

MAY 8 2000

Angela Tessier  
Griffin Corporation  
P.O. Box 1847  
Valdosta, GA 31603-1847

Dear Ms. Tessier:

Subject: Sub-label With No In-Scope Worker Protection Standard Uses  
Direx 4L Herbicide  
EPA Registration No. 1812-257  
Your Submission Dated April 6, 2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- a. The front panel referral statement says "See Label For Additional Precautions and Directions For Use" Please note that 40 CFR 156.10(i)(1)(ii) only allows that the Directions For Use may appear on printed or graphic matter which accompanies the pesticide and is securely attached. If all of the Precautionary Statements and First Aid Statements cannot appear on the container label due to size constraints, you should formally submit a request for a size exemption from the regulations.
- b. In the Precautionary Statements section delete the second "Precautionary Statements:" between CAUTION and "Harmful if swallowed".
- c. In the Non-Agricultural Use Requirements section move "Non-Crop weed control is not within scope of the Worker Protection Standard" to the preceding paragraph.

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d. The claims "For use on plants in non-crop and non-timber areas only" and the heading "Non-Crop Weed Control" on pages 2 and 4 are too broad. Either delete these claims or add a statement similar to the following:

For use in utility, highway, pipeline and railroad rights of ways, petroleum farms, lumberyards, storage areas, industrial plant sites, around farm building and similar non-crop areas.

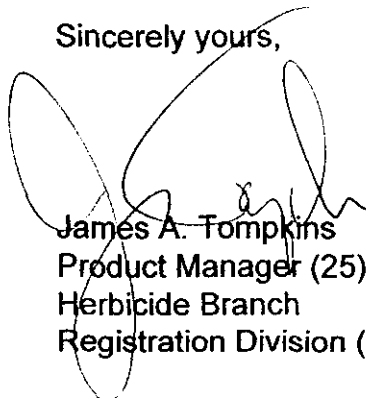
e. The phrase "many plants" on page 4 is too broad. We will accept the phrase "listed weeds".

f. When the labeling is printed assure that the decimal points in the ingredient declaration align on the same margin.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



James A. Tompkins  
Product Manager (25)  
Herbicide Branch  
Registration Division (7505C)

Enclosure

# KARMEX® IWC 4L

Herbicide

Diuron Flowable Herbicide

**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated:

MAY 8 2000  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
1812-257

**ACTIVE INGREDIENT:**

Diuron (3- [3,4-dichlorophenyl]-1,1-dimethylurea)..... 40.0%

**INERT INGREDIENTS:**..... 60.0%

**TOTAL**.....100.0%

\*Contains 4.0 lbs. of Diuron per gallon.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**STATEMENT OF PRACTICAL TREATMENT**

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention if irritation persists.

**IF IN EYES:** Flush with plenty of water. Get medical attention if irritation persists.

**For medical emergencies involving this product, call toll free 1-888-324-7598.**

**See Label For Additional Precautions and Directions For Use.**

GRIFFIN LLC  
VALDOSTA, GEORGIA 31601

EPA Reg. No. 1812-257  
EPA Est. No. 1812-GA-3

Net Contents 2½ gallons

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)**  
**CAUTION**

Precautionary Statements: Harmful if swallowed, inhaled or absorbed through the skin. Do not get in eyes or on skin. Do not breathe spray mist. If swallowed, induce vomiting. Get medical attention. If inhaled, remove victim to fresh air. If on skin, remove by washing. Get medical attention if irritation persists. If in eyes, flush with plenty of water. Get medical attention.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spills.

**PERSONAL PROTECTIVE EQUIPMENT**

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks

Follow manufacturer's instructions for cleaning/ maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Karmex IWC 4L Herbicide should be used only in accordance with recommendations on this label. For use on plants in non-crop and non-timber areas only. Not for use on crops, timber, or other

plants being grown for sale or other commercial use, or for commercial seed production or for research purposes.

Griffin will not be responsible for losses or damages resulting from use of this product in any manner not specifically recommended by Griffin. User assumes all risk associated with non-recommended use.

#### **NON-AGRICULTURAL USE REQUIREMENTS**

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Non-crop weed control is not within the scope of the Worker Protection Standard.

Keep unprotected persons out of treated areas until sprays have dried.

#### **STORAGE AND DISPOSAL**

**STORAGE:** Store product in original container only, away from other pesticides, fertilizer, food or feed.

**PRODUCT DISPOSAL:** Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### **GENERAL INFORMATION**

Injury to or loss of desirable trees or other plants may result from failure to observe the following:

Do not apply or drain or flush equipment on or near desirable trees or other plants, or on areas where their roots may extend or in locations where the chemical may be washed or moved into contact with their roots. Do not use on home plantings, trees, shrubs or herbaceous plants, lawns, walks, driveways, grass tennis courts or similar areas. Prevent drift of spray to desirable plants. Do not contaminate any body water. Do not mix/load or use near wells including abandoned wells and sink holes. Avoid storage of pesticides near well sites. Keep from contact with fertilizers, insecticides, fungicides and seeds. Calibrate sprayers only with clean water away from the well site. Do not apply this product through any type of irrigation system.

Thoroughly clean all traces of Karmex IWC 4L from application equipment immediately after use. Flush tank, pumps, hose and boom with several changes of water after removing nozzle tips and

screens (clean parts separately).

Karmex IWC 4L is to be mixed with water and applied as a spray for control of weeds in non-cropland areas. It is non-corrosive to equipment, non-flammable and non-volatile.

Weeds species vary in susceptibility to Karmex IWC 4L and they may be more difficult to control when under stress. Combinations of Karmex IWC 4L with other herbicides (as registered) increase the number of weed species controlled. Consult labels of the companion product for this and other information. Observe all precautions on labeling of all products used in mixtures.

### NON-CROP WEED CONTROL

Karmex IWC 4L is an effective general herbicide for the control of many weeds. The degree of control and duration of effect will vary with amount of chemical applied, soil type, rainfall and other conditions. Karmex IWC 4L may be used as a preemergence treatment at any time of the year except when ground is frozen, provided adequate moisture is supplied by rainfall or artificial means to activate the herbicide. Best results are obtained if applied shortly before weed growth begins. If dense growth is present, remove tops and spray the ground.

Increased contact activity on established weeds may be obtained by the addition of a non-ionic surfactant. Apply as a drenching spray to actively growing weeds during warm weather when daily temperature will exceed 70° F.

Use a fixed-boom power sprayer properly calibrated to insure a constant rate of application. Mix proper amount of Karmex IWC 4L into volume of water necessary to obtain uniform coverage. If a surfactant is used, dilute with 10 parts of water and add as last ingredient to nearly full tank. Karmex IWC 4L must be kept in suspension at all times. Agitate by mechanical or hydraulic means in the spray tank. If bypass or return line is used, it should terminate at bottom of tank to minimize foaming. Use 50 mesh or larger screens. To control most annual weeds for an extended period of time on non-cropland such as utility, highway, pipeline and railroad right of ways, petroleum tank farms, lumberyards, storage areas, industrial plant sites, around farm buildings and similar areas apply 4 to 12 quarts per acre to control annual weeds including:

#### **Broadleaves**

#### **4 to 12 quarts/acre**

Ageratum  
Chickweed  
Cocklebur  
Corn speedwell  
Corn spurry  
Dayflower  
Dogfennel

Knawel  
Kochia  
Lambsquarter  
Marigold  
Mexican clover  
Morningglory,  
annual

Ragweed  
Sesbania  
Shepherdspurse  
Sicklepod  
Smartweed,  
annual  
Sowthistle,

Fiddleneck (amsinckia)	Pennycress	annual
Fora's paintbrush	Pigweed	Spanishneedles
Gromwell	Pineappleweed	Tansymustard
Groundcherry,	Pokeweed	Velvetleaf —
annual	Prickly lettuce	(buttonweed)
Hawksbeard	Prickly sida	Wild buckwheat
Horsenettle	(teaweed)	Wild lettuce
Horseweed	Purslane	Wild mustard
	Rabbit tobacco	Wild radish

### Grasses

#### 4 to 6.4 quarts/acre

Barnyardgrass (watergrass)	Orchardgrass	Seedling johnsongrass
Bluegrass,	Peppergrass	Velvetgrass
annual	Quackgrass	Vernalgrass, =
Crabgrass	Rattail fescue	sweet, annual
Foxtail	Red sprangletop	
Kyllinga	Ricegrass	
Lovegrass,	Ryegrass,	
annual	annual	
	Sandbur	

#### 6.4 to 12 quarts/acre

Guineagrass  
Maidencane  
Pangolagrass

**Irrigation and drainage ditches:** Apply 4 to 12 quarts per acre to control most annual weeds as shown above. Apply only when water is not in the ditch. For irrigation ditches, apply during the non-crop season, and when ditch is not in use. To avoid crop injury, it is essential to minimize movement of Karmex IWC 4L in irrigation water. The herbicide must be fixed in the soil by moisture. Apply before expected seasonal rainfall, if possible when soil in the ditch is still moist. Following treatment, if rainfall has not totaled at least 4 inches, fill ditch with water and allow to stand for 72 hours. Drain off and waste remaining water before using ditch. Do not treat any ditch area into which roots of trees or other desirable plants may extend as injury may result.

**WARRANTY STATEMENT**

GRIFFIN warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials or the manner of use or application, all of which are beyond the control of GRIFFIN. In no case shall GRIFFIN be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price paid for this product or at Griffin Corporation's election, the replacement of this product.

GRIFFIN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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