

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

JUL 29 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Craig Martens
PBI/ Gordon Corporation
1217 West 12th Street
Kansas City, MO 64101-0090

Subject: Gordon's Crabgrass and Nutgrass Killer
EPA Registration No. 2217-630
Revised labeling submitted June 14, 2005

Dear Mr. Martens:

The amended labeling referred to above is acceptable provided that you make the following changes:

1. In the precautionary statements, delete the statements at the end of the paragraph starting with "Avoid contamination"
2. In the first aid section, put the "If Swallowed" statement first.
3. Add the following "User Safety Recommendations" section:

"User Safety Recommendations"

"Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet."

"Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing."

"Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing."

a/b

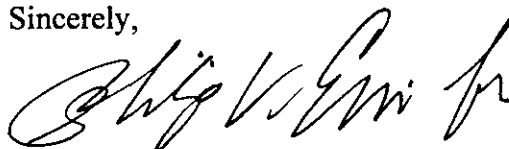
4. In the "Storage and Disposal" section, add the following immediately following the "Storage and Disposal" heading: "Do not contaminate food or feed by storage or disposal." Change the subheading "Storage" to "Pesticide Storage".

5. In item 4 of the "When and How to Apply" section, delete the sentence that begins "For example..." The "example" does not clarify the directions to treat the area uniformly.

This labeling supercedes all previously accepted labeling for this product (except supplemental labeling). A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, you may call Tobi Colvin-Snyder at 703-305-7801.

Sincerely,



Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

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GORDON'S® CRABGRASS AND NUTGRASS KILLER

ACTIVE INGREDIENT:		
*Monosodium acid methanearsonate.....		16.6%
INERT INGREDIENTS.....		83.4%
	TOTAL	100.0%

*Total Arsenic (as elemental) all in water soluble form - 7.68%
This product contains 1.6 pounds MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panels for Precautionary Statements and First Aid.

NET CONTENTS ONE PINT

847 AP-----
EPA REG NO 2217-630
EPA EST NO 2217-KS-1
MANUFACTURED BY:



Telephone: 1-800-821-7925

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 29 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-630

EPA Reg. No. 2217-630

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READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with eyes, skin or clothing. Avoid breathing of spray mist. Wash hands after using. Wear protective clothing when handling or applying this product, including long pants, long-sleeved shirt, and impermeable gloves and boots. Avoid contamination of food and feedstuffs. Keep children and domestic animals off treated area until this material has been watered into the soil and the grass is dry. Keep livestock off treated areas.

First Aid

If in eyes:	<ul style="list-style-type: none"> • 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.
If on skin or clothing:	<ul style="list-style-type: none"> • 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 swallowed	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • 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 treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.</p>	

ENVIRONMENTAL HAZARDS:

Do not apply directly to water. Do not contaminate waters used for domestic consumption, or by wildlife or aquatic life, or for irrigation purposes. Do not apply when weather conditions favor drift from treated area. Do not apply where runoff is likely to occur. 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.

STORAGE & DISPOSAL

STORAGE: Store in original container in a locked storage area inaccessible to children or pets. Do not store near food or feedstuffs. Keep tightly closed when not using.

CONTAINER DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partially filled: Call your local solid waste agency or toll free number (1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

GENERAL INFORMATION:

Gordon's Crabgrass & Nutgrass Killer contains MSMA and provides selective weed control in established bluegrass, zoysiagrass and bermudagrass lawns.

WEEDS CONTROLLED:

Grassy Weeds - Crabgrass, Dallisgrass, Sandbur, Goosegrass, Barnyardgrass, Johnsongrass and *Brachiaria spp.*

Sedges - Nutgrass (Yellow Nutsedge)

Broadleaf Weeds - Cocklebur, Puncturevine, Chickweed, Oxalis (Wood Sorrel) and Pigweed.

USE PRECAUTIONS:

- ◆ Do not use on newly seeded lawns until after the third mowing.
- ◆ Do not use on St. Augustinegrass, centipedegrass, or bahiagrass. This product may injure fescue, bentgrass, and carpetgrass.
- ◆ Keep children and domestic animals off treated area until this material has been watered into the soil and the grass is dry.
- ◆ Do not use a hose end sprayer.
- ◆ Do not use high sprayer pressure since fine droplets could be formed which might drift to nearby sensitive plants.

ABOUT NUTGRASS (NUTSEDGE):

Nutgrass grows from seed and small nut-like tubers on the roots. Unless controlled, nutgrass will spread rapidly. Look for grass-like, but triangular yellowish green leaves growing upright above the normal lawn grass. Make application promptly to prevent seed and tuber formation. Treat only infested areas since some temporary yellowing of the lawn grass may occur. Where only a few nutgrass plants are found, place 2 or 3 drops of undiluted chemical directly in the crown of the plant (an eye dropper or small spoon may be used) and retreat in 10 to 14 days.

WHEN & HOW TO APPLY:

Apply anytime when temperatures are above 75°F. Apply when weeds are small and are easier to kill than larger, mature plants. Determine average size of growth of plants to be treated and make dilution as given in the table. On new lawns, wait until after the third mowing before treating. Be sure soil is moist and lawn healthy before treating. During drought, water grass well several days in advance and restore turf to healthy green color with fertilizer before treating. Treat only infested areas since some temporary yellowing of the lawn grass may occur. If directions are followed, turf grasses will quickly return to normal. Repeat applications may be necessary if new growth appears. Use hand-operated sprayers (plunger or pump-up sprayer).

1. Keep lawn mowed about 1½ to 2 inches during treatment.
2. Water lawn well before treatment.
3. Set sprayer wand at low pressure for coarse droplet spray.
4. Apply uniformly over the area to be treated. For example: 2 tablespoons (for young seedlings) in 1 gallon of water covers 250 square feet.
5. Flush out sprayer with clean water.
6. Repeat treatments as needed. A second application of this product may be necessary 10 - 14 days later for dense weed populations, mature crabgrass and dallisgrass.
7. Optimum results may not be obtained if rainfall or watering occurs within 24 hours after application.

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DILUTION TABLE FOR HAND-OPERATED SPRAYERS (DO NOT USE A HOSE END SPRAYER)

Amount of Product to Use		
Young Plants or 90° Weather	Amount of Water In Sprayer	Area to be Treated
1 1/8 tsps.	24 fl. oz.	50 sq. ft.
1 1/2 tsps.	32 fl. oz.	60 sq. ft.
2 Tbs. or 1 fl. oz.	1 gal.	250 sq. ft.
4 Tbs. or 2 fl. oz.	2 gal.	500 sq. ft.
6 Tbs. or 3 fl. oz.	3 gal.	750 sq. ft.
8 Tbs. or 4 fl. oz.	4 gal.	1,000 sq. ft.

Amount of Product to Use		
Older Plants or 75° Weather	Amount of Water In Sprayer	Area to be Treated
1 1/2 tsps.	24 fl. oz.	50 sq. ft.
1 7/8 tsps.	32 fl. oz.	60 sq. ft.
2 1/2 Tbs. or 1 1/4 fl. oz.	1 gal.	250 sq. ft.
5 Tbs. or 2 1/2 fl. oz.	2 gal.	500 sq. ft.
7 1/2 Tbs. or 3 3/4 fl. oz.	3 gal.	750 sq. ft.
10 Tbs. or 5 fl. oz.	4 gal.	1,000 sq. ft.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.