



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

Desiree L. Little  
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AGRI RESEARCH DIV - U.S. REGULATORY AFFA  
P.O. Box 400  
Princeton, NJ 08543

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

SUBJECT: Label Amendment Submission of 09/02/93 in Response to PR Notice 93-7  
EPA Reg. No. 241-319  
IMAGE 70 DG

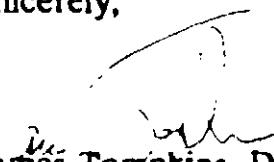
Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE PRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1) of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stamped-accepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.

Sincerely,

  
James Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)



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September 2, 1993

U.S. EPA: Worker Protection Standard  
c/o NCI Information Systems  
8260 Greensboro Drive, Suite 400  
McLean, VA 22102

Re: Worker Protection Standard  
IMAGE® 70 DG herbicide; EPA Reg. No. 241-319  
(OPP Id. No.195282)

Dear Sir or Madam:

In order to comply with PR Notices 93-7 and 93-11, American Cyanamid Company is submitting revised labeling for IMAGE 70 DG herbicide (EPA Reg. No. 241-319); the revised labeling brings this product out of scope of the Worker Protection Standard.

Enclosed please find two (2) copies of the proposed label with the pre-approved exclusionary statement highlighted in yellow marker. In addition, please also find three (3) copies of the proposed label which are not highlighted and one (1) copy of the most recent stamped-approved label; note that deletion of statements from the approved label was not necessary to bring the product out of scope. Also enclosed are a completed EPA Form 8570-1 and the Certification Statement When Deviations Are Proposed.

Should you have any questions or comments concerning this submission, I may be reached at Extension 2378.

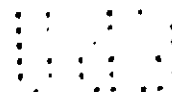
Thank you for your assistance in this matter.

Respectfully submitted,

Desiree L. Little  
Product Registrations Manager  
U.S. Plant Regulatory Affairs

DLL:dt

® Registered Trademark of American Cyanamid Company



### **Certification Statement When Deviations Are Proposed**

I certify that the revised labeling being submitted for this product is in complete accordance with the labeling requirements of PR Notice 93-7, which reflects the requirements of EPA's labeling regulations for worker protection statements (40 CFR part 156, subpart K), except where noted. I have, in one or more places in the revised labeling, proposed changes that deviate from the exact language or location specified in the PR Notice. I have identified all such statements by highlighting them in a way that distinguishes them from any other label revisions. I have attached an explanation for each proposed deviation. I have proposed no changes to this labeling other than those required to comply with 40 CFR part 156, subpart K. I understand that EPA cannot guarantee to render its decision on revised labeling not in complete conformance with PR Notice 93-7 by April 21, 1994. I understand that it would be a violation of FIFRA if I or my supplemental registrants were to sell or distribute this product after April 21, 1994, without amended labeling complying with the requirements of 40 CFR part 156, subpart K.

000

IMAGE® 70 DG herbicide

A Selective Herbicide for Use in Established:

Bermudagrass            St. Augustinegrass  
Centipede grass        Zoysiagrass

ACTIVE INGREDIENT:

Imazaquin (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-quinolinecarboxylic acid).....70.0%

INERT INGREDIENTS.....30.0%

TOTAL.....100.0%

EPA Reg. No. 241-319

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

CAUTION!

PRECAUCION!

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada amplimente.

See next page for additional Precautionary Statements.

In case of emergency endangering life or property involving this product, call collect, day or night, Area Code 201-835-3100.

Net Contents:

AMERICAN CYANAMID COMPANY  
AGRICULTURAL RESEARCH DIVISION  
VEGETATION AND PEST CONTROL  
WAYNE, NJ 07470 ©1993

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

FEB 16 1994  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
is amended, for the pesticide  
registered under EPA Reg. No.  
241-319

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#### STATEMENT OF PRACTICAL TREATMENT

If on skin: Wash with plenty of soap and water.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS

##### CAUTION!

Causes eye irritation. Avoid contact with skin, eyes or clothing. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling.

##### ENVIRONMENTAL HAZARDS

DO NOT apply directly to water or wetlands (swamps, bogs, marshes and potholes). DO NOT contaminate water by cleaning of equipment or disposal of wastes.

##### DIRECTIONS FOR USE

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

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Observe all cautions and limitations on this label. The use of IMAGE not consistent with this label may result in injury to crops. Keep container closed to avoid spills and contamination.

Do not apply this product through any type of irrigation system.

##### STORAGE AND DISPOSAL

**PROHIBITIONS:** DO NOT contaminate water, food, or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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#### DISCLAIMER

The label instructions for the use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the use or application of the product contrary to label instructions, all of which are beyond control of American Cyanamid Company. All such risks shall be assumed by the user.

American Cyanamid Company warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the directions for use, subject to the risks referred to above.

Any damages arising from breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values or any other special or indirect damages.

American Cyanamid Company makes no other express or implied warranty, including other express or implied warranty of FITNESS or of MERCHANTABILITY.

#### GENERAL INFORMATION

IMAGE is a unique, versatile herbicide that will control or aid in the control of several important weeds in warm-season turfgrasses. IMAGE may be used at weed control rates of application on established bermudagrasses, centipedegrasses, St. Augustinegrasses and zoysiagrasses. IMAGE will effectively control susceptible weeds when applied to the foliage of actively growing weeds (postemergence treatment).

IMAGE-treated turfgrasses may have a compacted growth habit and formation of seed heads may be inhibited; vigor is not impaired.

#### HERBICIDE COMBINATIONS

IMAGE may be tank-mixed with registered preemergence and broadleaf postemergence herbicides and with methylarsonate herbicides, such as MSMA, to control weeds not controlled by IMAGE alone. DO NOT tank-mix IMAGE with other postemergence herbicides labeled for grass weed control in turf. IMAGE may be applied prior to or sequential to the use of all currently labeled preemergence and postemergence herbicides.

When IMAGE is used in tank-mixture with another herbicide refer to each label for rates, methods of application, proper timing, weeds controlled, limitations and precautions. ALWAYS USE in accordance with the more restrictive label limitations and precautions. IMAGE cannot be mixed with any product containing a label prohibition against such mixing.

### MIXING INSTRUCTIONS

Fill the spray tank one-half to three-quarters full with clean water. While agitating add the required amount of IMAGE and then fill the remainder of the tank with water. Maintain agitation while spraying to ensure a uniform spray mixture.

When tank-mixing IMAGE with recommended herbicides, add the other herbicide to the spray tank first and make sure it is thoroughly mixed before adding IMAGE.

### ADDITION OF SURFACTANTS

For postemergence application of IMAGE, the addition of a nonionic surfactant, such as LESCO Spreader Sticker at 0.25% v/v (2 pints per 100 gallons of spray mixture) of the spray volume is required. Add the nonionic surfactant to the spray mixture after herbicide(s) have mixed. An antifoaming agent may be added to the tank, if needed.

### SPRAYING INSTRUCTIONS

Uniformly apply IMAGE sprays with a properly calibrated sprayer in sufficient volume to insure adequate coverage (40-200 gallons/acre). AVOID drift onto vegetables, flowers, ornamental shrubs and other desirable plants or injury may result. AVOID overlaps when spraying. Add a spray indicator dye such as LESCO TRACKER to prevent overlaps. DO NOT apply when wind velocity is greater than 10 mph.

### SPECIAL PRECAUTIONS

USE ONLY on well established non-stressed turfgrass with a dense and uniform stand. TEMPORARY YELLOWING may occur.

DO NOT use on golf or bowling greens.

DO NOT use on unlabeled turfgrass species, including dichondra.

DO NOT mow St. Augustinegrasses until 48 hours after application.

DO NOT use on tall fescue or mixed stands of tall fescue and bermudagrass.

DO NOT reseed or winter overseed or sprig turfgrass for 1-1/2 months after treatment.

DO NOT apply to newly planted or sprigged lawns.

DO NOT use on winter overseeded turfgrass. IMAGE may injure ryegrass, bentgrass or Poa trivialis.

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DO NOT use on ornamentals as injury may result.

DO NOT graze or feed clippings of treated turfgrasses.

DO NOT apply aerially.

#### IMAGE USE RATES AND WEEDS CONTROLLED

Rates: Use 0.13 to 0.26 ounces per 1000 square feet of turf. One pound treats 1.4 to 2.8 acres. The high rate should be used where heavy weed infestations occur. IMAGE is effective when applied at anytime during the year except at turfgrass transition from winter dormancy.

#### MONOCOT WEEDS

FLATSEGE, RICE	( <u>Cyperus iria</u> )
GARLIC, WILD	( <u>Allium vineale</u> )
ONION, WILD	( <u>Allium canadense</u> )
STARBUR, BRISTLY	( <u>Acanthospermum hispidum</u> )
NUTSEGE, PURPLE	( <u>Cyperus rotundus</u> )
NUTSEGE, YELLOW*	( <u>Cyperus esculentus</u> )
SANDBUP, FIELD	( <u>Cenchrus incertus</u> )

#### DICOT WEEDS

CHICKWEED, COMMON	( <u>Stellaria media</u> )
CHICKWEED, MOUSEEAR	( <u>Cerastium vulgatum</u> )
HENBIT	( <u>Lamium amplexicaule</u> )
PARSLEY-PIERT	( <u>Alchemilla arvensis</u> )
PIGWEEED SPECIES	( <u>Amaranthus spp.</u> )

\* Use the high rate of application and/or tank-mixes with a methylarsonate herbicide such as MSMA.

NOTE: A repeat application may be required for season-long control.

Addition of a methylarsonate herbicide, such as MSMA, at labeled rates will result in more rapid and improved sedge control in methylarsonate tolerant turfgrasses.

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