

9688-192

05/29/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 29 2007

William Metzger
United Industries Corp.
13260 Corporate Exchange Drive
Bridgeton, MO 63044

Dear Mr. Metzger:

Subject: Labeling Amendments - Maximum Application Rate
Chemsico Herbicide Concentrate P
EPA Reg. No. 9688-192
Chemsico Herbicide Concentrate DP
EPA Reg. No. 9688-198
Chemsico Herbicide RTU DP
EPA Reg. No. 9888-218
Your submission dated February 26, 2007

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following changes:

A. For all labels

2. Under "Environmental Hazards";

Add "or rinsate" after "washwaters."

2. Under "Directions for Use";

Specify that the annual maximum application rate is 0.23 lb prometon per 500 ft² or the equivalent area you're using.

3. Under "Storage and Disposal";

Add instructions for container disposal.

B. For Chemsico Herbicide Concentrate P (EPA Reg. No. 9688-192)

3. Under the Heading:

Add a weight of prometon per gallon statement.

4. Under "Directions for Use";

Add the following spray drift management statement:

"Do not allow spray 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."

3. Under "When to Apply";

The maximum application limit for prometon is 0.23 pound per 500 ft² per year. It converts to 0.115 lb per 100 ft², 0.46 lb per 1,000 ft², or 20.04 lbs per acre. Your high application rate is 72 fl. oz. per 100 ft². Assuming the product contains 0.18 lb prometon per gallon, it converts to an application rate of 44.1 lbs of prometon/acre. (72 /128 x 0.18 x 43560 / 100). It has exceeded the maximum application rate of 20.04 lbs per acre. You need to reduce the high application rates within the application limit.

6. Under "Personal Protective Equipment";

Add a section on personal protective equipment with following requirements:

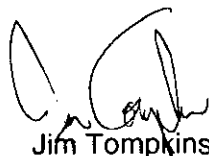
- Long sleeved shirt and long pants.
- Shoes and socks.
- Chemical resistant gloves made of waterproof materials such as butyl rubber, nitrile rubber, or neoprene rubber (≥ 14 mils).

7. Under "Storage and Disposal";

Change "Storage" to "Pesticide storage" and "disposal" to "Pesticide Disposal."

The amended label supersedes all previously accepted labels. A stamped copy of the revised label is enclosed for your records. Please submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,



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

Enclosures

CONCURRENCES

SYMBOL >	7505P	7505P						
SURNAME >	Bien	Tompkins						
DATE >	5-16-07	5-29-07						

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CHEMSICO

Herbicide Concentrate P

[Prevents Plant Growth • [Inhibits] [Prevents] Plant Growth for up to One year • Water-based • Total Vegetation Control • Prevents Plant Growth For up to 1 Year • Keeps Areas Free of Weeds & Grass for Up to 1 Year • Covers up to 800 sq. ft. • Treats up to 800 sq. ft. • No regrowth up to 1 year • Use in driveways, patios, around buildings and under graveled pathways • Use on Patios, Driveways, Sidewalks, Gravel Pathways and Other Listed Sites • Stops Plant Growth....Up to One Year!]

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.

9688-192

MAY 29 2007

Active Ingredient:

Prometon..... 2.2%

Other Ingredients: 97.8%

KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel for additional precautionary statements.

NET CONTENTS 1 GALLON

OPTIONAL MARKETING LANGUAGE

PRODUCT FACT BOX

What it Does: Kills vegetation and prevents plant growth for up to 1 year.

Where to Use: In driveways, sidewalks, paths, patios, parking areas, play areas, along fences and curbs, around buildings and under graveled pathways where plant growth has come through the surfaces.

When to Use: For best results, apply to bare ground when [weed] [vegetation] growth is just starting. Weeds taller than 4-6 inches should be mowed or hoed before treatment.

Questions & Comments: Call 1-800-332-5553 or visit our website at www.zzzzzz.com

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. *For outdoor use around the home only.*



Keep children and animals off treated areas until these areas are dry.

[GENERAL INFORMATION] [HOW TO USE] [THINGS TO KNOW]

Chemsico Herbicide Concentrate P is a nonselective product intended for use after dilution with water and will kill almost all vegetation down to the roots and prevent plant regrowth. When applied to the soil this product can inhibit plant growth for up to one year. Residual control increases as rates are increased.

[USE SITES]

- Use around the home where no plant growth is desired.
- [Chemsico Herbicide Concentrate P is intended] for bare ground vegetation control in driveways, sidewalks, brick walks, paths, patios, parking areas, play

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areas, along fences and curbs, around buildings, and under graveled pathways where plant growth has come through these surfaces.

Do not use on lawns, flowerbeds, or vegetable gardens. Chemsico Herbicide Concentrate P should not be applied over the root zones of desirable trees or shrubs. Do not apply in sloped areas where runoff may adversely affect desirable plants.

For Best Results: Although Chemsico Herbicide Concentrate P has considerable activity through foliar contact, 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. For best results, if the soil is dry, water lightly before treatment. Apply Chemsico Herbicide Concentrate P directly to weeds and grass. Thoroughly wet weeds but do not soak as runoff may occur. Two days following application, lightly water the treated area. This will aid in the killing and prevention of weeds through root absorption.

WHEN TO APPLY

- For best results, apply to bare ground or when weed growth is just starting.
- Weeds taller than 4 inches should be hoed or cut to 1 inch in height before treatment or it may be necessary to make a second application.
- A second application may also be necessary to control deep-rooted perennial weeds. In areas of heavy rainfall, repeat application may be required every six months.

For control of annual and susceptible perennial weeds, use the lower rates listed below. For control of hard-to-kill perennial broadleaf and grass weeds, use the higher rates listed in the table [below].

Area To Be Treated	Lower Rate	Higher rate	Suggested Amt. Of Water to Use
25 sq. ft.	4 fl. oz.	1 pt. 2 fl. oz. (18 fl. oz.)	3 quart
50 sq. ft.	8 fl. oz.	1 qt. 8 fl. oz. (40 fl. oz.)	1 gallon
75 sq. ft.	12 fl. oz.	1 qt. 22 fl. oz. (54 fl. oz.)	1.5 gallon
100 sq. ft.	1 pt. (16 fl. oz.)	2 qt. 8 fl. oz. (72 fl. oz.)	2 gallon

Apply using a sprinkling can or other watering or spraying device in sufficient water to get good coverage of the area (refer to suggested amount of water to use in above table.) When using a sprinkling can, triple rinse and pour rinsewater on area treated once application is complete. Mix only the quantity needed and use immediately. Do not store diluted solution.

IMPORTANT USE PRECAUTIONS:

- To avoid damage to desirable plants, apply when it is not windy. Windy conditions may cause inadvertent drifting to desirable plants and grass.
- DO NOT apply over the root zones of desirable trees and shrubs.
- DO NOT apply to decorative rock or bark groundcovers where the soil is covered with plastic fabric or on slopes because runoff and/or leaching may result (apply only to level surfaces). In heavy clay soil locations, residual activity may exceed one year.
- DO NOT apply closer than twice the distance from the trunk of a tree to the drip line.
- Do not apply next to a fence if desirable plants are growing on the other side or if future plantings are planned.
- Vertically cut through any roots adjacent to root zone of desirable plants.
- It is advisable to wear a long-sleeved shirt, long pants, socks and shoes when applying this product. Wash contaminated clothing after use, separately from other family laundry.

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food, or feed by storage or disposal. Store undiluted pesticide in original container. Do not store diluted pesticide solution. **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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling.

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 do so 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 or Clothing:** 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.

Environmental Hazards

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

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

[Questions or comments? Call 1-800-332-5553]

Made in the USA for
Chemsico, Division of United Industries Corporation
PO Box 142642, St. Louis, Missouri 63114-0642
EPA Reg. No. 9688-192
EPA Est. No.: 9688-MO-1
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