate text] Weeds usually begin to wilt within hours with complete kill in 1 to 2 weeks. Established weeds may require a repeat application.
 - All ornamental flowers, trees & shrubs may be planted **1 day after** application. [9/12/98 Notification: Move to consolidate with common text] Treated weeds usually show symptoms within 24 hours with complete kill in 1-2 weeks. Larger, more established weeds may take up to 4 weeks for a complete kill. Roundup works best in warm sunny weather with daytime temperatures above 60°F. Reapply if it rains within 2 hours after application or if regrowth occurs.

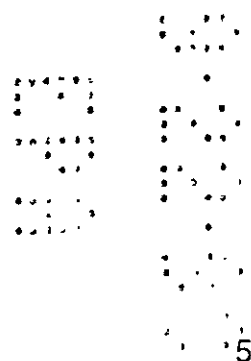
To treat individual weeds adjust the nozzle to a coarse spray. Spray when air is calm. Position sprayer tip approximately 1-2 feet from weeds and apply until completely covered.

IMPORTANT: Roundup is an all-purpose weed and grass killer which will kill almost all plants contacted. If necessary, use cardboard or plastic to shield desirable plants. If plants are accidentally sprayed, rinse off immediately with water. Do NOT use for spot weed control in lawns since Roundup kills all green plants, including lawn grass.

Sprayed areas can be replanted with ornamentals or flowers the 1 day after treatment.

HOW TO APPLY

- Adjust nozzle to a coarse spray.
- [6/16/98] [for PNS] - Adjust nozzle to deliver narrow or wide spray. Spray the weeds or grasses you want to kill until thoroughly wet.



9/12/98 Notification: Instructions for Pull 'N Spray

- Adjust nozzle on wand to deliver a narrow or wide spray. Pull up on handle - DO NOT PUMP. Spray the weeds or grasses you want to kill until thoroughly wet.
- When spot treating weeds in a flower or vegetable garden, shield desirable plants from drift with a sheet of cardboard or plastic. If desirable plant is accidentally sprayed, rinse off immediately with water.

[9/12/98 Notification: Instructions for Edger Applicator]

Remove top cap.

- Tighten the built-in sprinkler applicator.

To use as an edger:

- Turn jug upside down.
- Walk slowly holding jug 2 - 6 inches above the ground or weeds.
- Apply product to thoroughly cover unwanted vegetation.
- One gallon will cover a band 2 inches wide and 1200 feet long.

To control weeds in larger areas, such as brick or gravel walks and patios:

- Turn jug upside down.
- Hold jug about waist high to apply.
- Adjust the width of the spray pattern to cover weeds by raising or lowering the jug.

IMPORTANT: Do not spray plants or grasses you like - they may die too. Not recommended for spot weed control in lawns since Roundup kills lawn grasses.

REUSE AND REFILL INSTRUCTIONS:

Refill **ONLY** with Roundup Concentrate and Super Concentrate Weed & Grass Killer. Do not use this bottle for other products.

[24 fl oz]

To refill: Add 3 Tablespoons of Roundup Concentrate Weed & Grass Killer or 4 teaspoons of Roundup Super Concentrate Weed & Grass Killer to this empty 24 fl oz bottle. Then add 24 fl oz (3 cups) clean tap water and use according to the label directions. [or] To this empty container add 3 cups of water then 3 Tbs of Roundup Concentrate or 4 tsp of Roundup Super Concentrate.

[64 fl oz]

To refill: Add 7 Tablespoons (3 1/2 fl oz) of Roundup Concentrate Weed & Grass Killer or 3 Tablespoons (1 1/2 fl oz) of Roundup Super Concentrate Weed & Grass Killer to this empty 64 fl oz bottle. Then add 64 fl oz (1/2 gal) clean tap water and use

239-2638.N3

EPA Accepted November 17, 1997 (Reregistration)
Notifications of 2/17/98, 4/20/98, 6/16/98, 9/12/98

239-2638.N3

EPA Accepted November 17, 1997 (Reregistration)
Notifications of 2/17/98, 4/20/98, 6/16/98, 9/12/98

239-2638.N3

EPA Accepted November 17, 1997 (Reregistration)
Notifications of 2/17/98, 4/20/98, 6/16/98, 9/12/98

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according to the label directions. [or] To this empty container add ½ gallon of water then 3 ½ fl oz (7 TBS) of Roundup Concentrate or 1 ½ fl oz (3 TBS) of Roundup Super Concentrate.

[128 oz bottle]

To refill: Add 7/8 cup (7 fl oz) of Roundup Concentrate Weed & Grass Killer or 6 Tablespoons (3 fl oz) of Roundup Super Concentrate Weed & Grass Killer to this empty 128 fl oz bottle. Then add 128 fl oz (1 gal) clean tap water and use according to the label directions. [or] To this empty container add 1 gallon of water then 7 fl oz [4/20/98 Notification] (14 Tbs) of Roundup Concentrate or 3 fl oz (6Tbs) of Roundup Super Concentrate.

[1.58 gal (202 fl oz) container] [2/17/98 Notification]

Refill: To this empty container add 192 fl oz (1 ½ gal) of water then 10 ½ fl oz [4/20/98 Notification] (21 Tbs) of Roundup Concentrate or 4 ½ fl oz (9 Tbs) of Roundup Super Concentrate.

[Pull 'N Spray 170 oz bottle]

[9/12/98 Notification: Add alternate text and correct typographical errors.] For refilling: Remove the entire pumping mechanism. Prepare new product carefully following refill instructions. To refill: Add ~~9 40.5~~ fl oz (18 Tbs) of Roundup Concentrate Weed & Grass Killer or ~~4 4.5~~ fl oz (8 Tbs) of Roundup Super Concentrate Weed & Grass Killer to this empty 5 L (170 fl oz) bottle. Then add 5 L (170 fl oz) clean tap water and use according to the label directions. [or] [6/16/98 Notification] Remove the entire spraying system/pumping mechanism. To this empty container add 5 L (1 1/3 gal/gallon) of water then 9 fl oz (18 Tbs) of Roundup Concentrate or 4 fl oz (8 Tbs) of Roundup Super Concentrate. [9/12/98 Notification: Alternate text] To this empty container add 170 fl oz (1 1/3 gal) of water then 9 fl oz (18 Tbs) of Roundup Concentrate or 4 fl oz (8 Tbs) of Roundup Super Concentrate.

[9/12/98 Notification: Move reentry for easier use by consumer] [REENTRY ICON] People and pets may re-enter treated areas after spray has dried.

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[Alternate front label text and directions for ABN: Roundup Fence & Yard Edger]

ABN: Roundup Fence & Yard Edger

[9/12/98 Notification: Deleted since redundant with base label]

~~[graphics of weeds dying in 1-7 days]~~

~~[graphics of applicator in use]~~

[9/12/98 Notification: Claims moved to appendix, to Fence & Yard Edger header when specific to Fence & Yard Edger or to base label when general claims. Redundant text deleted.]

~~Water Based, Kills weeds and grasses, roots and all on contact.~~

~~Easy to Use Applicator, Convenient Applicator, No Measuring, Quick Kill, Total Kill, No Odor, The Container is the Applicator, Ready to use, no mixing. Covers 1200 Linear Feet, Use in and around fences, trees, driveways, ornamentals, patios, walkways, and shrubs. Built in applicator, Use along fences, driveways, walkways, around shrubs, trees, around ornamentals, Use over the root zones of trees, shrubs or desirable plants~~

~~[AZA LOGO] American Zoological Association species survival plan~~

~~No Root. No Weed. No Problem.~~

~~Kills the root so weeds don't come back~~

~~Roundup will kill almost all annual and perennial weeds, grasses and other unwanted plants. Roundup Fence & Yard Edger has a built-in applicator that makes it easy to use for trimming and edging along driveways and walkways, or around fences, trees, flower beds, shrubs and other areas in your yard. Roundup kills weeds by stopping the production a substance found only in plants. Any Roundup not absorbed by the plant breaks down into natural materials. Roundup will not move in or on the soil to untreated plants.~~

[9/12/98 Notification: Deleted redundant text] 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.~~

[9/12/98 Notification: Move to consolidate with common text] WHERE TO USE

~~Use as an edger along driveways, fences, cracks in sidewalks, and around ornamentals, trees and shrubs. Also use for larger areas such as brick and gravel walkways and patios. Roundup can be used over the root zone of desirable plants without injury.~~

[9/12/98 Notification: Move to consolidate with common text. Deleted redundant text. Corrected 6 hours to previously approved 2 hour claim.] WHEN TO USE.

~~Use anytime weeds and grasses are actively growing. Treated weeds usually show symptoms within 24 hours with complete kill in 1-2 weeks. Larger, more established weeds may take up to 4 weeks for a complete kill. Roundup works best in warm sunny~~

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~~weather with daytime temperatures above 60°F. Reapply if it rains within 6 hours after application or if regrowth occurs.~~

[9/12/98 Notification: Move to consolidate with common text. Deleted redundant text.]

HOW TO APPLY:

- ~~Remove top cap.~~
- ~~Tighten the built-in sprinkler applicator.~~

~~To use as an edger:~~

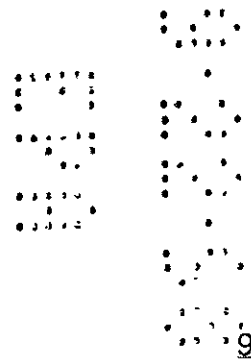
- ~~Turn jug upside down.~~
- ~~Walk slowly holding jug 2 - 6 inches above the ground or weeds.~~
- ~~Apply product to thoroughly cover unwanted vegetation.~~
- ~~One gallon will cover a band 2 inches wide and 1200 feet long.~~

~~To control weeds in larger areas, such as brick or gravel walks and patios:~~

- ~~Turn jug upside down.~~
- ~~Hold jug about waist high to apply.~~
- ~~Adjust the width of the spray pattern to cover weeds by raising or lowering the jug.~~

~~IMPORTANT: Roundup is an all-purpose weed and grass killer which will kill almost all plants contacted. If necessary, use cardboard or plastic to shield desirable plants. If plants are accidentally sprayed, rinse off immediately with water.~~

[End of Edger specific text]



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STORAGE AND DISPOSAL

[For RTU/Nested/Edger Sprayer]

STORAGE: Flip down spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer. Snap sprayer back in place. Store this product in its original container, in a secure area. Protect container from freezing.

[For Fast & Easy Pressure Sprayer/Pull 'N Spray] [6/16/98]

Push T-grip/handle down. To store, make sure handle is all the way down. Slide lock to close. DO NOT DISCONNECT PLUG/WAND FROM T-GRIP/HANDLE. Hook sprayer. Snap wand back in place. Store this product in its original container, in a safe place secure area. Keep Protect container from freezing.

[9/12/98 Notification: Alternate text for Pull 'N Spray] To store, make sure handle is all the way down. Slide lock to close. DO NOT DISCONNECT WAND FROM HANDLE. Snap wand back in place.

[9/12/98 Notification: Text for all sizes] Store this product in its original container, in a secure area. Protect container from freezing.

DISPOSAL: To dispose of partially used or empty container, securely wrap it in several layers of newspaper and discard in trash. In case of SPILL or LEAK, soak up with paper towels and discard in trash. Do not reuse container. [optional text for refill instructions]. Do not reuse empty container except for refill in accordance with refill instructions.

DISPOSAL [Pull 'N Spray]: [6/16/98 Notification]: Do not reuse container (except for refill). Securely wrap partially filled or empty container in newspaper and put in trash.

[24 oz container]

DO NOT REUSE SPRAY BOTTLE EXCEPT FOR REFILL IN ACCORDANCE WITH DIRECTIONS ON THE ROUNDUP® QUIK STIK GRASS & WEED KILLER LABEL. If NOT used for refill, rinse thoroughly before discarding in trash. [Refill language is optional]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

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

[9/12/98 Notification: Move reentry to above] [REENTRY ICON] People and pets may re-enter treated areas after spray has dried.

FIRST AID: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists. In case of an emergency involving this product, call 1-800-454-2333.

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ENVIRONMENTAL HAZARDS

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

NOTICE: BUYER ASSUMES ALL RESPONSIBILITY FOR SAFETY AND USE NOT IN ACCORDANCE WITH DIRECTIONS.

[9/12/98 Notification] Specially formulated for residential use.

This product is protected by U.S. Patent No. 4,405,531. Other patents pending. No license granted under any non-U.S. patent(s).

REFORMULATION OR REPACKAGING FOR SALE IS PROHIBITED

☎ Medical Information call 1-800-454-2333

Product Information call 1-800-225-2883

[9/12/98 Notification: Update contact information]

Questions, Comments or Medical Information

call 1-800-225-2883 www.roundup.com

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SOLARIS®

Manufactured for

The SOLARIS Group of Monsanto Company

P.O. Box 5008

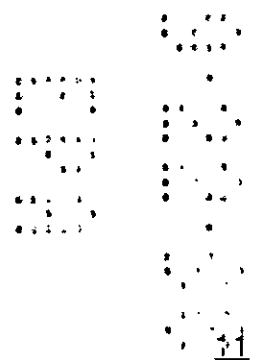
San Ramon CA 94583-0808

EPA Reg. No. 239-2638

EPA Est. 239-IA-3^l, 56100-LA-1^G, 47427-OH-1^M

Superscript is first letter of lot number

Made in USA



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Appendix

[9/12/98 Notification: Add claims to match other Roundup products and consolidate list of claims for easier review.]

[Claims for all packaging options]

- Guaranteed results with one application.
- Ready-to-use, no mixing. Covers xx sq ft [varies with container size]
- Does not have soil activity
- Kills unwanted weeds and grasses, roots and all
- Spray weeds in and around fences, trees, driveways, flower beds, walkways, shrubs, and for lawn renovation. [This "lawn renovation" phrase not for 24 oz container size.]
- New! Larger Size.
- Kills the root. Kills the root so weeds don't come back.
- Kills weeds and grasses, roots and all.
- See results in 24 hours.
- Ornamentals and Flower Beds.
- Easy-to-use Applicator.
- Spot treatment for lawn replanting.
- All Purpose Weed & Grass Killer.
- No leaks or mess. Easy to store (see back for instructions)
- Starts working overnight. Starts to kill overnight. Works overnight.
- Starts working in hours. See results in hours. Starts to kill in the same day.
- Begins working in hours. Starts to kill in hours. Works in hours
- Kills weeds dead ... breaks down into natural materials.
- Rainproof in two hours for control that won't (doesn't) wash away.
- New/Now rainproof.
- New/Now improved.
- Now approved for use in vegetable gardens.
- Ideal for vegetable garden weed control.
- Water Based.
- Kills weeds and grasses, roots and all on contact.
- Multipurpose Grass & Broadleaf Weed Control
- Completely kills even the toughest weeds and grasses.
- Use to prepare sites for large plantings, for planting flower beds, fruit trees, ornamentals, vegetables, garden sites and renovating lawns
- Kills / spray weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, walkways.
- For general weed control - kills weeds and grasses in 2 to 4 weeks - roots & all
- Can Reseed or Sod Lawns 7 Days After Treatment [For lawn renovation and large area treatments]
- Lawns and gardens can be reseeded or planted soon after treatment (day after treatment) [spot treatment and small areas]
- Ornamental gardens can be reseeded or planted 1 day after treatment

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Roundup® L & G READY-TO-USE Fast Acting Formula Grass & Weed Killer
EPA Reg. No. 239-2638

Satisfaction guaranteed or your money back with proof of purchase

Apply Roundup, Rainfast starts working immediately.

Visible Results In 2 to 4 Days

Guaranteed same effective results even if it rains within hours

New formulation enters the plant within one to two hours, won't wash off

Quick uptake, eliminates weather concerns.

Rainfast in hours - enters the plant on contact

New and Improved Formulation -Now Rainfast - Fast Uptake

Works first time, every time, Kills the weed you see and the root you don't

Approved for most/ many lawn and garden uses. Can be used around small fruits and vegetables

Roundup for the patio and driveway.

Kills weeds (and grasses) in patios, driveways, sidewalks and other non-lawn areas.

Kills weeds and grasses down to the root.

Rainproof in two (2) hours.

Rainproof in hours.

Rainfast in 2 hours for control that doesn't wash away (won't wash away).

Does not have soil activity. Controls existing weeds, is not a preemergent

Kills unwanted weeds and grasses, roots and all, kills to the root, kills weeds roots and all.

Refillable

Now! Larger/Bigger Size

Now 33% Larger than 1 Gallon Size.

Quick Kill, Total Kill, No Odor.

Use in and around fences, trees, driveways, ornamentals, patios, walkways, and shrubs.

Use over the root zones of trees, shrubs or desirable plants

Kills the root so weeds don't come back

Ready-to-use, no mixing.

No Measuring.

Use along fences, driveways, walkways, around shrubs, trees, around ornamentals.

[6/16/98 Notification]: No Root, No Weed, No Problem

[7/17/98 Non-notification] 25% More Free, Now Bigger Size

[24 oz container size.]

This 24 oz bottle can be REFILLED with one tablet of Roundup Quik Stik Grass & Weed Killer. See Storage and Disposal section for more information.

[Quick Connect Sprayer]

New quick click sprayer

New quick connect sprayer, Quick & easy to use

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3-ft extension cord/tubing enclosed [in sprayer].

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[Pull 'N Spray Applicator]

[9/12/98 Notification]

NEW! Pull 'N Spray

NO HAND FATIGUE

Continuous, Adjustable Spray

No pumping, just pull

Roundup Ready-To-Use Weed & Grass Killer / Roundup Ready-To-Use in the Pull 'N Spray delivery system is the faster and easier way to kill weeds in your yard and garden. It gives all the advantages of a trigger spray bottle without tiring your hand.

[6/16/98 Notification]

No More Tired/Achy Hands from/caused by Trigger Sprayers

No More Hand Fatigue/Cramping from/caused by Trigger Sprayers

Fast and/& easy application, Quickly covers large areas.

The Ergonomic Sprayer.

New/Now Refillable/Reusable Container/Tank Sprayer.

Easy to use Tank Sprayer, Adjustable Sprayer.

No pumping, Just Pull

NEW/NOW Fast &/and Easy Pressure/Tank Sprayer [illustrations].

NEW/NOW PULL 'N SPRAY

EASY TO ASSEMBLE (AND/& USE)

[9/12/98 Notification: Moved Fence & Yard Edger Specific Claims]

Easy to Use Applicator, Convenient Applicator, The Container is the Applicator., Covers 1200 Linear Feet.

Built - in applicator.

Roundup Fence & Yard Edger has a built-in applicator that makes it easy to use for trimming and edging along driveways and walkways, or around fences, trees, flower beds, shrubs and other areas in your yard.

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[9/12/98 Notification Optional text that may be used when this product is packaged together with Weed-B-Gone Weed Killer, EPA Reg No: 239-2499]

It takes two (2.)

For a beautiful weed free lawn and garden.

Use Weed-B-Gon and Roundup for a weed-free lawn and garden all season.

Weed-B-Gon kills lawn weeds, not the lawn.

Weed-B-Gon kills weeds, not the lawn.

Weed-B-Gon kills weeds not lawns.

ORTHO® WEED-B-GON® for the lawn.

For a beautiful Weed-Free Lawn & Garden

Use Roundup and Weed-B-Gon to control weeds everywhere around (or in) your lawn and garden.

Kills broadleaf weeds in your lawn.

Won't harm most lawn grasses.

Ideal for spot treating individual lawn weeds.

FREE WEED-B-GON

FREE SAMPLE!

Try ORTHO® WEED-B-GON® and treat up to 50 weeds for free.

FREE ORTHO® WEED-B-GON SAMPLE Inside

ORTHO® WEED-B-GON Inside

Try Weed-B-Gon Free.

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MONSANTO

Food • Health • Hope



September 12, 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 Tompkins, PM 25
OPP Mailroom (750C)
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Tompkins:

The Lawn and Garden Division of Monsanto is submitting a notification (OPP 265270) for Roundup® L & G READY-TO-USE Fast Acting Formula Grass & Weed Killer, EPA Reg. No. 239-2638 to add additional label claims, edit the Use Directions for Pull 'N Spray applicator, correct typographical errors, delete American Zoological endorsement, update contact information, and reformat text for easier review.

To assist in identifying the changes, edits are indicated by a line in the left margin and are marked with the date of this notification [9/12/98 Notification]. New text is underlined. Deleted text is crossed out. Additionally, the first copy of the label has the edits highlighted in yellow.

Please call me at 925-355-3336 or contact Dr. Russell Schneider at 202-383-2866 if you have any questions.

Sincerely,

Grace D. Bourke
Registration Specialist

