

10404-44

3-28-2003

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 10404-44	2. EPA Product Manager Joanne Miller	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) LESCO Bentgrass Selective Broadleaf Herbicide	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) LESCO, Inc. 15885 Sprague Rd. Strongsville, Ohio 44138 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**NOTIFICATION**  
MAR 28 2003

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Per Joanne Miller (3/14/03), this label modification is being submitted as a notification. California Department of Pesticide Regulation noted that LESCO needs to add to the First Aid box: "Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage". Attached is California's letter and the new label.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes" Unit Packaging wgt.      No. per container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Package wgt	No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Gloria M. Sieloff	Title Director, Regulatory Affairs	Telephone No. (include Area Code) 440-783-9250 ext. 2597
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  (Stamped)
2. Signature 	3. Title Director, Regulatory Affairs	
4. Typed Name Gloria M. Sieloff	5. Date 3/18/03	

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# LESCO Bentgrass Selective Broadleaf Herbicide

NOT FOR USE on turf being grown for sale or other commercial use as sod,  
or for commercial seed production, or for research purposes.

For Use On Ornamental Lawns and Turfgrasses  
(such as residential and commercial sites, athletic fields, parks, and recreational areas)  
(Contains 0.19 pounds Dicamba; 0.73 pounds MECOPROP-p and 0.49 pounds 2,4-D per Gallon)

ACTIVE INGREDIENTS:	
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-anisic Acid)*	2.64%
Dimethylamine Salt of Related Compound	0.67%
Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid**	6.61%
Dimethylamine Salt of (+)-R-(2-methyl-4-Chlorophenoxy)propionic acid*** ‡	9.97%
INERT INGREDIENT	80.11%
<b>TOTAL</b>	<b>100.00%</b>

(Isomer Specific Method by AOAC 14th Edition #6.321)

\* Equivalent to 2.19% or 0.19 lbs. of (3,6-dichloro-o-anisic) acid per gallon

\*\* Equivalent to 5.49% or 0.49 lbs. of 2,4-Dichlorophenoxyacetic acid per gallon

\*\*\* ‡ Equivalent to 8.24% or 0.73 lbs. of (+)-R-(2-methyl-4-chlorophenoxy) propionic acid per gallon

‡ CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p

NOTIFICATION  
MAR 28 2003

UCC 00758073 69333 8

### KEEP OUT OF REACH OF CHILDREN DANGER - PELIGRO

\*PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente\*

#### FIRST AID

<b>If in eyes</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>Call a Poison Control Center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferable mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

#### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Chem-Trec 1-800-424-4300 for emergency medical treatment.

SEE INSIDE FOR ADDITIONAL PRECAUTIONARY STATEMENTS

#069333

NET CONTENTS 2.5 GAL. (9.45 L)

TM

F1406

Distributed by LESCO, Inc. • 15885 Sprague Road • Strongsville, OH 44136-1772

Rev. 02/03

EPA REG. NO. 10404-44

EPA EST. NO. 10404-OH-02; 228-IL-1 (two letters)

First letter(s) of lot number indicates manufacturing site.

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**IMPORTANT USE PRECAUTIONS:** Avoid drift of spray (coarse sprays are less likely to drift) onto vegetables, flowers, ornamentals, shrubs, trees, and other desirable crop plants. Do not contaminate domestic or irrigations waters. Do not pour solution used to clean sprayer near desirable plants or where it may contaminate water. Use of this product on newly established bentgrass may result in undesirable injury. Use of this product on "Older" bentgrass varieties may result in undesirable turf injury.

**DIRECTIONS FOR USE**

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

**CHEMIGATION:** Do not apply this product through any type of irrigation system.

When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from susceptible plants, wells and other water sources. The maximum number of broadcast applications per treatment site is 2 per year.

**APPLICATION RATES  
HOW AND WHEN TO USE**

**Bentgrass Lawns and Turf** - Apply as a spot application with a hand held sprayer or to large areas with a suitable power "boom-type" sprayer using 1 to 1.45 fluid ounces in 1 to 3 gallons of water per 1,000 sq. ft. (equivalent to 3 to 4 pints per acre). Apply as a foliar spray during growing season. Spray works faster when temperatures are over 65-70° F and weeds are young and actively growing. To avoid spray particle drift adjust spray nozzles as close to turf as practical, spraying only when calm or wind is less than 5 mph. If hardy weeds persist, make a second application after three weeks. This rate, which provides 1/4 pound of 2,4-D acid equivalent per acre per application per site, is the maximum legal application rate for turf.

Maximum kill of weeds will be obtained from spring or early fall application when weeds are actively growing. Avoid spraying during long excessively dry or hot periods unless adequate irrigation is available. If application is made when soil is quite warm, use the lower rate to reduce potential injury.

Do not irrigate within 24 hours of application. Weeds that start growing in the fall, such as henbit, may be controlled more effectively if sprayed at that time. If dandelions persist as a special problem, individual spot treatment with a hand sprayer is recommended.

Do not over-dose Bentgrass. In closely mowed Bentgrass (putting and bowling greens) apply **LESCO Bentgrass Selective Broadleaf Herbicide** at a maximum rate of 1 fluid ounce per 1,000 sq. ft. preferably in May through September. Any yellowing will disappear after about one week. This rate, which provides 1/8 pound of 2,4-D acid equivalent per acre per application per site, is the maximum legal application rate for turf.

In addition to Bentgrass, this product will control weeds in varieties of Bluegrass, Rye, Fescue, Bermuda and Zoysia grass. Apply using 1.45 to 2.2 fl. oz./1,000 sq. ft. (equivalent to 4 to 6 pints per acre). Hard-to-kill summer weeds may require up to 6 pints of this product per acre; however, do not apply this rate to Bentgrass. This rate, which provides 3/8 pound of 2,4-D acid equivalent per acre per application per site, is the maximum legal application for turf. For weed control in St. Augustinegrass and Centipedegrass, use only the low rate (1-1.45 fl. oz. per 1,000 sq. ft.). Some temporary injury or discoloration should be expected following application.

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**WEEDS CONTROLLED**

Bedstraw	Ground Ivy	Peppergrass	Smartweed
Black Medic	Heal-All	Pigweed	Speedwell
Buckhorn	Henbit	Plantain	Spurge
Burdock	Knotweed	Poison Ivy	Wild Carrot
Chickweed	Lamsquarter	Poison Oak	Wild Garlic
Chicory	Lespedeza	Purslane	Wild Onion
Clover	Mallow	Ragweed	Yarrow
Dandelion	Morningglory	Sheep Sorrel	(and many more broadleaf weeds)
Docks	Oxalis	Shepherd's Purse	

(Less than 5 Gallons): Persons engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron.

(Sizes 5 Gallons and Larger): A mechanical system (such as a probe and pump) must be used for transferring the contents to the container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

**SEEDING**

Do not apply to newly seeded turf until after the second or third mowing. Seed can be safely sown 3 to 4 weeks after application at recommended rates. A good rain or deep watering should occur before seeding.

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

**DANGER:** Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin or clothing.

**When using this product (non-commercial users AND commercial mixer/loader/applicators when applying on golf courses):** wear long-sleeved shirt, long pants, socks, shoes, rubber gloves, and eye protection. It is recommended that safety glasses include front, brow, and temple protection.

**When using this product (commercial mixer/loader/applicators or homeowner when applying to places other than golf courses):** When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves, and eye protection. It is recommended that safety glasses include front, brow, and temple protection.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. Avoid contamination of foodstuffs. Wash hands after use and before eating or smoking.

**RE-ENTRY AND WORKER SAFETY STATEMENT**

Do not allow people (other than the applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

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**ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

**Groundwater Contamination:** Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D herbicides and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling pesticide at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

**IMPORTANT:** Do not use on carpetgrass or dichondra, nor on lawns or turf where desirable clovers are present. Some injury can be expected to turf when used on centipedegrass or St. Augustingrass lawns.

**STORAGE AND DISPOSAL  
Residential**

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

**Storage:** Store product in original labeled container in a cool, dry, locked place out of reach of children. Store in a separate area for herbicides. Store above 32° F.

**If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**If empty:** Do not reuse the container. Place in trash or offer for recycling if available.

**STORAGE AND DISPOSAL  
Commercial**

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

**Storage:** Store product in original labeled container in a cool, dry, locked place out of reach of children. Store in a separate area for herbicides. Store above 32° F.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**NOTICE**

LESCO, Inc. warrants that this herbicide conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this herbicide is reasonably fit for its intended purposes. Since timing, method of application, weather, plant and soil conditions, mixture with other chemicals, and other factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

LESCO is a registered trademark and the Sweeping Design is a trademark of LESCO Technologies, LLC.  
Rev. 02/19/03 WNH

(013103)



# Department of Pesticide Regulation



Gray Davis  
Governor

Winston H. Hickox  
Secretary, California  
Environmental  
Protection Agency

Paul E. Helliker  
Director

February 6, 2003, 2003

ID # 195669



Ms. Terri Simon  
Regulatory Specialist  
Lesco, Inc.  
15885 Sprague Rd.  
Strongsville, Ohio 44136-1799

Dear Ms. Simon:

**Lesco Bentgrass Selective Broadleaf Herbicide, EPA Reg. No. 10404-44;  
SUBMISSION DEFICIENT**

Your submission entered the scientific evaluation process. However, certain deficiencies have been identified; the enclosed report explains the items that must be submitted to complete your application. You should submit these items as soon as possible.

We will continue our evaluation of the remaining data in your submission and notify you of any other deficiencies upon completion of our review. If we do not receive these items, we will issue a notice proposing denial of registration after completion of our evaluation. At the end of the 30-day notice period, a final decision will be made. If registration is denied, you will be notified.

When responding, please refer to the ID# in the upper right hand corner of this letter.

Sincerely,

Fely R. Frank  
Senior Pesticide Use Specialist  
Pesticide Registration Branch  
(916) 324-3523  
E-Mail: ffrank@cdpr.ca.gov

Enclosure

**FLEX YOUR POWER!** The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web site at <[www.cdpr.ca.gov](http://www.cdpr.ca.gov)>.



1001 I Street • P.O. Box 4015 • Sacramento, California 95812-4015 • [www.cdpr.ca.gov](http://www.cdpr.ca.gov)

A Department of the California Environmental Protection Agency



# Department of Pesticide Regulation



Paul E. Helliker  
Director

## MEMORANDUM

Gray Davis  
Governor  
Winston H. Hickox  
Secretary, California  
Environmental  
Protection Agency

TO: Felicidad Frank, Pesticide Use Specialist  
FROM: Worker Health and Safety Branch  
DATE: January 27, 2003  
SUBJECT: PESTICIDE PRODUCT LABEL EVALUATION



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PRODUCT NAME : Lesco Bentgrass Selective Broadleaf Herbicide  
ACTIVE INGREDIENT(S) : 1. Dimethylamine of 2,4-Dichlorophenoxyacetic acid, 2. Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid, and 3. Dimethylamine salt of Dicamba (3,6-dichloro-o-anisic acid).  
I.D. NUMBER : 195669  
DOCUMENT NUMBER : NA  
EPA REGISTRATION NO. : 10404-44  
COMPANY NAME : Lesco, Inc.

REGISTRATION TYPE: Section 3

LABEL AMENDMENT: Yes  No

JUSTIFICATION/ADDITIONAL DATA REQUIRED: Yes  No

PROPOSED REGISTRATION ACTION: ~~Do Not Recommend Registration~~

U.S. EPA RED ISSUED FOR THIS

### SUMMARY OF REGISTRATION REQUEST

The Lesco, Inc has requested a Section 3 registration for a product, Lesco Bentgrass selective broadleaf herbicide with active ingredients, Dimethylamine of 2,4-Dichlorophenoxyacetic acid, Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy) propionic acid, and Dimethylamine salt of Dicamba (3,6-dichloro-o-anisic acid). It is intended to be used for the control of various broadleaf weeds on ornamental lawns and turfgrasses. The product is currently registered with the U.S. EPA (Reg. No. 10404-44). The product is labeled for homeowners' uses only. It has no intended agricultural uses and hence is not subject to Worker Protection Standard label requirements.

The Medical Toxicology Branch has reviewed the package, and provided acute toxicity categories of a product, Riverdale triplet selective herbicide, which is suitable for bridging with



Felicidad Frank  
ID No. :195669  
January 27, 2003  
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the current product. Riverdale Chemical Company has authorized the Department of Pesticide Regulation to reference any data previously submitted by Riverdale Chemical Company in support of Lesco, Inc's application for registration of the subject product. The acute toxicity categories for this bridging product are III for oral and dermal, IV for inhalation and primary dermal irritation, and I for primary eye irritation. The product is not identified as a potential dermal sensitizer. The Medical Toxicology Branch recommends registration of the product. The Registration Eligibility Decision (RED) of this product is available.

The Registration Branch has requested that the WH&S Branch review the registration package to determine whether the data and label statements support Section 3 registration and to evaluate the label for worker exposure concerns.

**BASIS FOR PROPOSED ACTION:**

The proposed product label is not consistent with current Worker Health and Safety guidelines regarding statements associated with pesticide exposure and safety.

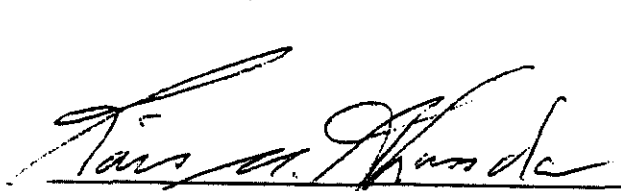
Pesticide Registration (PR) Notice 2001-1 states that a "Note to Physician" must be included on the label for all products in toxicity category I, and any product which is corrosive or classified as toxicity category I for eye or skin. The present product is classified as toxicity category I for signal word, and primary eye irritation. The present proposed label does not comply with all of the PR Notice 2001-1 requirements.

**ADDITIONAL COMMENTS:**

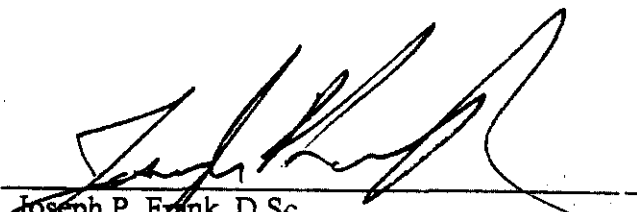
Need to add a "Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage". *(under "First Aid" box)*

**REFERENCES:**

N/A



Rais U. Akanda, Ph.D.  
(Associate Environmental Research Scientist)



Joseph P. Frank, D.Sc.  
(Senior Toxicologist)