

Reg # 478-44

PM-23

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JAN 29 1991

R. Claire Bousquet  
 Division of United Industries Corp.  
 P.O. Box 15842  
 St. Louis, MO 63114

**BEST AVAILABLE COPY**

Dear Ms. Bousquet:

Subject: Revised Formulation  
 Your Submission Dated August 8, 1990  
 Label Amendment, addition of "Water Based"  
 Your Submission Dated September 10, 1990  
 Real-Kill Spot Weed Killer

The amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), are acceptable provided that you, on the label, correct the following:

1. The chemical name of active ingredient #3 so it is consistent with the other 2 active ingredients (i.e., dimethylamine salt should be written before the chemical name as follows: "Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid")

2. The ortho sign in active ingredient #2 should be written in the lower case (i.e., change "O" to "o").

3. It is required that the analysis of 2,4-D be performed according to the AOAC Method No.6 D01-5 (or its latest version) and should be stated as such as a footnote to the ingredient label statement. The footnote should read "Isomer specific by AOAC Method No. 6 D01-5" (or whatever version is being used in your analysis) and should be referenced to the 2,4-D active ingredient.

CONCURRENCES

SYMBOL	H7505C						
SURNAME	Robbins						
DATE	1/29/91						

[2]

4. It is preferred to separate with a colon the common name, "Dicamba" from its chemical name (i.e., "Dimethylamine salt of Dicamba: 3,6-dichloro-o-anisic acid").

A stamped copy of the label is enclosed for your records. Please submit three (3) copies of your final printed labeling incorporating the above changes.

Sincerely yours,

Joanne I. Miller  
Acting Product Manager(23)  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

Enclosure

**BEST AVAILABLE COPY**

CONCURRENCES

SYMBOL	H7505C							
SURNAME	Robbins							
DATE	1/29/91							

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**PRECAUTIONARY STATEMENTS**

**CAUTION: Hazards to Humans and Domestic Animals**  
Harmful if swallowed or absorbed through skin. Avoid breathing vapor and spray mist. Avoid contact with skin, eyes and clothing. Avoid contamination of food or feedstuffs. When handling this product, wear chemical resistant gloves, long pants, long-sleeved shirt and shoes. Wear goggles when applying this product. Wash hands before eating or smoking and after each use. Do not reenter or permit others to reenter treated areas until sprays have dried or dusts have settled.

**Statement of Practical Treatment**

**If Swallowed:** Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Never induce vomiting or give anything by mouth to an unconscious person. **If on Skin:** Wash contaminated clothing and wash affected areas with plenty of soap and water. **If In Eyes:** Flush eyes with plenty of water. Call a physician if irritation persists. **If Inhaled:** Remove victim to fresh air. Apply artificial respiration if indicated.

**Environmental Hazards** • Do not apply under conditions involving possible spray contact or drift onto food, forage, vegetables, ornamental plants or other desirable plantings that might be damaged or the crops rendered unfit for sale, use or consumption. This product is toxic to fish and aquatic invertebrates. Drift or runoff may adversely affect fish, aquatic invertebrates and nontarget plants. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Drift and runoff from treated sites may be hazardous to fish and aquatic organisms in adjacent waters. Do not contaminate water when disposing of equipment washwaters.

**Physical and Chemical Hazards** • Do not use or store near heat or open flame.

**Storage and Disposal** • **Storage:** Store in a cool, dry place away from heat, direct sunlight, or open flame. Keep from freezing. Keep in original container and preferably in a locked storage area. Keep separate from other pesticides, fertilizers, seeds, food or feed during storage to prevent cross-contamination. **Disposal:** Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

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

**Beal-Kill**

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

*Jan. 29, 1991*

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

**SPOT WEED  
KILLER**

*478-44*

**For Home and Lawn Care  
No Mixing... Just aim and spray  
For treating Broadleaf weeds in lawns**

**KILLS: Dandelions, Plantains, Chickweeds,  
Poison Ivy, Wild Onion, Oxalis and many  
other broadleaf weeds  
Water-Based**

**Active Ingredients:**

* Dimethylamine salt of 2,4-Dichlorophenoxyacetic acid .....	0.260%
** Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid) .....	0.025%
*** 2-(2-methyl-4-chlorophenoxy) propionic acid, dimethylamine salt .....	0.261%
Inert Ingredients .....	99.454%
Total .....	100.000%
* 2,4-Dichlorophenoxyacetic acid equivalent, 0.216%; ** 3,6-dichloro-o-anisic acid equivalent, 0.021%; *** 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent, 0.216%	

*1/24/91  
Talked to Carl  
Grable and he had  
no objection to  
the addition  
of water based.  
AR*

**Keep Out of Reach of Children  
CAUTION**

**See Back Panel for Additional  
Precautionary Statements**

**Net Contents: 40 fl. oz. (1 qt. 8 oz.)**

**Other Precautions**

Do not allow spray to drift onto ornamental plants, shrubs, plants since injury may result near these plants. Avoid fine droplets are less likely to wind non-target plants. Do not spray and shrubs. Do not exceed particularly careful within ornamental species. This spraying individual weeds Bent grass, St. Augustine, clover lawns are sensitive to temporarily injured.

**Directions for Use**

It is a violation of Federal law in a manner inconsistent with its label cautions, warnings and with Federal and State regulations.

Turn adjustable nozzle by 90 degrees. A jet stream is less likely to kill most broadleaf weeds within 24 hours. If certain weeds sprayed may flourish for a force the weeds to grow so

**NOTICE:** Seller warrants that chemical description and label stated on the label when used in directions under normal conditions warranty nor any other warranty implied, extends to the use label instructions, or under conditions not reasonably foreseeable. Seller assumes the risk of any such use. Manufactured in the U.S.A. for Form: DC1990 EPA Reg. 478-44 EPA