



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

27 JAN 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Central Garden & Pet dba Lilly Miller Brands
118 1/2 East Main St., Suite 1
Salem, VA 24153

Subject: 2,4-D RED Label Amendment
Lilly/Miller Ready-To-Use Lawn Weed Killer
EPA Reg. No. 802-580

The labeling referred to above is in compliance with the 2,4-D RED and are amended under the RED provided that you:

1. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
2. Make the following changes to the product labeling:
 - a. Per the acute toxicity review, the signal word currently on the label "CAUTION" must be revised to read "DANGER"
 - b. Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label in the following order:

"IF IN EYES:...
IF SWALLOWED:...
IF ON SKIN OR CLOTHING:..."
 - c. As specified in the acute toxicity review, a phone number for emergency medical treatment information should be added to the label.
 - d. Per the acute toxicity review, a Note to Physician must be added to the label and must read:

"Note to Physician
Probable mucosal damage may contraindicate the use of gastric lavage."

Continued on Page 2

The Agency recommends that additional text be added to the Note to Physician that addresses eye irritation concerns. The following statements are suggested types of information that could be included if applicable.

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice

- e. Per the acute toxicity review, the first 3 sentences in the Hazards to Humans and Domestic Animals must be revised to read:

“DANGER

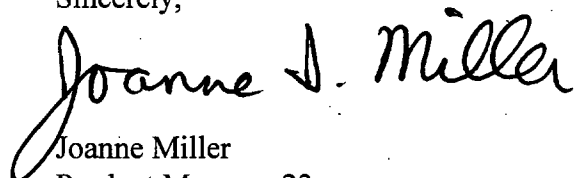
Causes irreversible eye damage. Harmful if swallowed. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear (goggles or faceshield), long-sleeved shirt, long pants, shoes, socks, and chemical-resistant gloves made of any waterproof material.”

- f. Review the first Optional Marketing Statement as it appears to be relaying the message that this product has negative effects on lawn grass as it currently reads: “Kills lawn weeds **with harming** lawn grasses”

Please Note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

A stamped copy of your labeling is enclosed for your records. Submit one (1) copy of the revised final printed label for the record before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions

Sincerely,



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

LILLY MILLER READY-TO-USE LAWN WEED KILLER

Optional Marketing Statements:

- Kills lawn weeds with harming lawn grasses
- Controls more than 200 weeds
- Kills over 200 types of lawn weeds
- Kills dandelion, clover, plantain
- Also kills hard to control weeds such as spurge, oxalis, and Japanese clover
- Begins working overnight
- Contains Trimec® Herbicide

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid	0.593%
Dimethylamine Salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.143%
Dimethylamine Salt of Dicamba (3,6-dichloro-o-anisic acid).....	0.066%
OTHER INGREDIENTS	99.198%
Total	100.000%

This product contains:

- 0.04 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 0.492%
- 0.01 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 0.118%
- 0.005 lbs. 3,6-Dichloro-o-anisic acid equivalent per gallon or 0.05%
- Isomer Specific by AOAC Methods.

ACCEPTED
with COMMENTS
 In EPA Letter Dated:
27 JAN 2009

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

802-580

Keep out of reach of children

CAUTION

See back panel for additional precautionary statements and first aid.

NET CONTENTS 1 GALLON (3.7 l)

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed. Avoid contact with eyes, skin or clothing. When using this product, wear goggles, long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves. Avoid contamination of food or feedstuffs. After using this product, rinse gloves before removing, remove clothing and launder 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. Do not allow people (other than applicator) or pets on treatment area during application. Do not reenter or permit others to reenter treated areas until sprays have dried.

FIRST AID

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

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 inhaled: Move 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.

If on skin or on 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 the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ENVIRONMENTAL HAZARDS

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.

DIRECTIONS FOR USE

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

General Precautions and Restrictions

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 area until sprays have dried. Shake well before using. For household use only.

WHAT IS THIS PRODUCT? AND WHAT WILL IT DO?

Ready-To-Use LAWN WEED KILLER is the convenient way to kill even the worst lawn weeds - roots and all - without harming the grass. In California and the Southwest, do not use this product on Dichondra, St. Augustinegrass, bahia grass, centipedegrass, carpetgrass, bermudagrass, buffalograss or Zoysia lawns.

Controls more than 200 weeds! Including any or all of the following:

- | | | |
|---------------------------|---------------------|---------------------|
| Annual yellow sweetclover | Catchweed bedstraw | Hairy fleabane |
| Aster | Catnip | Hawkweed |
| Austrian fieldcress | Catsear | Healall |
| Bedstraw | Chickweed, common | Heartleaf drymary |
| Beggarticks | Chickweed, mouseear | Heathaster |
| Betony, Florida | Chicory | Hedge bindweed |
| Bindweed, field | Cinquefoil | Hedge mustard |
| Bird vetch | Clover, crimson | Hemp |
| Bitter wintercress | Clover, hop | Henbit |
| Bittercress, hairy | Clover, red | Hoary cress |
| Bitterweed | Clover, strawberry | Hoary plantain |
| Black-eyed Susan | Clover, sweet | Hoary vervain |
| Black medic | Clover, white | Horsenettle |
| Black mustard | Cockle | Jimsonweed |
| Blackseed plantain | Cocklebur | Knawel |
| Blessed thistle | Common mullein | Knotweed |
| Bloodflower milkweed | Creeping jenny | Kochia |
| Blue lettuce | Cudweed | Lambsquarters |
| Blue vervain | Curly dock | Lespedeza |
| Bracted plantain | Daisy, English | Mallow |
| Brassbuttons | Daisy fleabane | Matchweed |
| Bristly oxtongue | Daisy, oxeye | Mexicanweed |
| Broadleaf dock | Dandelion | Milk vetch |
| Broadleaf plantain | Dichondra | Morningglory |
| Broomweed | Dogbane | Mouseear hawkweed |
| Buckhorn | Dogfennel | Mugwort |
| Buckhorn plantain | Dollarweed | Musk thistle |
| Bulbous buttercup | Elderberry | Mustard |
| Bull thistle | False dandelion | Narrowleaf plantain |
| Bullnettle | False flax | Narrowleaf vetch |
| Burclover | False sunflower | Nettle |
| Burdock | Fiddleneck | Orange hawkweed |
| Burning nettle | Florida pusley | Oriental cocklebur |
| Burweed | Frenchweed | Oxalis |
| Buttercup | Galinsoga | Parsley-piert |
| Buttonweed | Goathead | Parsnip |
| Canada thistle | Goldenrod | Pearwort |
| Carolina geranium | Ground ivy | Pennycress |
| Carpetweed | Gumweed | Pennywort |

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Peppergrass	Slender plantain	Wavyleaf bullthistle
Pepperweed	Smallflower galinsoga	Western clematis
Pigweed	Smooth dock	Western salsify
Pineywoods bedstraw	Smooth pigweed	White mustard
Plains coreopsis (tickseed)	Sorrel	Wild aster
Plantain	Sowthistle	Wild buckwheat
Poison ivy	Spanishneedles	Wild carrot
Poison oak	Speedwell	Wild four-o'clock
Pokeweed	Spiny amaranth	Wild garlic
Poorjoe	Spiny cocklebur	Wild geranium
Prairie sunflower	Spiny sowthistle	Wild lettuce
Prickly lettuce	Spotted catsear	Wild marigold
Prickly sida	Spotted spurge	Wild mustard
Prostrate knotweed	Spurweed	Wild onion
Prostrate pigweed	Stinging nettle	Wild parsnip
Prostrate spurge	Strawberry, India mock	Wild radish
Prostrate vervain	Tall nettle	Wild rape
Puncturevine	Tall vervain	Wild strawberry
Purslane, common	Tansy ragwort	Wild sweet potato
Ragweed	Tansy mustard	Wild vetch
Red sorrel	Tanweed	Woodsorrel
Redroot pigweed	Thistle	Woolly croton
Redstem filaree	Trailing crownvetch	Woolly morningglory
Rough cinquefoil	Tumble mustard	Woolly plantain
Rough fleabane	Tumble pigweed	Wormweed
Russian pigweed	Velvetleaf	Yarrow
Russian thistle	Venice mallow	Yellow rocket
Scarlet pimpernel	Virginia buttonweed	Yellowflower pepperweed
Scotch thistle	Virginia creeper	And other broadleaf weeds
Sheep sorrel	Virginia pepperweed	
Shepherdspurse	Water pennywort	

HOW DO I USE THIS PRODUCT?

When To Use: Spray any time weeds are actively growing; spring and fall are the best. Do not spray when rain is expected within 24 hours.

What To Do: This product is ready to use and doesn't have to be mixed with water. Shake well before using. Adjust sprayer nozzle to give a coarse spray. Spray individual weeds. Wet solid patches of weeds well. Wait for 24 hours after spraying to water the lawn. Continue to water and feed the lawn, to help fill in places where weeds have died. After 4 weeks, you may re-seed any remaining bare areas.

What Not To Do: Do not use on newly planted lawns until 6 weeks after seed has come up. Do not allow spray mist to drift onto vegetables, flowers, ornamental shrubs and trees, small fruits, fruit trees, or any other desirable plants. They will be damaged. Do not water the lawn for 24 hours after spraying. Do not spray Ready-To-Use LAWN WEED KILLER in areas where shrub or tree roots may be located.

WHAT WILL I SEE?

Within 10 days you will see the leaves begin to curl and twist. Weeds will gradually die, taking several weeks to completely disappear.

STORAGE AND DISPOSAL

Store this product in its original container and keep out of reach of children and domestic animals. 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

*TRIMEC® is a registered trademark of PBI/Gordon Corporation.

NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

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