UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Steven E. Rogosheske Value Garden Supply P.O. Box 585 St. Joseph, MO 64502

AFR 17 2007

Dear Mr. Rogosheske:

SUBJECT:

Label Amendment and Revised Confidential Statement of Formula (CSF)

Dated January 9, 2007

St. Augustine Grass Broadleaf Herbicide

EPA Registration No. 769-681

Your Application Dated January 11, 2007 to Convert the Racemic

Form of MCPP to the Active R Isomer MCCP-p

The Agency has completed its review of the above named CSF and has found it acceptable. This CSF supersedes the previously accepted one.

The label amendment referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1. Under the "First Aid" statement, add a "period" after the end of each sentence.
- 2. Under the "Precautionary Statements":
 - a. Replace the word "lauder" with "launder".
- b. Move the following statement under the "Directions for Use" section of the labeling: "The maximum number of broadcast applications per treatment site is 2 per year "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried."
- 3. Under the "Environmental Hazards" section:
 - a. Correct the spelling of the word "Environmental" in the heading.
- b. Revise the statement to read: "This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate. This chemical has properties and characteristics associated with chemicals detected in

7505P Heljan 417/07 groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater."

- 4. Under the "Directions for Use" section:
- a. Add the following statements: "Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application." Do not allow people or pets to enter the treated areas until sprays have dried."
 - b. Under the "Where to Use" statement, in the last sentence, correct the spelling of "second" (not "cecond").
- c. Under the When to Apply" statement, correct the spelling of "Henbit" (not "Hembit").
- 5. Under the "Storage & Disposal" statement, correct the spelling of the telephone number of "1-800-CLEANUP (not "CEANUP").

A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment. This amended labeling supersedes all previously accepted ones.

Sincerely yours,

Joanne I. Miller Product Manager (23) Herbicide Branch Registration Division (7505C)

Enclosure

ST. AUGUSTINE GRASS BROADLEAF HERBICIDE

Editor's Note: Text in [brackets] are optional marketing statements any or all of which may appear on final printed label.

[For use on residential lawns, playgrounds, sports fields, and other turf areas]

[Concentrate]

[Kills Dandelions, Chickweed, Knotweed, Plantains, Henbit, Spurge, Clover, and Poison Ivy]

[Controls over 36 weed species - roots and all]

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	3.04%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)	
Propionic acid	5.29%
Dimethylamine salt of Dicamba (3,6-dichloro-o-anisic acid)	. 1.29%
OTHER INGREDIENTS	. <u>90.38%</u>
TOTAL:	100.00%

This Product Contains:

0.23 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 2.52%
0.39 lbs (+)-(R)-2-(2-methyl-4-chlorophrnoxy) propionic acid equivalent per gallon or 4.37%
0.098 lbs 3,6-dichloro-o-anisic acid equivalent per gallon or 1.07%
Isomer Specific by AOAC Methods
Contains the single isomer form of Mecoprop-p

ACCEPTED with COMMENTS In EPA Letter Dated:

APR 1 7 2007 Under the Federal Insecticide, Fungicide, and Rodenticide Acr as amended, for the pesticide registered under EPA Reg. No

769-681

KEEP OUT OF REACH OF CHILDREN

CAUTION

poison control center or doctor immediately for treatment advice e person sip a glass of water if able to swallow not induce vomiting unless told to do so by the poison control center or doctor, not give anything by mouth to and unconscious person e person to fresh air. Irson is not breathing, call 911 or an ambulance, then give artificial respiration, erably by mouth-to-mouth, if possible. poison control center or doctor immediately for further treatment advice
e person to fresh air. rson is not breathing, call 911 or an ambulance, then give artificial respiration, erably by mouth-to-mouth, if possible.
poison control center of doctor infinediately for further treatment advice
e off contaminated clothing. e skin immediately with plenty of water for 15-20 minutes. a poison control center or doctor for treatment advice.
eye open and rinse slowly and gently with water for 15-20 minutes. ove contact lenses, if present, after 5 minutes, then continue rinsing eye. a poison control center or doctor for treatment advice.

EPA Reg. No. 769-681

EPA Est. No.

Manufactured by Value Garden Supply, St. Joseph, MO 64502

Net Contents:

PRECAUTIONARY STATEMENT HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt, long pants, socks, goggles, shoes and chemical resistant gloves when using or applying this product. After using the product, wash non-disposable gloves thoroughly with soap and water before removing. Remove clothing and lauder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. The maximum number of broadcast applications per treatment site is 2 per year. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried. Avoid contamination of food or feedstuffs. Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with pesticides.

ENVIRONMENTAL HAZARD

This product is toxic to aquatic invertebrates. Drift or run-off may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters, or pour the washwaters on the ground. Do not apply to areas underlaid by roots of desirable trees and shrubs. Do not apply this product through any type of irrigation system.

DIRECTIONS FOR USE

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

USE PRECAUTIONS: Do not apply this product through any type of irrigation system. Do not allow spray or drift to contact vegetables, flowers, ornamental plants, shrubs, trees or other desirable plants as injury may result. Do not pour spray solution near these plants. Do not apply to Carpetgrass, dichondra, or desirable Clovers as injury may occur. Using a tank-type sprayer and following recommended rates to kill undesirable weeds. Do not apply to areas underlaid by roots of desirable trees and shrubs. Do not exceed recommended rates as injury to turf may occur. Avoid spraying St. Augustinegrass when temperature is above 90° F and under conditions of high humidity.

ST. AUGUSTINE GRASS BROADLEAF HERBICIDE [This product] is especially effective against weeds such as Sheep Sorrel, Knot Weed, Spotted Spurge, Chickweed, Oxalis, and Henbit. In addition to these, it kills most broadleaf weeds, some of which are listed below.

Bedstraw Heal-all Ragweed Black Medic Henbit Sheep Sorrel Buckhorn Knotweed Sheperdspurse Bull Thistle Lamsquarter Speedwell Burdock Lespedeza Tansy Mustard Buttercup Mallow Thistle Chicory Morning Glory Spurge Chickweed Mustard Velvet Leaf Clover Wild Carrot Oxalis Cocklebur Wild Garlic Peppergrass Dandelion Pigweed Wild Onion Wild Lettuce Dock Plantain Galinsoga Poison Ivy Yarrow Ground Ivy Poison Oak and many other Hawkweed Purslane broadleaf weeds

HOW TO MIX:

For use on St. Augustine grass, bentgrass, buffalo grass and grass seedlings: Mix 1 ounce in 1 gallon of water (30 ml in 3.8 liters) and uniformly spray 400 sq. feet (36.0 sq. meters). For example, an area 10 feet

wide by 40 feet long (3.0 m by 12.0 m). If necessary, repeat treatment in 2 to 3 weeks, if hard-to-kill weeds persist.

For use on certain other grasses such as Bermuda, bahia, bluegrass, centipede, fescue and rye: Mix 1 ½ ounces in 1 gallon of water (45 ml in 3.8 liters) and spray uniformly over 400 sq. feet (36.0 sq. m.). On hard-to-kill species, or under poor growing conditions or on older weeds, mix 2 ounces in 1 gallon of water (60 ml in 3.8 liters) and spray onto 400 sq. feet (36.0 sq. m.) with special attention to thorough coverage of the hard-to-kill weeds.

GENERAL INFORMATION [HOW TO USE]: ST. AUGUSTINE GRASS BROADLEAF HERBICIDE is specially formulated for maximum safety to seedling grasses and 2,4-D sensitive grasses such as St. Augustine grass, benttgrass and buffalo grass. Sprays should be applied when broadleaf weeds are small and tender for best results. If weeds are older and hard-to-kill, the higher rates recommended should be used. Avoid spraying St. Augustine grass under conditions of high temperature and moisture when the St. Augustine grass is growing rapidly. Under these conditions, or in cases of accidental overdose, some slight temporary discoloration or in cases of accidental overdose, some slight temporary discoloration of the St. Augustine grass foliage might occur.

To insure weeds are growing and able to absorb the herbicide, urrigate the lawn 2 or 3 times prior to spraying. Do not water for 24 hours after treatment. Although spray works faster with temperatures above 70 degrees F° (21degrees C°) sprays can be applied at any time plants are growing. Spray when air is calm to avoid drift. Spray will injure or kill clover, dichondra and most ornamental and vegetable crops. Use only lawn sprayers for this product. Use a coarse spray which is less likely to drift.

Amount of water in spray is not important, except to evenly distribute the chemical. If directions call for 1 ounce in 1 gallon to 400 sq. feet (30 ml in 3.8 liters on 36.0 sq. meters) it may be more convenient to use 1 ounce in 2 gallons of water on 400 sq. feet (30 ml in 7.6 liters on 36.0 sq. meters) depending on the sprayer. Generally a large volume of water results in more uniform coverage.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry area away from heat or open flame. Keep in original container and preferably in a locked storage area inaccessible to children and pets. Do not store below 32° F. DISPOSAL: If Empty: Do not reuse empty container. Place in trash or offer for recycling if available. If Partly Filled: Call your local solid waste agency or 1-800-CEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Seller's guaranty shall be limited to the terms of the label and subject thereto. To the extent consistent with applicable law, the buyer assumes and risk of damage or property arising out of use of handling and accepts the product on these conditions.

[For product information call 952-884-6477] [www.valuegardens.com]

1/09/07