

9688-109

6/20/2002

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

JUN 20 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Glenda L. Mah
Chemsico
United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114-0642

Dear Ms. Mah:

Subject: Conversion from MCPP to MCPP-p
Chemsico Spot Weed Killer A
EPA Registration No. 9688-109
Your Submission Dated May 31, 2002

The Agency is conditionally approving an amendment to the registration for the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy)propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statements of Formula (CSFs) submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to product other than those specified within the body of your certification statement and cover letter dated March 08, 2002. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised CSF (Basic Formulation dated May 30, 2002) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'J. Miller', written over a horizontal line.

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

CHEMSICO

Spot Weed Killer A

[Won't harm lawns • Kills weeds down to the root, not the lawn • Kills 33+ weed-types, roots and all • Kills 66+ types of weeds! • Kills over 60 types of Brush and Weeds • Kills weed roots • Kills the roots • Effective poison oak and ivy killer • Kills the weeds [brushy weeds] [brush], not the lawn • Water-based • Ready-to-Use • See Results in Hours • Overnight Results • Kills all major broadleaf weeds! • Kills poison ivy and poison oak • Also kills blackberries, kudzu and others listed • Can't be washed away [off] by rain • Rain fast in hours • Rainproof in hours • Rain fast – Effective even after rain • Rainproof – For control that won't wash away • Rainproof – Won't wash away • Kills the Weeds – Not the Lawn • *Guaranteed Results Or Your Money Back • GreenThumb® Satisfaction Guarantee]

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

JUN 20 2002

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

Active Ingredients:

*2,4-D, dimethylamine salt	0.593%
†Mecoprop-p, dimethylamine salt	0.144%
‡Dicamba, dimethylamine salt	0.066%
Other Ingredients	99.197%
Total	100.000%

Contains: *0.493% 2,4-D equivalent, †0.119% Mecoprop-p equivalent, ‡0.555% Dicamba equivalent. Contains single isomer form of MCPP-p

KEEP OUT OF REACH OF CHILDREN

CAUTION See back[booklet] for additional precautionary statements

NET CONTENTS 1 GALLON (3.78 L)

OPTIONAL MARKETING LANGUAGE

[Chemsico Spot Weed Killer A kills more than 33 [66] types of [broadleaf] [brushy] [lawn] weeds down to the root. And Chemsico Spot Weed Killer A is formulated to kill only the weeds, not the lawn.]

Chemsico Spot Weed Killer A kills all major [broadleaf] [brushy] [lawn] weeds down to the root. And Chemsico Spot Weed Killer A is formulated to kill only the weeds, not the lawn.]

Use Chemsico Spot Weed Killer A as directed to spot treat [the following types of weeds in your lawn]:

[BROADLEAF WEEDS]

Bedstraw, Black medic, Buckhorn, Canada thistle, Chickweed, Chicory, Clover, Cudweed, Curled dock, Dandelion, Dollarweed, English daisy, Filaree, Fleabane, Ground ivy, Heal-all, Henbit, Knotweed, Lambsquarter, Lespedeza, Matchweed, Morning glory, Mustard, Oxalis, Pennywort, Pepperweed, Pigweed, Plan-tain, Poison ivy, Poison oak, Prickly lettuce, Purslane, Ragweed, Sheep sorrel, Shepherdspurse, Speedwell, Spurge, Wild carrot, Wild garlic, Wild lettuce, Wild onion, Yarrow

(OPTIONAL WEEDS)

[Aster, Bindweed, Bristly oxtongue, Burdock, Carolina geranium, Carpetweed, Cinque foil, Cranesbill, Creeping woodsorrel, Deadnettle, Dog fennel, False dandelion, Hairy bittercress, Hawkweed, Kochia, Pearlwort, Pennycress, Prostrate vervain, Puncturevine, Red sorrel, Scarlet pimpernel, Soliva, Spotted catsear, Spurweed, Wild geranium, Wild violet, Yellow rocket]

OPTIONAL BRUSHY WEEDS

[BRUSHY WEEDS]

[Ash, Birch, Blackberry, Black cherry, Brambles, Cedar, Goose-berry, Hackberry, Kudzu, Lilac, Multiflora rose, Raspberry, Sagebrush, Snowberry, Sumac, Trumpet vine, Virginia creeper, Wild cherry, Wild plum]

[Optional product fact box]

PRODUCT FACTS

What It Does:

[Kills all Major Broadleaf Weeds including Dandelion, Chickweed and Clover] [Kills over 60 types of brush & weeds including Poison Ivy, Poison Oak, Blackberry & Kudzu]

Where To Use: (icon weeds)

Lawns: Kills the Weeds not the Lawn

When To Use:

Do not apply when daytime temperatures are above 85° F as lawn injury can occur

Questions & Comments: (icon phone) (icon computer)

Call 1-800-332-5553 or Visit our Website at www.spectracide.com

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STOP! READ ENTIRE LABEL BEFORE USE.

[Stop. Read all instructions inside before using.

PRESS TO RESEAL]

DIRECTIONS FOR USE

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



Keep people and pets off treated areas until dry.

HAND SPRAYER PRODUCT

(Directions & Storage and Disposal)

1. Shake well.
2. Connect trigger sprayer. Unscrew and discard the white cap on the bottle. Insert the hose into the bottle and tighten the cap securely.
3. Prime Sprayer: Turn the sprayer nozzle one-half turn counter-clockwise. Hold the sprayer lower than the bottle and squeeze the trigger several times until it sprays. Adjust the nozzle to coarse spray pattern to minimize wind drift. (graphic)
4. Spray just enough [Chemsico Spot Weed Killer A] [product] to lightly cover [broadleaf] [brushy] weeds [brush]. **Excessive spraying can injure some lawns.** Do not spray weeds [brush] growing within the dripline of trees. (graphic) Do not apply when daytime temperatures are above 85° F as lawn injury can occur. (graphic) Spray only the weeds [brush], not the entire lawn.
5. Weeds [brush] will begin wilting and browning overnight.

USE TIPS

- Some hard-to-kill weeds [brush] may require re-treatment. Wait at least 3 weeks between applications — some weeds [brush] can take that long to die.
- Rainproof [Rain fast] — rain or watering 6 hours after application will not wash away effectiveness. [If rainfall occurs within 6 hours of application, the product should be reapplied.]
- Do not allow spray to drift onto desirable plants since injury may result.

STORAGE AND DISPOSAL

Storage: Turn the nozzle to "OFF" position and store with sprayer above the level of liquid in container to prevent leakage. Store in original container in a cool, dry area away from heat or open flame and in an area inaccessible to children and pets. Keep from freezing.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for

disposal instructions. Never place unused product down any indoor or outdoor drain.

TRIGGER SPRAYER PRODUCT

(Directions & Storage and Disposal)

1. Shake well.
2. Adjust nozzle to coarse spray pattern to minimize wind drift. (graphic)
3. Spray just enough [Chemsico Spot Weed Killer A] [product] to lightly cover [broadleaf] [brushy] weeds [brush]. **Excessive spraying can injure some lawns.** Do not spray weeds [brush] growing within the dripline of trees. (graphic) Do not apply when daytime temperatures are above 85°F as lawn injury can occur (graphic) Spray only the weeds [brush], not the entire lawn.
4. Weeds [brush] will begin wilting and browning overnight.

STORAGE AND DISPOSAL

Storage: Store in original container in a cool, dry area away from heat or open flame and in an area inaccessible to children and pets. Keep from freezing.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

USE TIPS

- ❖ Some hard-to-kill weeds [brush] may require re-treatment. Wait at least 3 weeks between applications — some weeds [brush] can take that long to die.
- ❖ Rainproof [Rain fast] — rain or watering 6 hours after application will not wash away effectiveness. [If rainfall occurs within 6 hours of application, the product should be re-applied.]
- ❖ Do not allow spray to drift onto desirable plants since injury may result.

**FOR THE POWER PUMP
PRODUCT:
CLAIMS, DIRECTIONS AND**

Patent Pending

[Revolutionary (NEW) Power Pump™ [Spray] • Works like a pressure sprayer • Ready to Pump and Spray • Refillable • Power Pump Pressure Sprayer • Pump & Spray Your Weeds Away • Rest Your Trigger Finger]

Chemsico Spot Weed Killer A kills more than 33 [66] types of [broadleaf] [lawn] [brushy] weeds down to the root. [ALTERNATE: Chemsico Spot Weed Killer A kills all major [broadleaf] [brushy] [lawn] weeds down to the root. And Chemsico Spot Weed

Killer A is formulated to kill only the weeds, not the lawn.] And the revolutionary Power Pump [Spray] eliminates the need to squeeze a trigger sprayer over and over again. The Power Pump [Spray] works like a pressure sprayer - just pump it a few times and spray. And the Power Pump [Spray] can be refilled up to 5 times with Real-Kill® Broadleaf Weed Killer for incredible value!

Use to Spot Treat: Bedstraw, Black medic, Buckhorn, Canada Thistle, Chickweed, Chicory, Clover, Cudweed, Curled dock, Dandelion, Dollarweed, English daisy, Filaree, Fleabane, Ground ivy, Heal-all, Henbit, Knotweed, Lambsquarter, Lespedeza, Matchweed, Morning glory, Mustard, Oxalis, Pennywort, Pepperweed, Pigweed, Plantain, Poison ivy, Poison oak, Prickly lettuce, Purslane, Ragweed, Sheep sorrel, Shepherds-purse, Speedwell, Spurge, Wild carrot, Wild garlic, Wild lettuce, Wild onion, Yarrow and more!

STOP! READ ENTIRE LABEL BEFORE USE

DIRECTIONS FOR USE

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



Keep people and pets off treated areas until dry.

1. **CONNECT WAND HOSE TO POWER PUMP [SPRAY] BOTTLE.** Unwrap the wand. Unscrew and discard the Black Cap on the bottle. Push the Clear Tube down through the small opening on the bottle. (graphic) Tighty screw the Green Hose Connector Cap onto the bottle. (graphic) Make sure the Green Button on the wand is "OFF" or "UP" before pressurizing. (graphic)

2. **PRESSURIZE THE POWER PUMP [SPRAY].** Break off the Pump Handle "TAB" with your thumb. (graphic) Pump 20 - 30 times to build up pressure.

NOTE: The Power Pump [Spray] bottle may bulge slightly as it is pressurized. Never pressurize by any means other than the pump included. You'll need to pump occasionally during use to keep the Power Pump [Spray] pressurized.

3. **SHAKE WELL.** (graphic)

4. **SPRAY [BRUSHY] WEEDS [BRUSH].** Spray just enough [Chemsico Spot Weed Killer] A [product] to lightly cover [broadleaf] [brushy] weeds [brush]. Do not spray weeds [brush] growing within the dripline of trees. (graphic) **Excessive spraying can injure some lawns.**

Just press the Green Button on the wand to spray. If needed, the button can be locked "ON" by pushing it down and forward at the same time. The reverse motion will lock it "OFF." Do not apply when daytime temperatures are above 85° F as lawn injury may occur. (graphic) Spray only the weeds [brush], not the entire lawn.

5. Weeds [brush] will begin wilting and browning overnight.

USE TIPS

- Some hard-to-kill weeds [brush] may require re-treatment. Wait at least 3 weeks between applications — some weeds [brush] can take that long to die.
- Rainproof [Rain fast] — rain or watering 6 hours after application will not wash away effectiveness. [If rainfall occurs within 6 hours of application, the product should be re-applied.]
- Do not allow spray to drift onto desirable plants since injury may result.

REFILLING

The Power Pump [Spray] can be refilled up to 5 times with Real-Kill® Broadleaf Weed Killer. Add 10 oz. of concentrate and dilute to a gallon with water. Use "Fill to Here" mark on the side of the Power Pump [Spray] bottle as a guide. Shake well to mix.

This dilution rate results in a product with the same strength as that supplied in the Power Pump [Spray] when purchased. Make sure the Green Pump Cap and the Green Hose Connector Cap are tightly secured before re-pressurizing. Make sure the Green Button on the wand is "OFF" or "UP" before pressurizing. (graphic) **IMPORTANT: Do not refill more than 5 times.**

To keep track of the number of times refilled, put a mark through the appropriate number: (1) (2) (3) (4) (5-final). Do not use any product other than Real-Kill® Broadleaf Weed Killer in this Power Pump [Spray]. Incompatible chemicals may damage the pump making it unsafe to use.

STORAGE AND DISPOSAL

Storage: Always release pressure by unscrewing the pump cap before storing. Store in original container in a cool, dry area away from heat or open flame and in an area inaccessible to children and pets. Keep from freezing.

Disposal: After 5 refills, rinse thoroughly. **If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

(For All Products)

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. When using this product, wear protective eyewear, long-sleeved shirt, long pants, socks, shoes and rubber gloves. After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. Washing hands thoroughly with soap and water before eating, drinking, chewing gum or using tobacco will reduce exposure. Avoid contamination of food or feedstuffs.

First Aid

If Swallowed: 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 by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person. **If in Eyes:** 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:** 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.

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

Environmental Hazards

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters. Do not contaminate domestic or irrigation waters. Do not apply when weather conditions favor drift from target area.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[*If you are not satisfied with this product for any reason send your written request for a refund to the address below, together with the dated store receipt showing the price you paid. Please allow 6-8 weeks for processing]

[Satisfaction Guaranteed: If for any reason you are not completely satisfied with the performance or results of this GreenThumb® product, it will be repaired or replaced free of charge. Simply provide proof of purchase and return the product and/or unused portion to the place of purchase.]

Questions or comments? Call toll free 1-800-332-5553.

Made in the USA for Chemsico, Division of United Industries Corporation, P.O. Box 142642, St. Louis, MO 63114-0642

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