

2217-758

4/28/2011

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

James L. Kunstman
PBI/Gordon Corporation
1217 West 12th Street
Kansas City, MO 64101

APR 28 2011

Subject: Response to RED Amendment
Product Name: Trimec 937 Herbicide
EPA Reg. No. 2217-758
Decision No. 430166

Dear Dr. Kunstman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records. Submit one (1) copy of final printed labeling before you release the product for shipment.

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| User Safety Recommendations | |
| <ul style="list-style-type: none"> • 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. If pesticide gets on skin, wash immediately with soap and water. • 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. | |

| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 on 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"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give any liquid to the person. • 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. |
| 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. | |
| Note to Physician: May pose an aspiration pneumonia hazard. Contains petroleum distillates. | |

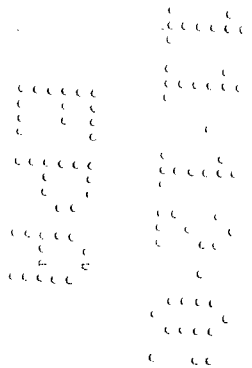
Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. 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.

Physical Or Chemical Hazard

Do not use or store near heat or open flame.



- Utility rights-of-way: Telephone, pipeline, electrical powerlines, and communication transmission lines

B. Prohibitions for Noncropland Sites.

- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (noncropland sites adjacent to the edges of a body of water) for lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays).
- Do not apply to wetlands (swamps, bogs, potholes, or marshes).
- Do not apply to agricultural irrigation water or on agricultural irrigation ditchbanks and canals.
- Do not apply to agricultural drainage water or on agricultural ditchbanks.

INSTRUCTIONS:

To effectively control brush, all leaves, stems and suckers should be thoroughly wetted to the ground. Apply when plants come into full leaf (spring) until plants begin to go dormant. Best results are obtained when brush and broadleaf weeds are young and actively growing. Do not cut brush until the herbicide has translocated throughout the plant causing root death.

USE PRECAUTIONS:

Do not apply this product through any type of irrigation system.

SPRAY PREPARATION AND TANK MIXTURES:

Water Spray: Add one-half the required amount of water to the spray tank, then add Trimec® 937 Herbicide slowly with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

Full Oil Spray: Use diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or basal oils. Add one-half the required amount of oil to the spray tank, then add Trimec® 937 Herbicide with agitation and complete filling the tank with oil. Mix thoroughly and provide adequate agitation during mixing and spraying.

Tank Mixing with Garlon® 4 Herbicide: Trimec® 937 Herbicide can be mixed with Garlon® 4 Herbicide for use in, roadsides, rights-of-way, railroads, fencerows, industrial sites and other similar noncrop areas. Garlon® 4 Herbicide is a butoxyethylester formulation containing 4.0 pounds per gallon of the active ingredient triclopyr. A mixture of Trimec® 937 Herbicide and Garlon® 4 Herbicide should be used in accordance with the more restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing.

Three steps for tank mixing with Garlon® 4 Herbicide are suggested. First, add one-third of the required amount of diesel oil or water to the spray tank. Next, add the Trimec® 937 Herbicide slowly with agitation, then add another one-third of the carrier to the tank. Finally, add slowly the Garlon® 4 Herbicide and the balance of the carrier. Do not mix the chemicals simultaneously and continue the agitation during each step.

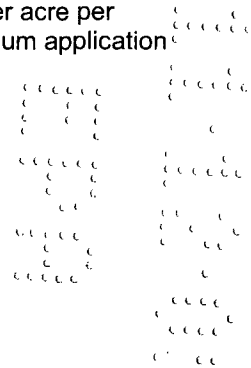
DIRECTIONS, RESTRICTIONS AND LIMITATIONS FOR USE IN NON-CROPLAND

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Broadcast Applications to Annual and Perennial Weeds:

Apply to emerged weeds. For best results, treat when weeds are young and actively growing.

The maximum application rate to general noncropland sites is 0.8 gallon of product per acre per application per site. Number of applications: Limited to 2 applications per year. Minimum application interval: 30 days. Spray volumes greater than 10 gallons per acre are suitable.



Broadcast applications to woody plants: Apply to trees and brush when foliage is fully expanded and plants are actively growing.

Use 1 broadcast application for rights-of-way, including electrical power lines, communication lines, pipelines, highways and railroads that intersect wooded areas or stands of trees, brush and woody plants.

The maximum noncropland application rate for tree, brush and woody plant control is 2.0 gallons of product per acre per application per site. Number of applications: Limited to 1 application per year. Spray volumes greater than 10 gallons per acre are suitable.

High volume foliar applications (100 to 400 gallons per acre):

Apply 0.5 to 2.0 gallons of product per acre with adequate water or apply a 0.5 to 2.0% vol/vol spray solution as a full cover spray with high volume equipment. Use the lower spray concentrations in the range for susceptible species and use the higher spray concentrations within the range for hard-to-control species, for mature plants during the late summer or under adverse environmental conditions (e.g. drought).

Spray broadleaf weeds, woody plants or mixed brush uniformly and thoroughly by wetting all leaves, stems, bark and root collars. The total volume of spray solution required for adequate coverage of solid stands of mixed brush can range from 100 to 400 gallons of spray solution per treated acre. The spray preparation chart for applications on a spray-to-wet basis is shown below in Table 1.

Table 1. Instructions for preparing 100 to 400 gallons of spray solution at 0.5 to 2.0% spray concentration with water for high volume foliar applications.

| Spray solution per acre, Gallons | Amount of Product Needed for Spray Concentration of: | | | |
|-------------------------------------|------------------------------------------------------|----------------|----------------|----------------|
| | 0.5% | 0.67% | 1.0% | 2.0% |
| 100 gal | 0.5 gal | 0.67 gal | 1.0 gal | 2.0 gal |
| 200 gal | 1.0 gal | 1.34 gal | 2.0 gal | ---- |
| 300 gal | 1.5 gal | 2.0 gal | ---- | ---- |
| 400 gal | 2.0 gal | ---- | ---- | ---- |

Equal measures: 1 gallon = 4 quarts = 8 pints = 128 fl.oz.

The maximum seasonal application rate for trees, brush and woody plant control is 2.0 gallons of product per acre per application per site. Number of applications: Limited to 1 application per year.

For Backpack Sprayers, Knapsack Sprayers, And Hand-pressurized Pump Sprayers

Table 2. Instructions for preparing 1 to 3 gallons of spray solution at 0.5 to 2.0% spray concentration with water for high volume foliar applications.

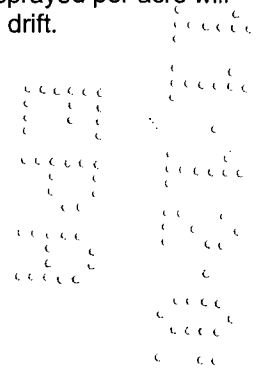
| Gallons of Water | Amount Of Product Needed for Spray Concentration of : | | | |
|------------------|-------------------------------------------------------|-----------------|-----------------|----------------|
| | 0.5% | 0.67% | 1.0% | 2.0% |
| 1 | 4 teaspoons | 5 teaspoons | 2.5 tablespoons | 5 tablespoons |
| 2 | 2.5 tablespoons | 3.5 tablespoons | 5 tablespoons | 10 tablespoons |
| 3 | 2 fl.oz. | 2.5 fl.oz. | 4 fl.oz. | 8 fl.oz. |

Equal measures: 1 fl.oz. = 2 Tablespoons (Tbs.) = 6 Teaspoons (tsp.)

Individual Plant Treatments:

Use only one basal spray, frill or cut surface application per year.

Basal Bark: Apply with low volume backpack sprayer or power equipment. Volume sprayed per acre will depend on method used and number of stems per acre. Use a coarse spray to avoid drift.



High Volume Basal Bark: For high volume applications, apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed.

Mix 3.0 to 4.0 gallons of Trimec® 937 Herbicide with 95 to 97 gallons of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, or mineral oil). Spray volumes will depend upon the sizes, types, and densities of the species present.

Low Volume Basal Bark: For low volume applications, apply a uniform spray pattern to all sides of the stems and trunks up to a height of 18 to 24 inches. Treat the entire circumference of the tree.

Mix a full oil spray containing 33% Trimec® 937 Herbicide, 10 to 20% surfactant, and 47 to 57% diesel oil. Suggested surfactants include Cide-Kick, Cide-Kick II, or other surfactants/penetrants appropriate for oil soluble herbicides. Substitutes for diesel oil as a diluent include the following basal oils: Androc Oil, Hy-Grade I, Arborchem Basal Oil, JLB Oil Plus, and other blends formulated for basal bark applications.

Cut Surface – Stump: This method can be used at anytime of the year, but is more effective when applied as soon as possible after trees are cut. Spray the entire stump, particularly bark and exposed roots. Complete control requires a thorough drenching. Use this method after original or capital clearing. It is the primary step toward a chemical brush control program on newly cleared highways and rights-of-way. Spray is most effective and economical on tree stumps with diameters larger than 3 to 4 inches.

Mix 0.5 to 1.0 gallon of Trimec® 937 Herbicide with 25 gallons of diesel oil, basal oils, penetrant oils, or mineral oil. Apply to freshly cut tree stumps with a low volume knapsack sprayer using a cone nozzle. Spray thoroughly the cut surfaces, bark, and exposed roots. Treat the entire circumference of the tree. Drench until runoff to the soil surface is noticed.

For painting freshly cut stumps, mix 2 quarts of Trimec® 937 Herbicide with 1.0 gallon of basal oil and thoroughly paint all surfaces of the stump.

Frill Treatment: This treatment is recommended for culling trees with trunk diameters greater than 5 to 6 inches. Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark, but do not remove chips.

Mix 3.0 to 4.0 gallons of Trimec® 937 Herbicide in 100 gallons of diesel oil or mineral oil and treat freshly cut frills anytime of the year. Spray or pour the spray mixture into the frills without runoff.

| BRUSH CONTROLLED: | | | |
|-------------------|------------|-----------------|-----------------|
| Ash | Buckbrush | Honey locust | Shortleaf pine |
| Aspen | Cedar | Honeysuckle | Spruce |
| Birch | Cherry | Kudzu | Sumac |
| Blackberry | Cottonwood | Maple | Sycamore |
| Black cherry | Dogwood | Multiflora rose | Trumpet creeper |
| Black locust | Elm | Oak | Wild plum |
| Brambles | Gooseberry | Pine | Willow |

| BROADLEAF WEEDS | | | |
|------------------------------------|-----------------------------------------------------|---------------------------------------------------|-----------------------------------------|
| Aster, white heath & white prairie | Dock | Matchweed | Shepherdspurge |
| Bedstraw | Dogfennel | Mouseear chickweed | Spotted spurge |
| Beggarweed, creeping | English daisy | Mustard | Spurge |
| Bindweed | False dandelion (*spotted catsear & common catsear) | Nettle | Sunflower |
| Black medic | Field bindweed | Oxalis (*yellow woodsorrel & creeping woodsorrel) | Thistle |
| Broadleaf plantain | (*morningglory & creeping jenny) | Parsley-piert | Velvetleaf (*pie marker, Indian mallow) |
| Buckhorn plantain | Field oxeye-daisy (*creeping oxeye) | Pennsylvania smartweed (*smartweed) | Veronica (*corn speedwell) |
| Bull thistle | | Pennywort (*dollarweed) | Virginia buttonweed |
| Burclover | | | White clover (*Dutch clover, |

| BROADLEAF WEEDS | | | |
|---------------------|------------------------------|----------------------------|---------------------------|
| Burdock, common | Filaree, whitestem & redstem | Pepperweed | honeysuckle clover, white |
| Buttercup, creeping | Florida pusley | Pigweed | trefoil & purplewort) |
| Carpetweed | Ground ivy | Pineappleweed | Wild carrot |
| Chickweed, common | Groundsel | Plantain | Wild garlic |
| Chicory | Hawkweed | Poison ivy | Wild geranium |
| Cinquefoil | Healall | Poison oak | Wild lettuce |
| Clover | Henbit | Prostrate knotweed | Wild mustard |
| Cocklebur | Jimsonweed | (*knotweed) | Wild onion |
| Compassplant | Kochia | Puncturevine | Wild strawberry |
| Curly dock | Lambsquarters | Purslane | Wild violet |
| Dandelion | Lawn burweed | Ragweed | Yarrow |
| Dayflower | Lespedeza, common | Red sorrel (*sheep sorrel) | Yellow rocket |
| Deadnettle | Mallow, common | | |
| *Synonyms | | | |

For Use on Residential and Ornamental Turfgrass Sites and Sod Farms (Cool-Season Grasses Other Than Bentgrass):

USE PRECAUTIONS:

Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present. Use only lawn type sprayers. Do not exceed specified dosages for any area. Do not apply to newly seeded grasses until well established. Do not spray when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application.

Do not use this product on or near desirable plants, including within the drip line of desirable trees and shrubs, since injury may result.

INSTRUCTIONS:

Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

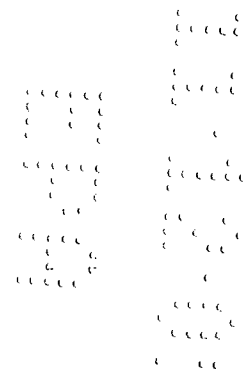
Apply 2.0 to 3.0 pints of product in 20 to 260 gallons of water per acre (0.75 to 1.1 fluid ounces of product in 0.5 to 6.0 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

Limitations on broadcast treatments for ornamental turfgrass and sod farms:

The maximum application rate is 3.0 pints of product per acre per application (0.71 lb 2,4-D ae, 0.35 lb 2,4-DP-p ae, and 0.18 lb dicamba ae per acre per application). For ornamental turfgrass, the maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. For sod farms, the maximum number of broadcast applications is limited to 2 per year with a minimum of 21 days between applications. The maximum seasonal rate is 6.0 pints of product per acre (1.42 lb 2,4-D ae, 0.71 lb 2,4-DP-p ae, and 0.35 lb dicamba ae per acre per year).

Controlled Droplet Applicator (CDA) - Add 1.5 pints to the Herbi container and fill with water. Spray contents over 33,000 square feet. Avoid overlapping between spray patterns.

Spot treatments - Not recommended for hose end sprayers. Spray during the growing season when weeds are actively growing. On new lawns wait until the grass has hardened off, usually after it has been mowed at least three times. Poor weed control may result if spray is applied during drought or just before rain. Do not water within 24 hours after treatment.



| Spray Preparations For Hand Operated Sprayers | | |
|-----------------------------------------------|------------------|-----------------------|
| Amount of Product to Use: | Gallons of Water | Area To Treat, Sq.Ft. |
| 1.5 tablespoons (0.75 fl.oz.) | 1 gal | 1,000 sq.ft. |
| 3 tablespoons (1.5 fl.oz.) | 2 gal | 2,000 sq.ft. |
| 4.5 tablespoons (2.25 fl.oz.) | 3 gal | 3,000 sq.ft. |

Limitations on spot treatments for ornamental turfgrass:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 0.75 fl.oz. per 1,000 sq.ft. per application (0.24 lb 2,4-DP-p acid equivalent per acre). The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

Use only Medium or coarser spray nozzles according to ASAE (S 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

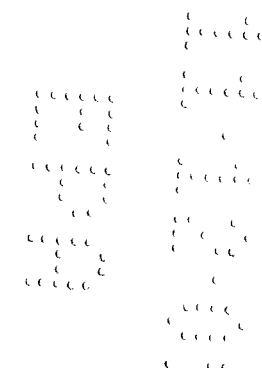
Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

2,4-D esters may volatilize during conditions of low humidity and high temperatures. Do not apply during conditions of low humidity and high temperatures.

Equipment

All ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates. Do not apply with a nozzle height greater than 4 feet above the target site. Aerial applications of this product are prohibited.



STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

[For Plastic Containers – Nonrefillable with capacities equal to or less than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]

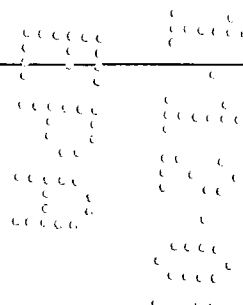
CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]



The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere. No employee or agent of the manufacturer or seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- A Brush Killer & Broadleaf Weed Herbicide
- For Broadleaf Weed Control In Turf
- One Gallon Covers Up To 4 Acres. - 8 Ounces Covers Up to 11,000 Square Feet
- Controls: ash, aspen, brambles, kudzu, oak, willows, dandelion, chickweed, knotweed, plantain, henbit, spurge and many other species of brush and broadleaf weeds including those listed on this label.

3. Trademark acknowledgements

- Garlon® Herbicide is a registered trademark of Dow AgroSciences, L.L.C.
- Cide-Kick and Cide-Kick II, JLB Oil Plus are products of JLB International Chemical, Inc.
- Arborchem Basal Oil is a product of Arborchem Products Co.
- Hy-Grade I is a product of CWC Chemical, Inc.
- Androc Oil is a product of Androc Products, Inc.

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00758.20091111.amend-proposed-clean.doc

2. Reason for Issue: incorporate EPA comments

