

802-508

04/26/2004

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

APR 26 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Molly Hickman
Lilly Miller Brands
P.O. Box 2289
Clackamas, OR 97015

Dear Ms. Hickman:

Subject: Lilly Miller Moss-Kil, EPA Reg. No. 802-508- Revised Labeling
Resubmission dated March 30, 2004

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable, provided you make the following changes before you release the product for shipment.

- On page 3 (center of the page), change the wording to "Alternate directions for use for a container with hose-end sprayer attached."
- On page 1 and 5, it recommended that the "First Aid" and the "Storage and Disposal" information be placed within a box, so that the text will be set apart from the rest of the label.
- On page 1, for "First Aid" it is recommended to place the exposure route of greatest to least concern and include a hot line number in case of an emergency.
- On page 3 and 4, it is recommended not to restate all of the information for "Direction for Use" and "Preventive Treatment", but express these things by stating "as previously stated".

Submit one (1) copy of your final printed labeling and incorporate the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. If you have any questions, feel free to contact Tracy White at (703) 308-0042. A stamped copy of labeling is enclosed for your records.

Sincerely,

JS/

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

LILLY MILLER®
MOSS-KIL

Economical Concentrate
Covers up to 1,200 sq. ft.
Kills Moss Quickly!
On Roofs, Decks, Patios, Walks, Bricks, and Cement
Non-staining, Non-corrosive to galvanized gutters
For best results use prior to establishment of heavy moss infestations.
After 3 to 5 weeks the dead moss may simply be hosed or swept off the treated area.

ACTIVE INGREDIENT:
Zinc chloride.....62.0%
INERT INGREDIENTS.....38.0%
Metallic zinc equivalent = 29.6%

Keep out of reach of children
DANGER
See back panel for additional precautions.

NET CONTENTS ½ GALLON (1.8 l)

ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 26 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

802-508

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wear goggles. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Do not allow persons or pets in treated areas until sprays have dried.

FIRST AID

IF SWALLOWED: Call a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person. **IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice. **IF ON SKIN:** 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 INHALED:** Remove person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice. Have the product

container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate gastric lavage.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

For best results, apply MOSS-KIL just prior to the time when fall rains begin or in early spring. Moss growth can occur in nearly any location where dampness persists. Such areas include roofs, decks, steps, patios, walks, fence posts, and foundations. Since moisture is essential, most moss growth appears during the fall, some in the winter and in the spring. Very little moss forms in summertime. Destroying existing moss is done most effectively during times when its growth is most rapid and when rain is not expected for several days. Controlling moss may add months, or years, of service to roofs, patios and such areas.

SHAKE WELL BEFORE USING. PLEASE READ ENTIRE LABEL. USE ONLY AS DIRECTED. OBSERVE ALL PRECAUTIONS.

USE PRECAUTIONS: Make certain none of the mixture runs from eaves or splashes on planted area below roofs. Where this possibility exists, cover shrubs, flowers or lawn before making application. Where treating walkways or patios, avoid application to adjacent lawn or plants. Product may damage windows, skylights, and painted or metal surfaces. Keep spray off these surfaces and other surfaces not intended for moss control treatment. Immediately wash off any spray that accidentally contacts these surfaces.

USE ON ROOFS, DECKS, STEPS, PATIOS, WALKS, FENCE POSTS AND OTHER OUTDOOR STRUCTURES MADE OF COMPOSITION SHINGLES, WOOD, GRAVEL, BRICK AND UNPAINTED CEMENT

PREVENTIVE TREATMENT - For preventing moss growth, or for use after sweeping or otherwise removing as much moss as possible.

1. Mix MOSS-KIL at the rate of 1 pint in 3 gallons of water. (Equivalent to 10 2/3 tablespoons in 1 gallon of water.)
2. Apply with sprinkling can, hose-end sprayer, or tank sprayer to thoroughly wet moss, using at least 1 gallon of mixture to 100 sq. ft.

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3. Repeat treatment as necessary (when new moss growth begins to spear.)

FOR DESTRUCTION OF HEAVY MOSS GROWTH - Where it is impractical to first remove moss by sweeping or other means, as indicated under PREVENTIVE TREATMENT.

1. Mix MOSS-KIL at the rate of 1 pint in 3 gallons of water.
2. Apply at the rate of 3 gallons of mixture to 100 sq. ft. of moss area. Make application slowly to thoroughly soak the moss and avoid run-off.
3. On roofs, apply liberally to higher portions of roof moss. This allows rain to move some of the treatment material down through the moss patches.
4. After three to five weeks, depending on thickness of moss growth, the dead moss may be hosed, swept, or raked off the treated area.

PREVENTIVE TREATMENT with MOSS-KIL should be made immediately to the cleaned area with repeat treatments just prior to the time the fall rains begin, or in early spring.

Alternate use directions for container with hose-end sprayer attached:

Sprays up to 20 feet. Do not spray on lawn or plants.

DIRECTIONS FOR USE

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

For best results, apply MOSS-KIL just prior to the time when fall rains begin or in early spring. Moss growth can occur in nearly any location where dampness persists. Such areas include Roofs, Patios, Sidewalks and Foundations. Since moisture is essential, most moss growth appears during the fall, some in the winter and in the spring. Very little moss forms in summertime. Destroying existing moss is done most effectively during times when its growth is most rapid and when rain is not expected for several days. Controlling moss may add months, or years, of service to roofs, patios and such areas.

SHAKE WELL BEFORE USING. PLEASE READ ENTIRE LABEL. USE ONLY AS DIRECTED. OBSERVE ALL PRECAUTIONS.

USE PRECAUTIONS: Make certain none of the mixture runs from eaves or splashes on planted area below roofs. Where this possibility exists, cover shrubs, flowers or lawn before making application. Where treating walkways or patios, avoid application to adjacent lawn or plants. Product may damage windows, skylights, and painted or metal surfaces. Keep spray off these surfaces

and other surfaces not intended for moss control treatment. Immediately wash off any spray that accidentally contacts these surfaces.

USE ON ROOFS, DECKS, STEPS, PATIOS, WALKS, FENCE POSTS AND OTHER OUTDOOR STRUCTURES MADE OF COMPOSITION SHINGLES, WOOD, GRAVEL, BRICK AND UNPAINTED CEMENT

PREVENTIVE TREATMENT - For preventing moss growth, or for use after sweeping or otherwise removing as much moss as possible.

Spray, using low water pressure, until container is empty over 1,200 square feet (120' x 100'). Apply to thoroughly wet moss. Repeat treatment as necessary (when new moss growth begins to spear.)

FOR DESTRUCTION OF HEAVY MOSS GROWTH - Where it is impractical to first remove moss by sweeping or other means, as indicated under PREVENTIVE TREATMENT.

Spray, using low water pressure, until container is empty over 400 square feet (40' x 10'). Make application slowly to thoroughly soak the moss and avoid run-off. On roofs, apply liberally to higher portions of roof moss. This allows rain to move some of the treatment material down through the moss patches.

After three to five weeks, depending on thickness of moss growth, the dead moss may be hosed, swept, or raked off the treated area. PREVENTIVE TREATMENT with MOSS-KIL should be made immediately to the cleaned area with repeat treatments just prior to the time the fall rains begin, or in early spring.

TO USE THIS SPRAYER:

1. Shake container well.
2. Remove the child-resistant closure and save it for resealing the container when you are finished.
3. Insert the dip tube of the hose-end applicator into the bottle and seal the applicator head tightly to the bottle.
4. Connect spray nozzle to garden hose.
5. Turn on the water from the faucet.
6. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)
7. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

TO STOP SPRAYING:

1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig. 3)

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2. Turn off the water from the faucet.
3. Turn the knob to H2O then OFF, to drain the water from the hose. (Fig. 4)
4. Unscrew spray nozzle from hose. Remove hose-end from container.
5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container and keep in a locked storage area out of reach of children and domestic animals. **PRODUCT DISPOSAL: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

LILLY MILLER BRANDS
PO Box 2289
CLACKAMAS, OREGON 97015
EPA Reg. No. 802-508
EPA Est. 48494-CA-01
www.lillymiller.com
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