

9688-208

11/21/2006

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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.

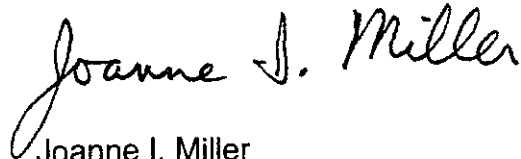
2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

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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 that reads "Joanne I. Miller". The signature is written in a cursive style with a large, looping initial "J".

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

Enclosure

Chemsico Herbicide RTU DFC

[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

9688-208

Active Ingredients:	
Diquat Dibromide.....	0.18%
Fluazifop-p-butyl.....	0.06%
Dicamba, dimethylamine salt.....	0.04%
Other ingredients.....	99.72%
[Total.....	100.00%]

KEEP OUT OF REACH OF CHILDREN

CAUTION See (side)(back) (inside) (panel) (booklet) for additional precautionary statements

Net Contents: 1 Gallon (128 fl oz /3.78L)

OPTIONAL PRODUCT FACT BOX I

Product Facts

Container treats [more than][over] 200 weeds [24 fl oz.]
 Container treats [more than][over] 500 weeds [1/2 gal, 2l] [Container treats 150 sq ft]
 Container treats [more than][over] 1000 weeds [1 gal, 4 L] [Container treats 300 sq ft]
 Container treats [more than][over] 1300 weeds [5L] [Container treats 390 sq ft]
 Container treats [more than][over] 1500 weeds [6L] [Container treats 470 sq ft]
 Container treats [more than][over] 2000 weeds [2 gal] [Container treats 600 sq ft]

KILLS WEEDS

[illustrate grassy, broadleaf and woody weeds]
ALL TYPES OF WEEDS [AND][&] GRASSES

WHERE TO USE:

- On patios, walkways or driveways
- In flower beds
- Around shrubs [and][&] trees
- Along fences [and][&] foundations
- Other areas in your yard
- Edging around lawns
- For ornamental garden plot preparation
- Lawn renovation

Questions & comments:(phone icon) (computer icon)
Call 800-332-5533 or www.(address)

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; around flowers, shrubs and [or] trees; along fences, foundations, 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.

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OPTIONAL MARKETING LANGUAGE

[Chemsico Herbicide RTU DFC eliminates all types of common weeds and grasses [as listed]. *(illustrations)* This product can be used [for] [edging around lawns] [ornamental garden plot preparation] in driveways, walkways, curbs, along fences and foundations, near trees and shrubs, in flower beds, mulch beds and other similar areas of the yard to get rid of undesirable vegetation.]

[This product [is a non-selective herbicide that] will kill any 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.]

[This container covers approximately 300 sq. ft. Coverage may be reduced if large brush species are treated.]

[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, brome grass, 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, shepherdspurge, 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, horsetail, horseradish, iceplant, Johnsongrass, Kentucky bluegrass, kikuyugrass, knapweed, knawel, lantana, maiden cane,

milkweed, mouseear chickweed*, nimblewill, nutgrass (nutsedge), oldenlandia, orchardgrass, oxalis*, pampasgrass, pennywort, perennial ryegrass, plantain, purple cudweed*, purple nutsedge, quackgrass, quaking aspen, ragweed red clover, smooth brome grass, sourdock, sowthistle, St Augustine grass, tall fescue, tansy ragwort, Timothy, torpedograss, trumpet creeper, vane grass, 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

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 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.

[How to use] [Application Instructions]

Chemsico Herbicide RTU DFC is pre-mixed and ready to use and is formulated for "spot" treatment of weeds and grasses. [It is ideal for tough to reach weeds found in flowerbeds.] Use it on driveways and walkways, or around fences, trees, flower beds, shrubs and other areas in your yard. [It can also be used for lawn renovation.]

[How To Apply]

- Completely [wet] [cover] the foliage [leaves] of the target vegetation [plant]. Do not overspray.
- Sprayed plants begin yellowing and wilting in about 24 hrs, with complete kill, including the roots, in 1 to 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.

Not recommended for spot weed treatment in established lawns since lawn grasses will also be killed.

[OPTIONAL EDGER TEXT]

Chemsico Herbicide RTU DFC is an easy edger for use along driveways, walkways, curbs, sidewalk cracks, around landscaping, ornamentals, trees, and shrubs. Use in larger areas such as patios and brick and gravel walks. [This product treats 1200 linear feet (3 inch wide band)]

[SPRINKLER CAP APPLICATOR]

1. Remove cap from applicator head and make sure that the applicator head is screwed firmly on the bottle.
2. Hold the bottle about 2 to 6 inches from the area to be treated. Invert the bottle and apply product to thoroughly cover unwanted vegetation. The width of the stream may be adjusted by either raising or lowering the bottle.
3. Use just enough product to completely [cover] [wet] the [vegetation] [plant].

[OPTION A: Hand Sprayer Application]

How to prime and care for your sprayer:

1. CONNECT TRIGGER SPRAYER. Unscrew and discard the [white] cap on the bottle. Insert the hose into the bottle and tighten the cap securely.
2. 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. Avoid sprays which are too fine because they can drift and damage other plants.
3. Spray unwanted grass & weeds until completely [covered] [wet].

[OPTION B: Trigger Sprayer applicator]

1. Turn nozzle to coarse spray pattern. Avoid sprays which are too fine because they can drift and damage other plants.
2. Spray unwanted grass & weeds until completely [covered] [wet].



[WHEN TO REPLANT]

- All ornamental flowers, trees and (&) shrubs may be planted 1 day after application.

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).
2. Use this product to remove [kill] the old lawn and existing weeds and grasses.
3. For best results, apply in spring or fall, when daytime temperatures are at least 60°F.
4. If the lawn is dry [Under dry conditions], water lawn every other day for a week before applying Chemsico Herbicide RTU DFC
5. Do not mow for 7 days before or after treatment.
6. One gallon treats 300 sq ft.

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.

STORAGE AND DISPOSAL**[OPTION A: Hand Sprayer Applicator**

Storage: Turn the nozzle to "OFF" position and store with sprayer above the level of liquid in container to prevent leakage. **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.

[OPTION B: Trigger Sprayer and Sprinkler Cap]

Storage: Store in a cool, dry area away from heat or open flame. **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 eyes, skin 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 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

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.

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

[Questions or Comments? call 1-800-332-5553]

EPA Reg. No. 9688-208

EPA Est. No. 9688-MO-1

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ALTERNATE LABEL FORMAT

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 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

[Hand Sprayer Application]

How to prime and care for your sprayer:

1. CONNECT TRIGGER SPRAYER. Unscrew and discard the [white] cap on the bottle. Insert the hose into the bottle and tighten the cap securely.
2. 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. Avoid sprays which are too fine because they can drift and damage other plants.
3. Spray unwanted grass & weeds until completely [covered] [wet].

[EZSPRAY™ Directions]

1. [Unwrap sprayer.] Remove sprayer from side holder. Gently pull tubing out. (Graphical representation.)
2. Remove seal from top of cap. Unplug cap. (Graphical representation.)

3. Securely snap the [yellow] plug into hole on cap. (Graphical representation.)
4. Remove plastic tab near bottom of sprayer to activate batteries. (Graphical representation.)
5. Twist nozzle to adjust spray from CLOSE to SPRAY to STRFAM. (Graphical representation.)

HOW TO USE THE EzSpray™

1. Aim toward target weeds/plants, and away from people and pets.
2. Press the trigger to spray.
3. Release the trigger to stop spray.

After use: 1. Twist nozzle completely to CLOSE position. 2. Secure sprayer upright in holder. 3. **Failure to adjust nozzle completely to CLOSE position and properly secure sprayer in holder may result in leakage and damage to property or injury to people or animals.**

To replace batteries: 1. Slide battery compartment door to unlatch and open. 2. Remove used batteries and insert four new AA batteries **in correct positions** as marked per diagram inside of battery compartment. Never insert the positive end where the negative end belongs and vice versa. **Always** use a complete set of new batteries the same type when replacing batteries. **Never** mix alkaline, carbon-zinc or rechargeable batteries. 3. Securely close battery compartment door. 4. **Always** follow manufacturer's recommendations for use and disposal of batteries.

Additional Operating Notes: Do not submerge in water. Before each use inspect sprayer carefully, make sure hose is flexible and not kinked, worn or cracked, and that all connections are tight. When storing sprayer for prolonged periods remove batteries.

[How to use] [Application Instructions] [When To Use]

Chemsico Herbicide RTU DFC is pre-mixed and ready to use and is formulated for "spot" treatment of weeds and grasses. [It is ideal for tough to reach weeds found in flowerbeds.] Use it on driveways and walkways, or around fences, trees, flower beds, shrubs and other areas in your yard. [It can also be used for lawn renovation.]

[How To Apply] [Alt: General Weed Control]

- Completely [wet] [cover] the foliage [leaves] of the target vegetation [plant]. Do not overspray.
- Sprayed plants begin yellowing and wilting in about 24 hrs, with complete kill, including the roots, in 1 to 2 weeks.
- Protect desirable plants with a piece of plastic or cardboard.
- If desirable plants are accidentally sprayed, wash plants with water immediately.

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- 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] [General 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.

Not recommended for spot weed treatment in established lawns since lawn grasses will also be killed.

[When To Replant]

All ornamental flowers, trees and (&) shrubs may be planted **1 day** after application.

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

- 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 RTU DFC
- Do not mow for 7 days before or after treatment.
- One gallon treats 300 sq ft.

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

REFILL DIRECTIONS

Refill only with Spectracide TripleStrike Grass & Weed Killer Concentrate. Remove cap. Carefully measure and mix 10 fl oz (20 Tbsp) in one gallon of water. Replace and tightly close cap. Wipe off any spilled product.

STORAGE AND DISPOSAL**[Hand Sprayer Applicator]**

Storage: Turn the nozzle to "OFF" position and store with sprayer above the level of liquid in container to prevent leakage. **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.

[EZSPRAY Sprayer]

Storage: Turn the nozzle to "CLOSE" position. To prevent leakage, attach sprayer to clip. 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 except to refill (see Refill Directions). 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.

CHEMSICO HERBICIDE RTU DFC 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 and Grasses
11. Dead [weeds] [and] [grass] in 24 hours [and they'll never come back]
12. Dead Weeds Guaranteed* [*Or Your Money Back]
13. Does not have soil activity
14. Do-it-yourself weed killer
15. Effective even if it rains
16. Eliminates [kills] all common weeds and grasses
17. Eliminates Roots & Weeds, [Guaranteed*]
18. Eliminates Weeds, [Guaranteed*]
19. Exclusive Formula
20. Fast & [and] complete
21. Fast Acting [Formula]
22. Faster results than the leading brand
23. Fastest Replanting Available
24. For [Spot] Treatment of Unwanted Weeds and Grasses
25. For use [Ideal] [Can be Used] [Use in and around] [in] [on] [for] [along] flowerbeds
26. 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]
27. For walks, drives, fences, patios and similar areas
28. Keeps Working, Even If it Rains
29. Kills All Treated Weeds
30. Kills Even Tough Weeds & Grasses
31. Kills from the Inside Out
32. Kills over 155 types of weeds [as listed]
33. Kills over 155 varieties of broadleaf and grassy weeds [as listed]
34. Kills the Entire Plant
35. Kills the Root
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 Measuring
43. No Mixing [Required] [Necessary]
44. No residual activity in soil
45. No Root, No Weeds, [Guaranteed]
46. No Soil Activity
47. Not even the leading brand [is faster] [is as fast]
48. Overnight results
49. Quick-Kill Formula
50. Rainfast in 2 hours for control that doesn't wash away [won't wash away]
51. Rainfast in Hours – Starts to enter the Plant on Contact
52. Rainproof in 2 hours
53. Rainproof in 2 Hours for Control That Won't Wash Away
54. Ready-To-Use
55. Replant flowers, trees & shrubs [in half the time of other brands] [the same weekend]
56. Can be used around trees & shrubs
57. Satisfaction guaranteed [or your money back] [with proof of purchase]
58. See Results in 24 hrs!
59. Starts to work in 24 hours
60. Starts Working in Hours
61. Systemic formula
62. Systemic Weed and Grass Killer
63. Triple Action Formula
64. Water-based
65. Won't Wash Away
66. Works First Time, [Every time]
67. Works in 24 hours
- Works the first time [guaranteed*] * Or Your Money Back
68. Works 3 Ways : (1)Results in 24 hrs, (2) Kills over 155 varieties of Broadleaf & Grassy Weeds as listed, (3) Kills the Root
69. Starts Working Immediately !
70. Use on Paved & Landscaped Areas
71. Visible Results as Fast as 3 Hours
72. Rainfast in Minutes