



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

APR 26 1991

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Mr. Harold B. Igdaloff
Sungro Chemical, Inc.
P.O. Box 24632
Los Angeles, CA 90024

Dear Mr. Igdaloff:

Subject: Revised Confidential Statement of Formula (CSF)
and Product Label in response to EPA letter
dated October 25, 1990
Over Grass and Weed Killer
EPA Registration No. 11474-13
Your submission dated November 2, 1990

This letter is in reference to your submission dated November 2, 1990 in which you submitted a revised CSF dated 11/5/90 and product label. The Agency has completed its review and has the following comments:

- (a) The revised CSF for alternate formulation agrees with the label claim, however, the upper and lower certified limits for the active components should bracket (i.e., be higher and lower, respectively) the active ingredient label claim of your finished product. The Agency acknowledges the label claim for sodium cacodylate to be 9.36%.
- (b) Since the label claim has been changed from 9.27% to 9.36%, you should revise the CSF for the basic formulation so that the nominal concentrations of the active ingredients are the same as the label claim.

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The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. At the next label revision, the terms "INGREDIENTS" and "INERT INGREDIENTS" should be in the same type size and be equally prominent. A stamped copy is enclosed for your records. Please submit three (3) copies of final printed labeling incorporating the above comment(s).

Sincerely yours,

Joanne I. Miller

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

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

CAUTION: Harmful if swallowed. Avoid contact with skin. Avoid breathing spray mist. Wash hands after using. Avoid storage near feed or food products. Keep children and domestic animals off treated areas until material is washed into soil. ANTIDOTE: If taken internally, induce vomiting and call a physician at once.

ENVIRONMENTAL HAZARDS

Do not contaminate waters used for domestic consumption or by animals, wildlife and aquatic life or for irrigation purposes. Do not apply OVER directly, or allow to come to contact with foliage, green bark, grafted unions or scuffed, damaged or broken bark on trees and ornamentals.

STORAGE AND DISPOSAL

STORAGE: Keep from freezing. If this product is stored in cold or freezing weather it may separate and thicken. This will not hamper the performance. Before using, warm to room temperature and stir thoroughly.

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

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. 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 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.

OVER

**GRASS AND WEED KILLER
NON-RESIDUAL ALLOWS REPLANTING
IN ONLY 5 DAYS**

ACTIVE INGREDIENTS:

Sodium Cacodylate

Dimethylarsinic Acid (Cacodylic Acid)

Inert Ingredients:

TOTAL

% By Weight

9.36%

1.60%

89.04%

100.0%

Total Arsenic (as elemental) all in water soluble form 5.20%

CAUTION

KEEP OUT OF REACH OF CHILDREN

(See Side Panel for Additional Precautionary Statements)

Seller makes no warranty, expressed or implied as to merchantability, fitness for a particular purpose, or otherwise concerning the use of this product, other than as indicated on the label. Seller shall not be liable for any injury, damage or loss resulting from handling, storage or use of this product not in strict accordance with the directions given herein.

EPA Reg. No. 11474-13

E.P.A. Est. No. 11474CA01

MANUFACTURED BY:
SUNGRO CHEMICALS, INC.
P.O. BOX 24632 LOS ANGELES, CA 90024

ACCEPTED
with COMMENTS
in EPA Letter Dated:

April 26, 1991

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

11474-13

DIRECT

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product to a system.

Lawn areas should be mowed before application for best results. FOR LARGE AREAS: Apply one gallon of OVER in five square feet of area. Thoroughly wetting foliage. Withhold watering for 48 hours. SPOT TREATMENT: Use one convenient container (tablespoons) in 1 quart of water to treat an area (5'x8'). Then withhold watering for three to seven days. Bermudagrass may require a repeat application approximately five days after the first application and seed at the recommended rate. For control of a wide variety of weeds on walkways, driveways or ornamental shrubs, OVER is especially effective. replanting is desired. It is safe for lawns. OVER provides quick control of weeds. Brome, Bur Clover, Chicory, Glory, Oxalis, and Wild Onion. Grass, Bluegrass, Clover, Dandelion, Quackgrass, Plantain and

NET CONTENTS

BEST AVAILABLE