

9198-201

11/15/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Debbie Ziehr
The Andersons Lawn Fertilizer Division, Inc
PO Box 119
Maumee, OH 43537

NOV 15 2011

Subject: Label Amendment
High K Fertilizer with TGR Poa Annua Control
EPA Registration No. 9198-201
Decision No. 389352
Submission Date: January 23, 2008
Resubmission: August 17, 2011

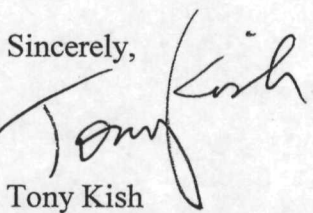
Dear Ms Ziehr:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended to include the statement "Do not use on home/residential lawns," is acceptable provided you make the following changes:

1. Pg 1-2 – Reorder statements as shown per the Label Review Manual page 3-9:
 - a. Product Name
 - b. "Do not use on home/residential lawns."
 - c. Ingredient Statement
 - d. Guaranteed Analysis
 - e. KOOROC/Signal Word/Precautionary statements
 - f. First Aid
 - g. Net Contents
 - h. PPE
 - i. User Safety Box
 - j. Environmental Hazards
 - k. Marketing Statements
2. Pg 1 – Adjust the size of the KOOROC statement and Signal Word according to page 3-11 of the Label Review Manual.
3. Pg 1 – Box in the First Aid statement

4. Pg 2 – Include the National Pollutant Discharge Elimination System (NPDES) statement, found on page 8-13 of the label review manual, in the Environmental Hazards section for package sizes greater or equal to 50 lbs.
5. Pg 5 – In the first two items and fourth item under the heading Precautions replace the words “Not for” with “Do not.”
6. Pg 5 – In the final paragraph replace the word “or” with “of” between “widespread discoloration” and “the fairway and...”
7. Pg 6 – Box in the Storage and Disposal section and revise the container disposal section by relocating the statement “offer for recycling if available, or” between “Then” and “dispose of empty bag...”

Submit one copy of your final printed labeling before you release the product for shipment. A copy of the labeling stamped “Accepted with Comments” is enclosed for your records. If you have any questions, please contact Dominic Schuler at (703) 347-0260 or via email at schuler.dominic@epa.gov.

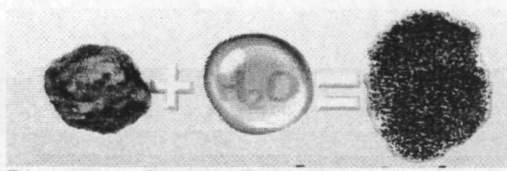
Sincerely,

Tony Kish
Product Manager (22)
Fungicides Branch
Registration Division (7504P)

HIGH K FERTILIZER WITH TGR™ POA ANNUA CONTROL

Do not use on home / residential lawns.

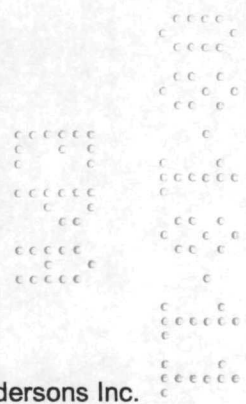
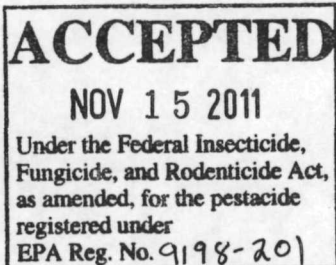
- Suppresses *Poa annua* growth in bentgrass, zoysiagrass, Kentucky bluegrass, and Kentucky bluegrass/perennial ryegrass fairways, tees, and roughs and bentgrass greens
- Encourages preferential and aggressive growth of bentgrass, zoysiagrass, Kentucky bluegrass, and perennial ryegrass into adjacent *Poa annua* areas
- Extends color response through controlled-release nitrogen feeding and growth modification

Optional Marketing Information:



Dispersing Granule Technology

www.andersonsturf.com



Andersons Golf Products and Contec DG are registered trademarks of The Andersons Inc.

Net Weight XXX lbs (XXX kg)

KEEP OUT OF REACH OF CHILDREN
CAUTION
PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Causes eye irritation. Do not graze treated areas. Do not feed clippings to livestock.

FIRST AID

- If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contacts, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
- If swallowed: Call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
- If on skin: 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 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 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 1-800-757-8951 for emergency medical treatment information.

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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 apply to steep slopes near water or when weather conditions favor drift from target areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

ACTIVE INGREDIENT:

Paclobutrazol † 0.34%

INERT INGREDIENTS: 99.66%

Total 100.00%

† CAS No. 76738-62-0

EPA Reg. No. 9198-201

EPA Est No. 9198-OH-1M, 9198-OH-2B, 9198-AL-001A

Underlined letter is first letter used in run code on bag

US Pat Nos. 3,705,794 and 3,989,470

Product of USA

Guaranteed Analysis

Total Nitrogen (N) XX%

Available Phosphate (P₂O₅) XX%

Soluble Potash (K₂O) XX%

Plant nutrients derived from:

For products being sold into states which require statement on fertilizer products:

Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-ap.com>

Florida Applications:

We recommend that you follow the Florida Green Industries BMP's at: http://www.flaes.org/pdf/BMP_Book_final.pdf

We recommend that you follow the Florida Golf Course BMP's at: <http://www.flaes.org/pdf/glfbmp07.pdf>



READ ALL DIRECTIONS PRIOR TO APPLICATION OF THE PRODUCT**DIRECTIONS FOR USE**

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

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Recent research has shown that environmental buffers prevent pollutants from entering our natural water bodies. To help protect these natural resources, please avoid applying product to sidewalks, driveways, roadways, and other impervious surfaces which are adjacent to storm drains. Sweep any misplaced granules back onto the area you are treating immediately after application, since storm drains often empty directly to nearby waterways.

POA ANNUA CONTROL IN TURFGRASS

For suppression of *Poa annua* in bentgrass, zoysiagrass, Kentucky bluegrass, and Kentucky bluegrass/perennial ryegrass fairways, tees and roughs, and bentgrass greens. Repeat applications in a programmed approach will result in the gradual elimination of *Poa annua* as a major component of the turfgrass stand. Once the desired level of *Poa annua* is obtained, annual applications and appropriate management practices will help prevent *Poa annua* from reestablishing as a major management problem.

What to expect

The growth and competitive ability of *Poa annua* will be reduced within 1-2 weeks of an application. The shoot and leaf tissue will become discolored (yellow to brown) for 3-8 weeks following the onset of growth regulation. Growth reduction of *Poa annua* will last for at least 3-8 weeks. During this period, growth of bentgrass, zoysiagrass, Kentucky bluegrass, and perennial ryegrass will be stimulated to "crowd out" the weakened *Poa annua*. Creeping bentgrasses will be more effective than Colonial bentgrass varieties in aggressively encroaching *Poa annua* areas. On bentgrass greens, growth reduction of *Poa annua* may last longer than 8 weeks and in some cases *Poa annua* discoloration may not occur during this growth reduction period.

The formation of *Poa annua* seedheads will not be prevented, but spring and previous fall applications will stunt the growth of the seedhead stalk. Applications made just prior to seedhead emergence will greatly reduce the visibility of seedheads for 3-5 weeks.

Regreening/regrowth of *Poa annua* will occur 4-8 weeks after application. Bentgrass, Kentucky bluegrass, and perennial ryegrass color will be enhanced for 6-12 weeks under non-stress conditions.

Stress conditions following application may result in temporary undesirable color changes of bentgrass and Kentucky bluegrass. Avoid these conditions by irrigating and apply at the recommended time.

Treatments will not have any detrimental effects on turfgrass root growth under normal growing conditions and when used as directed.

The degree of *Poa annua* control will be influenced by turfgrass management practices, climate, soil type, bentgrass variety, and *Poa annua* biotype.

Program scheduling

Use any time when *Poa annua* is actively growing. Avoid applications during stressful conditions since the extent of discoloration on *Poa annua* and other desirable grasses may be unacceptable.

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Fairways and roughs: Repeat late summer/early fall followed by spring applications are recommended for gradual *Poa annua* control. Avoid applications during stressful conditions.

Greens and tees: Apply one or two weeks prior to *Poa annua* seedhead emergence to reduce seedhead visibility and encourage bentgrass growth and coverage. Repeat applications can be made under non-stress conditions at least two weeks after *Poa annua* has recovered from any discoloration.

For long-term control in areas containing a high initial percentage of *Poa annua* contamination, repeat applications over a 2 to 3 year period may be required before the desirable grasses predominate.

Moderate soil moisture conditions should be present before and after applications to achieve the best regulating effect (see precautions concerning saturated soil conditions). For best results, avoid applications during extreme soil temperature and moisture conditions.

Spring applications should be delayed until any observable effects from preemergent control applications on bentgrass growth, color and quality have subsided.

Where large areas of the desirable turf have been thinned from winter-damage, disease or insects, withhold application until desired fill-in and rooting of the turf stand is achieved.

Continue normal cultural practices after application. However, do not aerify and topdress greens while *Poa annua* is undergoing growth regulation. Allow aerification treatments to heal before applying product.

When *Poa annua* populations have been reduced to the desired level, annual late summer/early fall applications are recommended where continuous long-term control is desired.

How to use

Apply to dry foliage. For best results, water in (at least ¼ inch) within 48 hours after application.

Adjust the application rate according to the percent of *Poa annua* contamination.

***Poa annua* Contamination Level**

High (50-70%) *Poa annua* population density

Low (less than 50%) *Poa annua* population density

Recommended Application Rate

LOW RATE - 2.22 lb./1,000 sq. ft.
(for less overall discoloration of *Poa annua*)

MEDIUM RATE - 3.33 lb./1,000 sq. ft.
(for quicker removal)

Additional Program Scheduling

Overseeding is recommended to hasten conversion from *Poa annua* to the more desirable grasses. To avoid stunting growth of the desirable seedlings allow at least 2 weeks following treatment before overseeding, and in newly overseeded areas, make treatments at least 6 weeks after overseeding.

If crabgrass or other annual weeds have been a problem in the past, an application of the appropriate preemergent control product should be made before using this product.

If a weed, disease or insect problem occurs after application, apply a recommended control product in the same manner as is normally practiced, since the use of this product is compatible with the existing control products.

If Embark® is used for *Poa annua* seedhead control, apply this product at least 14 days after Embark® use to avoid potential discoloration of bentgrass and Kentucky bluegrass.

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Avoid fall applications during onset of turfgrass dormancy to prevent fall and early spring discoloration of bentgrass and Kentucky bluegrass. Subsequent renewed growth and spring mowings will eliminate this potential discoloration.

Applications made in the fall after the desirable grasses have ceased growing may result in less color response and reduced or delayed activity in affecting *Poa annua* but will provide both a greening response on the desirable grasses as well as growth suppression of *Poa annua* the following spring.

Collecting clippings and the use of lightweight equipment throughout the year will enhance the long-term performance of treatments.

*Embark® is a registered trademark of PBI Gordon Corporation.

PRECAUTIONS

Not for use on hybrid bermudagrass areas or sod farms.

Not for use on athletic fields where excessive wear is expected.

Do not apply to Kentucky bluegrass collars and other areas around greens where consistent turf height and color are desired.

Not for use around shrubs, fruit trees, flowers or vegetable plants; however, applications to turf areas under the tree canopies will not affect or harm trees.

Do not use during periods of extreme environmental stress, such as heat, drought, or cold, or during heavy insect or disease activity.

Frequent irrigation after application throughout hot and dry weather conditions will help prevent potential discoloration of bentgrass and Kentucky bluegrass and ensure continued aggressive growth of the desirable grasses into *Poa annua* areas.

Heavy rainfall or irrigation after application in areas where the soil is already saturated may cause the active ingredient to move laterally on steep slopes and collect in low areas. These areas may undergo more severe growth control for a longer period of time. To avoid this response, **do not** apply when soil is already saturated.

Do not use spreader settings other than those recommended. Improper rates may cause undesirable turf growth control and areas may discolor temporarily.

When large areas of the desirable turf have been thinned from winter damage, disease, or insects, withhold application until desired fill-in and rooting of the turf stand is achieved.

Use in areas containing greater than 70% *Poa annua* will result in more widespread discoloration or the fairway and green and may not appear acceptable to the user. Use of other cultural techniques are encouraged to lower the percentage of *Poa annua* below the 70% level.

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Storage and Disposal

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

PESTICIDE STORAGE: Store in a clean, dry place. Reseal opened bag by folding top down and securing.

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

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Spreader Settings These spreader settings are not intended to replace calibration. Please calibrate your spreader before applying product. XX lbs. treats XX,XXX ft ² at Low rate (2.22 lb./1,000 sq. ft.) XX lbs. treats XX,XXX ft ² at Medium rate (3.33 lb./1,000 sq. ft.)				
SPREADER	GROUND SPEED	WIDTH OF COVERAGE	SPREADER SETTINGS	
			LOW RATE 0.33 lbs. ai/A	MEDIUM RATE 0.50 lbs. ai/A
aa	X mph	XX ft/	X	X
bb	X mph	XX ft	X	X
cc	X mph	XX ft	X	X

Note: This list of spreaders and settings will vary dependent on market availability of spreaders. (this note will not appear on final label)

These spreader settings were established using standard equipment available from the spreader manufacturer at swath widths and speeds typically used within the industry. It is recommended that all spreader equipment be calibrated at the time of application to achieve the desired application rate.

IMPORTANT: READ BEFORE USE:

Read the entire Directions for Use and the Warranty Disclaimer and Limitation of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or Buyer accepts the following Warranty Disclaimer and Limitation of Liability:

WARRANTY DISCLAIMER and LIMITATION of LIABILITY:

Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. Manufacturer makes NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. To the extent consistent with applicable law, it is Manufacturer's intent to LIMIT ANY LIABILITY FOR SPECIAL, CONSEQUENTIAL OR INCIDENTAL ECONOMIC DAMAGES to refund of purchase price or replacement of product, at Buyer's choice. To the extent consistent with applicable law, Manufacturer DISCLAIMS ANY LIABILITY FOR COMPENSATORY OR OTHER DAMAGES ARISING OUT OF ANY USE CONTRARY TO LABEL DIRECTIONS. Use contrary to label directions is not permitted.

LEGAL RIGHTS: THIS LIMITED WARRANTY GIVES YOU SPECIFIC LEGAL RIGHTS; YOU MAY HAVE OTHER RIGHTS THAT VARY FROM STATE/JURISDICTION TO STATE/JURISDICTION.

Manufactured by
The Andersons Lawn Fertilizer Division, Inc.
P.O. Box 119
Maumee, OH 43537

Date Printed	8/10/11
Date Approved	
Supersedes	8/1/05
Label Changes	Amendment – restrict res uses, warranty, etc.
Filename	9198-201
Label Code	RV amd081011