

9754-4

05/25/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 25 2007

Larry Mackson
Sungro Chemicals, Inc.
P.O. Box 24632
Los Angeles, CA 90024

Dear Mr. Mackson:

Subject: Labeling Amendments - Maximum Application Rate
Weed-Go Non-Select Weed and Grass Killer
EPA Reg. No. 9754-4
Weed-Go II
EPA Reg. No. 11474-79
Kleen-Weed
EPA Reg. No. 11474-87
Your submission dated February 16, 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:

1. Under "Heading";

The weight statement is defined as weight per unit volume of product, i.e., pound of active ingredient per gallon product. Make this change for all labels.

2. Under "Environmental Hazards";

Add "or rinsate" after "washwaters."

3. Under "General Information";

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

4. Under "Directions for Use";

Remove "such as" and provide specific species of weeds that these product control.

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5. Under "Conditions for Sales and Warranty";

Add "*To the fullest extent permitted by law*" before "Seller makes no other . . . or implied warranty" and "In no case . . . form the use or handling of this product."

5. Under "Kleen-Weed";

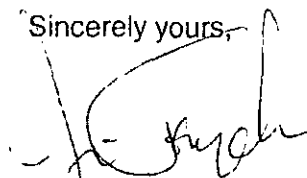
The maximum application limit for prometon is 0.23 pound per 500 ft² per year. It converts to 0.115 lb per 100 ft², 0.46 lb per 1,000 ft², or 20.04 lbs per acre. Based on a bulk density of 7.27 lbs per gallon specified in your CSF for this product, each gallon of liquid would contain 0.109 lb of prometon. The label states that for control of hard-to-kill perennial broadleaf and grass weeds, the higher application rate is 6.7 to 9.2 pints product per 100 ft². This converts to an application rate of 39.6 lbs of prometon ($6.7 / 8 \times 0.109 \times 43560 / 100$). It has exceeded the maximum application rate of 20.04 lbs per acre. You need to revise the low and high application rates within the application limit.

6. Under "Weed-Go II";

Based on a bulk density of 7.27 lbs per gallon specified in your CSF for this product, each gallon of liquid would contain 0.273 lb. of prometon. The label states that for control of hard-to-kill perennial broadleaf and grass weeds, the higher application rate is 1.3 to 1.8 qts product per 100 ft². This converts to an application rate of 38.6 lbs of prometon ($1.3 / 4 \times 0.273 \times 43560 / 100$) for the low rate of 1.3 qts per 100 ft². It has exceeded the maximum application rate of 20.04 lbs per acre. You need to revise the low and high application rates within the application limit.

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

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC
ANIMALS
CAUTION**

Causes eye and skin irritation. Do not get in eyes, on skin or clothing. Harmful if swallowed. Do not breathe vapor or spray mist. Use waterproof gloves and face shield or goggles when handling concentrate. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Birds and wildlife in treated areas may be killed. Do not apply directly to any body of water. Do not apply where runoff is likely to occur. Do not contaminate water used for irrigation or domestic purposes.

Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

WEED-GO is a non-selective herbicide with fast acting double killing action. It kills by contact and by root absorption. It is recommended for killing existing weeds and grasses, and to prevent regrowth on walks, paths, driveways, blacktop and gravel areas, and playgrounds, and for creating firebreaks around structures in potential fire areas.

The following are a few of the common weeds and other vegetation that can be controlled or killed and regrowth prevented with WEED-GO: oxalis, crabgrass, Bermuda grass, rye, oats, barley, foxtail, dog fennel, plantain, spotted spurge, pigweed, puncture vine, mustard, watergrass, green ground mold, malva, wild turnip, lamb's-quarters, and such hard to kill perennial weeds as hoary cress, dandelion and wild morning glory, also woody plants such as poison oak, honeysuckle and blackberry.

MIXING AND USING AS A SPRAY:

Measure the required amount of WEED-GO directly into the sprayer or sprinkling can and then add the needed quantity of water and stir thoroughly. The mixed spray tends to separate on standing and therefore should be gently agitated from time to time while it is being applied. Use 1 gallon of WEED-GO to 8 gallons of water and apply to 1000 sq.ft. for the control of heavy brush, deep rooted perennials, woody plants and tall weeds.

WEED-GO

NON-SELECT WEED AND GRASS KILLER

**NON-SELECTIVE FOR USE ON NON-CROP
AREAS SUCH AS INDUSTRIAL SITES,
FENCE ROWS, STORAGE AREAS,
PARKING LOTS.**

Active Ingredients: Prometon (2,4-bis(isopropylamino)-6-methoxy-5-triazine)
Inert Ingredients: Total
By Weight: 4.00%
96.00%
100.00%

CONTAINS PETROLEUM DISTILLATES

CAUTION

KEEP OUT OF REACH OF CHILDREN
(SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS)

E.P.A. EST. NO. 11474CA01 E.P.A. REG. NO. 9754-4

Seller guarantees that this material conforms to the chemical description on the label, and is effective for the purpose claimed when used in accordance with label instructions. The buyer assumes all risks and responsibility for use and /or handling of this product when such use and /or handling is not in accordance with label instructions. No other warranty expressed or implied is authorized by the seller.

Manufactured by:
Gro-Lyfe, a Division of
SUNGRO CHEMICALS, INC.
P.O. BOX 24632
LOS ANGELES, CA. 90024

NET CONTENTS GALLONS (LITERS)

For the existing annual weeds and grasses, use 1 gallon of WEED-GO to 12 gallons of water and apply to 1500 sq.ft. The root action on deep-rooted perennials and some woody plants requires applied moisture or rain to get the active ingredients to the root zone.

Two days after applying WEED-GO, water the treated area deeply to increase plant absorption. One day treatment normally provides control for a full season. Repeat application if necessary. For longer lasting control double the rate of application.

SPOT TREATMENT: For woody plants such as poison oak, honeysuckle, blackberry, and Bermuda grass on driveways, patios and parking lots apply at the rate of 1 gallon of WEED-GO mixed with 8 gallons of water. Spray all exposed parts and saturate the soil around the base. Follow with deep watering. Use a tank sprayer or sprinkling can.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

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.

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 9-1-1 or an ambulance then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Questions? 1-800-463-9179 or call poison control center.

NOTE TO PHYSICIAN:
Contains petroleum distillates vomiting may cause aspiration pneumonia. If gastric lavage is deemed necessary, undertake only after proper placement of a cuffed endotracheal tube.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store container, tightly closed, away from greenhouse, seeds, plants, fertilizers and water supplies. Protect from freezing. Do not contaminate water, food or feed by storage or disposal.

CONTAINER 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 for disposal instructions. Never place unused product down any indoor or outdoor drain. 041403lam060903fpl

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 9754-4

In EPA Letter Dated