UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 17 2007

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

SUBJECT: Label Amendment and Revised Confidential Statement of Formula (CSF)

Dated January 9, 2007

Pratt Chickweed and Clover Killer EPA Registration No. 769-859

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 to 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 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."

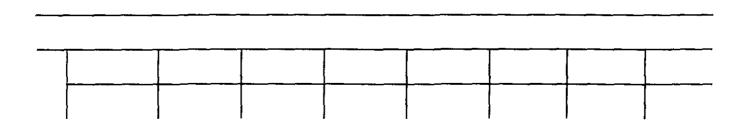
- 4. Under the "Directions for Use" section:
- a. Add the following statements: "Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application." Do not allow people or pets to enter the treated areas until 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



Pratt Chickweed & Clover Killer

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

[Kills Dandelions, Henbit, Spurge, Clover, and Poison Ivy, and Many Other Broadleaf Weeds]

[Treats 4,000 sq. ft.] - for pint container size

[Treats 8,000 sq. ft.] - for quart container size

[Kills more than 33 weed species - roots and all]

ACCEPTED with COMMENTS In EPA Letter Dated:

ACTIVE INGREDIENTS:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)

OTHER INGREDIENTS......89.70%

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

769-859

This product contains:

0.60 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 6.30%

0.144 lbs. (+)(R)-2-(2-methyl-4-chlorophrnoxy) propionic acid equivalent per gallon or 1.52%

0.065 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.69%

Isomer Specific by AOAC Methods

Contains the single isomer from Mecoprop-p

KEEP OUT OF REACH OF CHILDREN

CAUTION

	FIRST AID	
If swallowed:	 Call poison control center or doctor immediately for treatment advice Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to and unconscious person 	
If inhaled:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call poison control center or doctor immediately for further treatment advice 	
If on skin or clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 	
If in eyes:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. 	
treatment. For in	container or label with you when calling a poison control center or doctor, or going for formation on this product (including health concerns or medical emergencies call the e Information Center at 1-800-858-7378.	

EPA Reg. No. 769-859

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. Spray or drain over a large area away from wells, other water sources and desirable plants. 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. This product is for use on home lawns and home recreational turf areas only. Do not apply this prouct to sites or areas not listed or prohibited on this label.

USE PRECAUTIONS: DO NOT allow spray or drift to contact vegetables, flowers, ornamental plants, shrubs, trees or other desirable plants. DO NOT pour spray solution near these plants. NO NOT broadcast apply to Centipede, St. Augustine, Carpetgrass, dichondra, desirable Bentgrass or Clover as injury may occur. Using a tank-type sprayer and following recommended rates, "Spot Treatments" can be made in such sensitive lawn types 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.

CONTROLS: Buckhorn, Burdock, Carpet Weed, Chicory, Chickweed, Clover, Cocklebur, Dandelion, Dock, Dog Fennel, Frenchweed, Galin Sage, Hawkweed, Henbit, Jimson Weed, Knot Weed, Lambsquarter, Lippia, Mallow Morning Glory, Mustard, Oxalis, Pennywort, Peppergrass, Pigweed, Plantain, Poison Ivy, Poison Oak, Purslane, Ragweed, Sheep Sorrel, Shepherdspurse, Smartweed, Speedwell, Spurge, Thistle, Wild Carrot, Wild Garlic, Wild Lettuce, Wild Onion, Wild Radish, Yarrow and Most Other Broadleaf Weeds

WHERE TO USE: This product [product name] may be used to effectively kill weeds in Bluegrass, Bermuda or Zoysia home turf areas. After applying this product, many broadleaf weeds will begin to show visible signs of leaf curl within a few days. Some hard-to-kill broadleaf weeds may require a cecond treatment in 3-4 weeks.

WHEN TO APPLY: Apply anytime during the growing season when weeds are actively growing. Treat Chickweed, Hembit, Wild Onion and Wild Garlic in the Fall or in the Spring, as needed. For new lawns wait until the turf has reached a height of 2 inches and turf has been mowed 3 times. Do not re-seed or plant stolons for 3-4 weeks following application of this product. Poor weed control may result if treatment is made during drought or just prior to rainfall. For best results, mow lawn a few days before treating. Do not water lawn within 48 hours after treatment. Do not mow lawn with 48 hours after application. The maximum number of broadcast application per treatment site is 2 per year.

HOW MUCH TO USE (ENTIRE LAWN) HOSE-END SPRAYER

Use a hose-end sprayer designed for lawns. Put recommended amount of product (Column 1) in bottle and add water to indicated level (Column 2) and spray on area shown in Column 3. For example to spray 2,500 sq. ft., measure 10 oz. (20 tbsp) in jar and add water to the 10 gallon level and mix. Turn on hose and spray as evenly as possible over 2,500 sq. ft.

Amoun	tof this product ct name] to use Fluid Ounces	Column 2 Fill bottle to: (Gallons)	Column 3 Area to Treat (Square Feet)
10	5	5	1,250
20	10	10	2,500
30	15	15	3,750
40	20	20	5,000

[HOW TO USE] PRESSURE SPRAYERS: Measure the amount of this product into tank and dilute with water according to the following char. Use a spray pattern that gives small spray droplets without any fine mist, and cover area indicated.

Column 1 Amount of this product [product name] to use		Column 2	Column 3 Area to be Sprayed (Square Feet)
		Amount of Water in sprayer (Gallons)	
Tbsp.	Fluid Ounces	•	` '
6	3	1	750
32	16	16	4,000
64	32	32	8,000

SPOT SPRAYING: To spray small areas or individual weeds do not use a hose-end sprayer. Mix 1 oz. (2 tbsp) in a half-gallon of water in a pressure sprayer and spray as required, being certain to "wet" each weed.

STORAGE & DISPOSAL

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

STORAGE: Store in a cool, dry area away from fertilizers, seed, insecticides, or fungicides. 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.

1/09/07