

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

NOV 2 2006

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

William H Metzger Chemsico United Industries Corp. P.O. Box 142642 St. Louis, MO 63114-0642

Dear Mr. Metzger:

Subject:

Revised Labeling

Chemsico Herbicide Concentrate DFC (Alternate II)

EPA File Symbol 9688-206 Chemsico Herbicide RTU DFC EPA File Symbol 9688-208

Your Submissions Dated October 23, 2006

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - Revise marketing claim #71 to read:

Rainfast in 15 minutes.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

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

Sincerely yours,

√Joanne I. Miller

Product Manager (23)

Herbicide Branch

Registration Division (7505P)

vanne J. Miller

Enclosure

Front Panel

Chemsico

Herbicide Concentrate DFC (Alternate II)

See Appendix For Consolidated List of Marketing Claims

ACCEPTED with COMMENTS In EPA Letter Dated:

NOV 2 2006

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

9688-206

Active Ingredients:

2.30%
0.75%
0.51%
96.44%
100.00%]

KEEP OUT OF REACH OF CHILDREN

CAUTION: See {[Back] [Side] [Inside] Panel}, [Booklet] For additional Precautionary Statements, OR [Peel Open for Use Directions and Further Information

NET CONTENTS: 16 fl oz (1 pt / 473 mL); 32 fl oz (1 qt/946 mL)

[OPTIONAL PRODUCT FACT BOX I]

PRODUCT FACTS

Treats up to 900 sq ft [Pint] [Makes up to 3 gallons]
Treats up to 1800 sq ft [Quart] [Makes up to 6 gallons]

KILLS WEEDS (weed icons)
ALL TYPES OF WEEDS AND GRASSES

WHERE TO USE

- On patios, walkways [or] [driveways] [gravel] [mulch beds]
- Around [flowers], shrubs or trees, in flowerbeds
- Along fences and foundations
- In large areas [For ornamental [planting bed] [garden replacement] [For Lawn Replacement]

AMOUNT TO USE

For Best Results: 10 fl oz (20 Tbsp) per gallon of water General Weed Control (annuals): 5 fl oz (6 Tbsp) per gallon of water

Questions & Comments:

(icon telephone) (icon computer)
Call 1-800-332-5553 or visit our website.

[OPTIONAL PRODUCT FACT BOX II]

PRODUCT FACTS

WHAT IT DOES: Kills all types of weeds and grasses [down to the root]

WHERE TO USE: Outdoors [Icon]: On patios, walkways, driveways, flowers, shrubs and [or] trees; along fences and in large areas [for ornamental garden plot preparation] [For Lawn Replacement] WHEN TO USE: For best results, apply during warm, sunny weather (above 60°F)

Questions & Comments:

(icon telephone) (icon computer)

Call 1-800-332-5553 or visit our website.

OPTIONAL MARKETING LANGUAGE

[Chemsico Herbicide Concentrate DFC (Alternate II) eliminates most common weeds, grasses and unwanted vegetation.] [*Illustrations*] [This product can be used [For edging around lawns] [For ornamental [planting bed] garden plot preparation] in driveways, brick and gravel walkways, curbs, along fences and foundations, near trees and shrubs, in flower beds, mulch beds, gravel, and other similar areas of the yard to get rid of undesirable vegetation.] [Chemsico Herbicide Concentrate DFC (Alternate II) can also be used for big jobs such as flower garden preparation] [and lawn replacement [renovation]].

[HOW IT WORKS] [This product [is a non-selective herbicide that] will kill all vegetation contacted. It enters plants through the leaves and moves down to the roots. This will ensure that the entire plant is eliminated. Avoid direct spray or drift onto desirable plants, lawn grasses, shrubs and trees. Protect desirable plants and vegetation with a piece of plastic or cardboard. If desirable plants are accidentally sprayed, wash plants with water immediately. This product has no soil activity and thus will not affect nearby untreated plants.]

[KILLS] [CONTROLS] MOST COMMON [TOUGH] WEEDS AND GRASSES INCLUDING:

[Annual weeds and grasses: Annual ryegrass, annual bluegrass, barnyardgrass, beggarweed, black medic, blue medic, blue toadflax, brassbuttons, blue mustard, bromegrass, bur clover, buttercup, cheeseweed, chickweed, clover, common groundsel, common lambsquarters, common plantain, common ragweed, crabgrass, creeping beggarweed, diffuse lovegrass, dog fennel, evening primrose, false dandelion, fall panicum, fennel, fiddleneck, field pennycress, field sandbur, filaree, Florida pusley, foxtail, garden spurge, goosegrass, green foxtail, hemp sesbania, henbit, horseweed/marestail, ironweed, knotweed, lambsquarters, little bitter cress, London rocket, maiden cane, mallow, mayweed, mouseear chickweed*, oxalis*, Pennsylvania smartweed, pennywort, pigweed, prickly lettuce, prostrate spurge, puncture vine, purslane, redroot, pigweed, sandspur, shepherdspurse, smartweed, smooth cat's ear, smooth pigweed, sowthistle, spotted spurge, sprangletop, spurges, tansy mustard, tansy ragwort, teaweed, Texas panicum, tumble mustard, velvetleaf, wild geranium*, witch grass, wild mustard, yellow nutgrass, yellow oxalis (and many other annual grasses and weeds)]

[Perennial weeds, grasses, brush:

Alder, artichoke thistle, bahiagrass, barnyardgrass, bentgrass, Bermudagrass, bluegrass, broadleaf plantain, brownseed, paspalum, buckhorn plantain, bull thistle, Canada thistle, cattail, ceanothus, centipedegrass, cocklebur, cogongrass, common mullein, common ragweed, coral bead, creeping Charlie, curly dock, dallisgrass, dandelion, dewberry, dog fennel, false dandelion, fescue species, field bindweed, guineagrass, hairy crabgrass, horsenettle, horseradish, iceptant, Johnsongrass, Kentucky bluegrass, kikuyugrass, knapweed, knawel, lantana, maiden cane, milkweed, mouseear chickweed*, nimblewili, nutgrass (nutsedge), oldenlandia,

orchardgrass, oxalis*, pampasgrass, pennywort, perennial ryegrass, plantain, purple cudweed*, purple nutsedge, quackgrass, quaking aspen, ragweed, red clover, smooth bromegrass, sourdock, sowthistle, St. Augustine grass, tall fescue, tansy ragwort, Timothy, torpedograss, trumpetcreeper, vaseygrass, Virginia creeper, white clover, whitetop, wild barley, wild blackberry, wild carrot, wild morning-glory, wild oats, yarrow, yellow nutgrass, yellow starthistle, zoysia.] *annual or perennial

Back Panel

STOP. [Read and follow label instructions] [Read Entire Label Before use] [Lift Here. Press to Reseal]

DIRECTIONS FOR USE

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



Do not allow people or pets to touch treated plants until the sprays have dried.

APPLICATION RESTRICTIONS

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

USER SAFETY RECOMMENDATIONS

Clothing and protective equipment exposed to this product should be washed in detergent and hot water. Such items should be kept and washed separately from other laundry.

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove clothing and protective equipment immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

[This product is formulated for "spot" treatment of individual weeds and grasses or for treatment of large areas as instructed on this label (see specific site areas below).]

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MIXING INSTRUCTIONS

TANK SPRAYER (plastic, aluminum or stainless steel)

- Add appropriate amount of concentrate to one gallon of water
- Spot treat or spray evenly over 300 sq ft

DIAL TYPE HOSE-END SPRAYER

- Set sprayer to the "fl oz/gallon" level specified in the directions
- Use only enough product for the area to be treated.
- · Close sprayer, attach to hose and apply.

CONCENTRATE PLUS WATER [HOSE END] TYPE SPRAYER

- Determine the amount of concentrate required
- Pour concentrate into sprayer jar to the required "fl oz" level
- · Add the required amount of water to the "gals" level.
- Replace sprayer top on jar and apply

[Two Easy Steps to Mix and Apply]

Step #1: Use a clean sprayer. Carefully measure and mix the amount of Chemsico Herbicide Concentrate DFC (Alternate II) (product) and water as directed. Food utensils such as teaspoons and measuring cups should not be used for food purposes after use with pesticides.

Step #2: Spray as directed. Thorough coverage is important. Flush sprayer with clean water after each use,]

AMOUNT TO USE:

For Best Results: 10 fl oz (20 Tbsp) per gallon of water treats 300 sq ft For General Weed Control: 5 fl oz (10 Tbsp) per gallon of water treats 300 sq ft.

1 Tbsp = 3 tsp

1 fl oz = 2 Tbsp

[EZ SPRAY REFILL DIRECTIONS

Refilling the Chemsico Herbicide RTU DFC EZSPRAY: Carefully measure and mix 10 fl oz (20 Tbsp) in one gallon of water. See the EZ SPRAY label for complete directions.]

[HOW TO APPLY]

- Completely [wet] [cover] the foliage [leaves] of the target vegetation [plant]. Do not overspray.
- · A single application controls most [listed] weeds.
- Most treated weeds usually show initial symptoms within 24 hours and complete kill in 1-2 weeks.

- Protect desirable plants with a piece of plastic or cardboard.
- If desirable plants are accidentally sprayed, wash plants with water immediately.
- Do not mow, cut or otherwise disturb treated [vegetation] [weeds] or [plants] for at least 7 days following application.
- Do not use on or around edible feed or food crops.

[WHEN TO APPLY] [USE TIPS]

- For best results apply during warm, sunny weather (above 60° F) when weeds are actively growing and no rain is forecast for 24 hours. Rainfall or watering 2 hours [15 minutes] after application will not wash away effectiveness.
- · To avoid drift to desirable plants, apply when the air is calm.

WHEN TO REPLANT

 All ornamental flowers, trees and shrubs may be planted 1 day after application.

[WHERE TO USE] [USE SITES] [USE SITUATIONS]:

GENERAL WEED CONTROL: Use along [near] fences, paths, patios, sidewalks, curbs and driveways, around ornamental trees, shrubs, flower beds and plantings, around buildings. Use for trimming and edging landscapes. Do NOT use for spot weed treatment in lawns, since Chemsico Herbicide Concentrate DFC (Alternate II) kills all green plants, including lawn grasses.

SPOT TREATMENTS: Spray directly on actively growing weeds in and around flower beds, ornamental trees, shrubs, fences, driveways and walkways.

LANDSCAPES: For use in preparing areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flower beds or similar plantings. Treated areas can be replanted 1 day after treatment.

FOR LAWN RENOVATION/REPLACEMENT: [HOW [ALTERNATE: WHEN] TO USE]

- 1. Determine size of area to be treated—measure length and width in feet then multiply to determine coverage area in sq ft (length x width).
- Use this product to remove [kill] the old lawn and existing weeds and grasses.
- For best results, apply in spring or fall, when daytime temperatures are at least 60° F.
- If the lawn is dry [Under dry conditions], water lawn every other day for a week before applying Chemsico Herbicide Concentrate DFC (Alternate II).
- 5. Do not mow for 7 days before or after treatment.
- Use 10 fl oz (20 Tbs) per gallon of water for each 300 sq ft of area to be treated.



TIPS FOR REPLANTING

- After 7 days, prepare the soil for planting by raking or roto-tilling the lawn. [Wait 7 days after last application to rake, till or replant with seed or sod]
- Rake up and remove loosened thatch or debris.
- · Mix in starter fertilizer and soil amendments, if needed. Level the soil.
- Apply seed according to directions on seed package, or install sod. Grass seed must have good contact with soil to germinate and grow.
- Keep area moist for 2 weeks to establish new lawn, then water as needed.

WILDLIFE AREAS SITE PREPARATION: Use Chemsico Herbicide Concentrate DFC (Alternate II) to prepare areas for planting wildlife food plots. Exotic or undesirable plants can be controlled with Chemsico Herbicide Concentrate DFC (Alternate II) to allow for planting or recovery of native plant species. Spot treatments may be directed to selectively remove unwanted plants. Avoid spray drift to desirable plants. [Be careful to keep spray off desirable plants].

STORAGE AND DISPOSAL

Storage: Store this product only in its original container in a secure storage area away from sources of heat or open flame. Protect product 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.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

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

First Aid

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.

Have the product container or label with you when calling a Poison Control Center, 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.

[*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 original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.]

[Questions? Comments call toll-free 1-800-332-5553 or visit our website]

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

EPA Reg. No. 9688-206

EPA Est. No 9688-MO-1

@2006

CHEMSICO HERBICIDE CONCENTRATE DFC (ALTERNATE II) MARKETING CLAIMS

- 1. *Guaranteed Results [*Or Your Money Back]
- 2. [Better] [Best] Value
- 3. [Formula] Enters The Plant Within One To Two Hours [Won't Wash Off]
- 4. Improved Formula
- 5. [Spot] Treatment For Ornamental Garden] Replanting
- 6. Absorbed Into The Plant
- 7. Absorbed On Contact
- 8. Can Be Used Over The Root Zones Of Trees, Shrubs Or Desirable Plants
- 9. Control That Doesn't Wash Away
- 10. Controls [Hardy] [Tough] [Hard To Kill] Weeds
- 11. Dead [Weeds] [And] [Grass] In 24 Hours
- 12. Dead Weeds Guaranteed* [*Or Your Money Back]
- 13. Does Not Have Soil Activity
- 14. Do-It-Yourself Weed Killer
- 15. Economical Concentrate
- 16. Effective Even If It Rains
- 17. Eliminates [Kills] All Common Weeds And Grasses
- 18. Eliminates Roots & Weeds, [Guaranteed*]
- 19. Eliminates Weeds, [Guaranteed*]
- 20. Exclusive Formula
- 21. Fast & [And] Complete
- 22. Fast Acting [Formula]
- 23. Fast Acting Formula!
- 24. Faster Results Than The Leading Brand
- 25. Fastest Replanting Available
- 26. For Use [Ideal] [Can Be Used] [Use In And Around] [In] [On] [For] [Along] Flower Beds
- 27. For Use [Use] [Ideal] [Can Be Used] [Use In And Around] [In] [On] [For] [Along] [Around] [Fences], [Driveways], [Walkways], [Shrubs], [Trees] [Ornamentals] [Walks] [Mulch Beds] [Gravel] [And] [Driveways] [Curbs]
- 28. For Walks, Drives, Fences, Patios And Similar Areas
- 29. Keeps Working, Even If It Rains
- 30. Kills All Treated Weeds
- 31. Kills [Even] Tough Weeds [And Grasses]
- 32. Kills From The Inside Out
- 33. Kills Over 155 Types Of Weeds [As Listed]
- 34. Kills Over 155 Varieties Of Broadleaf And Grassy Weeds [As Listed]
- 35. Kills The Entire Plant

- 36. Kills The Root So Weeds Won't Grow Back
- 37. Kills The Root!
- 38. Kills The Weed You See And The Root You Don't
- 39. Kills Weeds And Unwanted Grasses
- 40. Kills Weeds And Unwanted Grasses, Roots And All
- 41. Kills Weeds In [A] [One] Day
- 42. No Residual Activity In Soil
- 43. No Root, No Weeds, [Guaranteed]
- 44. No Soil Activity
- 45. No Soil Activity, Must Be Applied To Foliage
- 46. Not Even The Leading Brand [Is Faster] [Is As Fast]
- 47. Overnight Results
- 48. Quick-Kill Formula
- 49. Rainfast In 2 Hours For Control That Doesn't Wash Away [Won't Wash Away]
- 50. Rainfast In Hours Starts To Enter The Plant On Contact
- 51. Rainproof In 2 Hours
- 52. Rainproof In 2 Hours For Control That Won't Wash Away
- 53. Replant Flowers, Trees & Shrubs [In Half The Time Of Other Brands] [The Same Weekend]
- 54. Can Be Used Around Trees & Shrubs
- 55. Satisfaction Guaranteed Or Your Money Back [With Proof Of Purchase]
- 56. See Results In 24 Hrs!
- 57. Starts To Work In 24 Hours
- 58. Starts Working In Hours
- Systemic Weed And Grass Killer For [Spot] Treatment Of Unwanted Weeds And Grasses
- 60. Systemic Formula
- 61. Triple Action [Formula]
- 62. Won't Wash Away
- 63. Works First Time, Every Time,
- 64. Works In 24 Hours
- 65. Works The First Time [Guaranteed*] * Or Your Money Back
- 66. Works 3 Ways: (1)Results in 24 hrs, (2) Kills over 155 varieties of Broadleaf & Grassy Weeds as listed, (3) Kills the Root
- 67. Starts Working Immediately!
- 68. Use on Paved & Landscaped Areas
- 69. Mix with Water
- 70. Visible Results as Fast as 3 Hours
- 71. Rainfast in Minutes