



04-17-2008

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

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OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

APR 17 2008

Mr. Adam Swader  
Regulatory Compliance Specialist  
ATHEA Laboratories, Inc.  
P.O. Box 240014  
Milwaukee, WI 53224

Dear Mr. Swader

Subject: Non-Selective Weed Killer Concentrate  
Label Amendment  
EPA Registration No. 10088-118  
Submission Dated: February 15, 2008

The labeling referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide act, as amended is acceptable provided you:

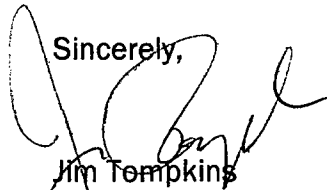
1. Under the heading Application Restrictions, revise to read as follows:

Do not apply more than 109 gallons of this product per year from all applications.

2. Change all occurrences of 109 ½ to 109 as requested in an Agency registration letter dated April 26, 2007.
3. On page three of the labeling delete 109 ½ from the 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs.

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

Sincerely,



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

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

**CAUTION**

Harmful if swallowed. Causes moderate eye irritation. Do not get on skin or clothing. Avoid contact with eyes, skin or clothing.

**FIRST AID**

**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.

**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. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to by poison control center or doctor.

**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 further treatment advice.

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

This product may cause skin sensitization reactions in some people.

You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

**Applicators and other handlers must wear:** Chemical-resistant gloves made of any water-proof material, long sleeved shirt and long pants, shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS**

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes. Keep out of lakes, streams or ponds. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Avoid contamination of feed and foodstuff. Store in a dry area. Keep inner liner closed when not in use. Do not store near food, feed, seed or fertilizer.

**PESTICIDE DISPOSAL:** Open dumping is prohibited. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse container then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**NON-SELECTIVE  
WEED KILLER  
CONCENTRATE**

NON-SELECTIVE HERBICIDE FOR CONTROLLING A  
WIDE RANGE OF ANNUAL AND PERENNIAL WEEDS  
AND GRASSES ON NON-CROPLAND AREAS

**ACTIVE INGREDIENTS**

Lithium salt of Bromacil

(5-bromo-3-sec-butyl-6-methyluracil)..... 1.20%

**INERT INGREDIENTS**..... 98.80%

**TOTAL**..... 100.00%

This product contains lithium salt of bromacil at 0.11 pounds per gallon.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See side panel for additional precautionary statements.

EPA Reg. No. 10088-118

EPA Est. No. 10088-WI-1

Sold By:

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

**APR 17 2008**

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

*10088-118*

**DIRECTIONS FOR USE**

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

**GENERAL PRECAUTIONS AND RESTRICTIONS**

**Entry Restrictions:** Do not enter or allow others to enter the treated area until sprays have dried.

**Application Restrictions:**

Do not apply more than the maximum application which 12 lbs.

Do not apply this product in such a way that it will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Not to be used in any recreational areas or in or around homes.

Do not use aluminum spray nozzles. Do not apply when the ground is frozen. Do not apply, drain or flush equipment on or near valuable trees or other desirable plants or on areas where their roots may extend, or where the chemical may be washed or moved into contact with their roots. Do not use on lawns, walks, driveways, tennis courts or similar areas. Prevent spray drift to desirable plants. **NOTE:** For effective brush control and to prevent damage to desirable vegetation; do not apply to brush in standing water; do not use on rights-of-way or other sites where desirable trees or shrubs are immediately adjacent to the treated areas. Do not use along ditch banks.

This product is an effective total kill herbicide for use on non-crop areas for control of many annual and perennial weeds and grasses. The degrees of control and duration of effect will vary with the amount of product applied, soil type, rainfall and other conditions.

Apply this product just before or during the period of active growth of plants to be controlled and when rainfall can be expected for soil activation. Because it works through the soil, results will be improved by removing dense vegetation growth before treatment. Effects are slow to appear and may not become apparent until the chemical has been carried into the root zone by moisture.

**WEED CONTROL:** To control most weeds for an extended period of time on non-cropland areas such as railroad, highway and pipeline rights-of-way, tank farms, lumber yards, fencerows, parking lots, storage areas and industrial sites.

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**NET CONTENTS:**

☐ 1 ☐ 5 ☐ 6 ☐ 20 ☐ 30 ☐ 55

**GALLONS**

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Words in *italics* are for reference only.  
Words in [ ] are alternative wording.  
Words in { } are optional wording.

**Directions for Use continued**

**The following applies to Option 1, 2 or 3**

Dilute 1 gallon of Non-Selective Weed Killer Concentrate {this product} with 9[10] gallons of water (total of 10 [11] gallons). This will assist in getting the product to the root zone. This solutions may be applied by sprinkling or spraying. If sprayed, direct spray toward the base of the weed and adjust {nozzle} for a coarse spray to prevent drift.

**Option 1**

Annual weeds and grasses: Such as foxtail, ryegrass, wild oats, crabgrass, broomgrass, cheatgrass, ragweed, lambsquarters, puncturevine, orchardgrass, and turkey mullein. Apply 10 [11] gallons of diluted product per 800 square feet [ft<sup>2</sup>] {54-½ gallons/[per] acre}.

Perennial weeds and grasses: Such as smooth brome, bahiagrass, bluegrass, purpletop, quackgrass, broomsedge, dogs fennel, aster, goldenrod, plantain, dandelion, and wild carrot. Apply 10 [11] gallons of diluted product per 400 square feet [ft<sup>2</sup>] {109-½ gallons/ [per] acre}.

Hard to kill perennials: Such as johnsongrass, nutgrass bermudagrass, dalligrass, nutsedge, saltgrass, bouncingbet, bracken, fern, dogbane and horsetail. Apply 10 [11] gallons of diluted product per 400 square feet [ft<sup>2</sup>] {109-½ gallons/ [per] acre}. Where limited rainfall (usually less than 4 inches) occurs during the active growing period, such as some areas of the west, this product will not provide satisfactory control of hard-to-kill, deep rooted perennial weeds such as johnsongrass. Use the higher application rates on absorptive soils (usually those high in organic matter or carbon).

Re-treatment: Apply 10 [11] gallons of the diluted product per 800 square feet when annual weeds and grasses reappear.

**Option 2**

Annual weeds and grasses: Such as foxtail, ryegrass, wild oats, crabgrass, broomgrass, cheatgrass, ragweed, lambsquarters, puncturevine, orchardgrass, and turkey mullein. Apply 10 [11] gallons of diluted product per 800 to 3100 square feet [ft<sup>2</sup>] {13-½ to 54-½ gallons/[per] acre}.

Perennial weeds and grasses: Such as smooth brome, bahiagrass, bluegrass, purpletop, quackgrass, broomsedge, dogs fennel, aster, goldenrod, plantain, dandelion, and wild carrot. Apply 10 [11] gallons of diluted product per 400 to 800 square feet [ft<sup>2</sup>] {54-½ to 109-½ gallons/ [per] acre}.

Hard to kill perennials: Such as johnsongrass, nutgrass bermudagrass, dalligrass, nutsedge, saltgrass, bouncingbet, bracken, fern, dogbane and horsetail. Apply 10 [11] gallons of diluted product per 400 to 800 square feet [ft<sup>2</sup>] {54-½ to 109-½ gallons/ [per] acre}. Where limited rainfall (usually less than 4 inches) occurs during the active growing period, such as some areas of the west, this product will not provide satisfactory control of hard-to-kill, deep rooted perennial weeds such as johnsongrass. Use the higher application rates on absorptive soils (usually those high in organic matter or carbon).

Re-treatment: Apply 10 [11] gallons of the diluted product per 800 square feet when annual weeds and grasses reappear.

Words in italics are for reference only  
Words in [ ] are alternative wording  
Words in { } are optional wording

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### Option 3

Annual weeds and grasses: Such as foxtail, ryegrass, wild oats, crabgrass, broomgrass, cheatgrass, ragweed, lambsquarters, puncturevine, orchardgrass, and turkey mullein. Apply 10 [11] gallons of diluted product over an area of 3100 square feet [ft<sup>2</sup>] {13-½ to 54-½ gallons/[per] acre}.

Perennial weeds and grasses: Such as smooth brome, bahiagrass, bluegrass, purpletop, quackgrass, broomsedge, dogs fennel, aster, goldenrod, plantain, dandelion, and wild carrot. Apply 10 [11] gallons of diluted product over an area over 800 square feet [ft<sup>2</sup>] {54-½ to 109-½ gallons/[per] acre}.

Hard to kill perennials: Such as johnsongrass, nutgrass bermudagrass, dalligrass, nutsedge, saltgrass, bouncingbet, bracken, fern, dogbane and horsetail. Apply 10 [11] gallons of diluted product over an area of 800 square feet [ft<sup>2</sup>] {54-½ to 109-½ gallons/[per] acre}. Where limited rainfall (usually less than 4 inches) occurs during the active growing period, such as some areas of the west, this product will not provide satisfactory control of hard-to-kill, deep rooted perennial weeds such as johnsongrass. Use the higher application rates on absorptive soils (usually those high in organic matter or carbon).

Re-treatment: Apply 10 [11] gallons of the diluted product per 800 square feet when annual weeds and grasses reappear.

### Option 4

To control annual weeds and grasses such as foxtail, ryegrass, wild oats, crabgrass, broomgrass, cheatgrass, ragweed, lambsquarters, puncturevine, orchardgrass, and turkey mullein: Apply 13-½ to 54-½ gallons [of this product] per acre diluted with sufficient water to allow for uniform application. {For small areas,} use 40 ounces in about 4 gallons of water to treat 250 square feet [ft<sup>2</sup>].

To control perennial weeds and grasses such as smooth brome, bahiagrass, bluegrass, purpletop, quackgrass, broomsedge, dogs fennel, aster, goldenrod, plantain, dandelion, and wild carrot: Apply 54-½ to 109-½ gallons [of this product] per acre diluted with sufficient water to allow for uniform application. {For small areas,} use 80 ounces in about 4 gallons of water to treat 250 square feet [ft<sup>2</sup>].

To control hard to kill perennials such as johnsongrass, nutgrass bermudagrass, dalligrass, nutsedge, saltgrass, bouncingbet, bracken, fern, dogbane and horsetail: Apply 54-½ to 109-½ gallons [of this product] per acre diluted with sufficient water to allow for uniform application. Where limited rainfall (usually less than 4 inches) occurs during the active growing period, such as some areas of the west, this product will not provide satisfactory control of hard-to-kill, deep rooted perennial weeds such as johnsongrass. Use the higher application rates on absorptive soils (usually those high in organic matter or carbon).

For re-treatment on sites where weed growth has been controlled, apply 12 to 26-½ gallons per acre.

NO 109 ½ 109 only MAX

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