

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 19 2006

Richard Retzloff
Products Chemical Company
6400 Herman Av.
Cleveland, OH 44102

Dear Mr. Retzloff:

Label Revision Amendments
Veg Kil 15
EPA Reg. No. 8503-20
Submission dated December November 26, 2003

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable. You need to submit a revised label with the following changes:

1. Under "First Aid":

- a. You need to use a separate paragraph for each treatment.
- b. Under "If swallowed";

Replace "Have person sip a glass of water if able to swallow" with "Do not give **any** liquid to person."

- c. It is recommended that you place the First Aid statements in a box.

2. Under "Environmental Hazards";

Use the following statements:

"The product is toxic to fish. Do not apply directly to water, or in areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters or rinsate. Do not contaminate water used for irrigation or domestic purposes."

3. Under "Directions for Use";

a. Add the following statement:

"Do not apply this product in a way that will contact any person or pet, either directly or through drift. Only persons apply this product may be in the area during application."

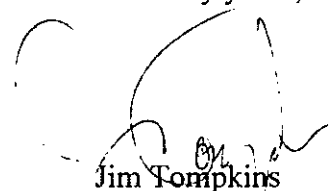
b. It is recommended that you add the following "Spray Drift Control" statements:

"Do not allow dust to drift from the application site and contact people, structures people occupy at any time and the associated property, parks and recreation areas, nontarget crops, aquatic and wetland areas, woodlands, pastures, rangelands, or animals. Apply only when wind speed is not more than 10 mph. For sprays, apply largest size droplets possible."

4. Under "Storage and Disposal";

Place the "Pesticide Disposal" statement ahead of the "Container Disposal" statement.

Sincerely yours,



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

CONCURRENCES

SYMBOL ▶	7505c	7505c						
SURNAME ▶	C.Bien	Tompkins						
DATE ▶	1-9-06							

GENERAL INFORMATION

For total weed control on certain areas around the home, the business, or workplace where no plant growth is desired, use as specified in label directions.

Prevents plant growth for up to one year.

This liquid 1.5% vegetation killer is a nonselective product intended for use without further dilution. For best results, apply to bare ground or when weed growth is just starting. Weed killer has considerable activity through foliar contact, however, much of its activity is through roots; therefore, its effectiveness is dependent on rainfall to move it into the root zone. Very dry soil conditions and lack of sufficient rainfall may result in poor weed control. Weeds taller than 4-6 inches should be hoed before treatment or it may be necessary to make a second application. A second application may be necessary to control deep-rooted perennial weeds. Use for bare ground vegetation control in driveways, brick walks, paths, patios, parking areas, play areas, along fences and curbs, around buildings, and under graveled pathways where plant growth has come through these surfaces.

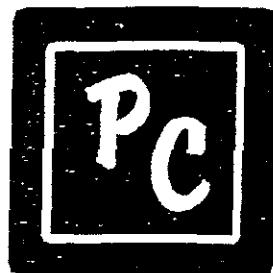
READ DIRECTIONS CAREFULLY BEFORE USING THIS PRODUCT. DIRECTIONS FOR USE

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

For control of annual and susceptible perennial weeds such as downy brome-grass, oatgrass, goosegrass, quackgrass, puncturevine, goldenrod, and plantain. To cover 100 sq. ft. apply 1-2/3 - 2-1/2 pints undiluted product by use of a sprinkling can or other watering or spraying device. For control of hard-to-kill perennial broadleaf and grass weeds such as bindweed and Johnsongrass as well as the biennials common mullein and wild carrot, use 6-2/3 - 9-1/3 pints per 100 sq. ft.

When using a sprinkling can, triple rinse and pour rinsate on area treated once application is complete. Mix only the quantity needed and use immediately. To minimize lateral movement, sprinkle lightly with a watering can or similar sprinkler device immediately after application.

PRECAUTIONS: 1) Apply when air is calm to avoid the possibility of drift onto desirable plants or grass. 2) Keep away from the roots of desirable plants and trees. 3) Use only in areas where complete control of all vegetation is desired. 4) VEG KILL 15 LIQUID VEGETATION KILLER SHOULD NOT BE USED ON CULTIVATED AREAS, ON GROUND THAT IS TO BE CULTIVATED, IN GREENHOUSES, OR NEAR THE DRIP LINE OF TREES OR SHRUBS. 5) Do not use on slopes or in areas where runoff is likely to occur (apply only to level surfaces). 6) Avoid using where adjacent desirable trees, shrubs, or plants may be injured from leaching of the chemical through the soil. 7) Keep children and animals off treated areas until these areas are dry.



VEG KILL 15

LIQUID VEGETATION KILLER FOR TOTAL VEGETATION CONTROL

ACTIVE INGREDIENT	
Prometon: 2,4-bis(isopropylamino)-6-methoxy -s-triazine	1.5%
INERT INGREDIENTS*	8.5%
TOTAL	100.0%

*Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panels for additional precautions

EPA Reg.No. 8503-20 EPA Est. No. 8503-OH-1

NET CONTENTS: ONE GALLON

ACCEPTED
with COMMENTS
in EPA Letter Dated

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

8503-20

PRECAUTIONARY HAZARD TO HUMANS AND CAUTION

KEEP OUT OF REACH OF CHILDREN. Harmful to skin. Avoid contact with eyes, skin and clothing. Causes substantial but temporary eye injury. Wash hands thoroughly after handling. Remove contaminated clothing and wash separately. Do not use for animal feedstuff, and domestic water supplies.

ENVIRONMENTAL
This concentrate is toxic to fish and wildlife. Do not contaminate water by cleaning of equipment or washwaters. Apply only as specified on this label.

FIRST AID

Have the product container or label with you when you are using this product or going for treatment.

If in eyes: Hold eye lid open and rinse slowly and gently with water for at least 15 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. If irritation persists, call a poison control center or doctor for treatment advice. **If on skin:** Wash with plenty of water. Remove contaminated clothing. Rinse skin immediately with plenty of water. Call a poison control center or doctor for treatment advice. **If swallowed:** 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 person is not breathing, call 911 or a local poison control center for further treatment advice.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEEDSTUFFS. DO NOT STORE CONTAINER ON SIDE.

PESTICIDE STORAGE - Store in a dry place not subject to freezing. Do not store at higher than 120°F.

CONTAINER DISPOSAL - Do not reuse empty container. Rinse container with water. Wrap container and put in trash.

PESTICIDE DISPOSAL - Pesticide wastes are acutely toxic. Always follow label directions. Do not mix or apply excess pesticide spray mixture, or rinsate in a way that will result in a spill. Do not be disposed of by use according to label instructions. For more information, contact your local or Environmental Control Agency, or the Hazardous Waste Management and Emergency Response (HWEM) EPA Regional Office for guidance.

WARRANTY STATEMENT

NOTICE: Seller warrants that the product conforms to the label directions under normal conditions of use, but neither makes any representation of MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, extends to the use of this product contrary to the label directions, or under conditions not reasonable for the risk of any such use.

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