

11474-79

05/25/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAY 25 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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.

Page 2

EPA Reg. Nos. 9754-4, 11474-79, 11474-87

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";

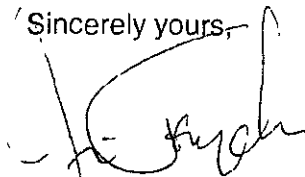
The maximum application limit for prometon is 0.23 pound per 500 ft² per year. It converts to 0.115 lb per 100 ft², 0.46 lb per 1,000 ft², or 20.04 lbs per acre. Based on a bulk density of 7.27 lbs per gallon specified in your CSF for this product, each gallon of liquid would contain 0.109 lb of prometon. 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
WARNING**

Causes substantial but temporary eye injury. Do not get in eyes. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin or clothing. Avoid breathing vapor or spray mist. Wear chemical goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill, or store near heat or open flame.

ENVIRONMENTAL HAZARDS

Do not use on slopes or in areas where runoff is likely to occur (apply only to level surfaces). Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment waste water. Apply this product only as specified on this label.

GENERAL INFORMATION

For total weed control on certain areas around the home, the business, or workplace where no plant growth is desired, use as specified in label directions. Controls bindweed, common mullein, and other hard-to-kill weeds.

Prevents plant growth for up to one year.

WEED-GO II Liquid Vegetation Killer is a nonselective product intended for use after dilution with water or an appropriate oil, or other approved carrier. For best results apply to bare ground or when weed growth is just starting. Weeds taller than 4-6 inches should be hoed before treatment or it may be necessary to make a second application. A second application may be necessary to control deep-rooted perennial weeds.

Use for bare ground vegetation control in driveways, brick walks, paths, patios, parking areas, play areas, along fences and curbs, around buildings, and under traveled pathways where plant growth has come through these surfaces.

DIRECTIONS FOR USE

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

For control of annual and susceptible perennial weeds such as downy brome grass, oatgrass, goosegrass, quackgrass, puncturevine, goldenrod, and plantain. To cover 100 sq. ft., add 10 - 16 fl. oz. by use of a sprinkling can or other watering or spraying device in sufficient water to get good coverage of the area (e.g., 2 1/2 gals. in sprinkling can).

For control of hard-to-kill perennial broadleaf and grass weeds such as bindweed and johnsongrass as well as the biennials common mullein and wild carrot, use 1 1/3 - 1.8 qts. in sufficient water to get good coverage.

WEED-GO II

LIQUID VEGETATION KILLER

**FOR TOTAL VEGETATION CONTROL.
PREVENTS PLANT GROWTH FOR UP
TO ONE YEAR.
ONE GALLON COVERS UP TO 1200
SQUARE FEET**

ACTIVE INGREDIENT	% By Weight
Prometon: 2,4-bis(isopropylamino)- 6-methoxy-s-triazine	3.75
INERT INGREDIENTS	96.25
TOTAL	100.00

*Contains petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN
WARNING**

(SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS)

E.P.A. EST. NO. 11474CA01

E.P.A. REG. NO. 11474-79

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.

Different grades of mineral oil, diesel fuel, petroleum-based oil, fuel oil, or kerosene may be substituted for water.

When using sprinkling can, triple rinse and pour rinsate on area treated once application is completed. Mix only the quantity needed and use immediately. Do not store dilute solution once container is opened. To minimize lateral movement, sprinkle lightly with a watering can or similar sprinkler device immediately after application.

PRECAUTIONS: (1) Apply when air is calm to avoid the possibility of drift onto desirable plants or grass. (2) Keep away from the roots of desirable plants and trees. (3) Use only in areas where complete control of all vegetation is desired. (4) WEED-GO II LIQUID VEGETATION KILLER MAY NOT BE USED ON CULTIVATED AREAS, ON GROUND THAT IS TO BE CULTIVATED, IN GREENHOUSES, OR NEAR THE DRIP LINE OF TREES OR SHRUBS, TO AREAS CULTIVATED OR TO BE CULTIVATED, AREAS GRAZED OR TO BE GRAZED BY LIVESTOCK. (5) Do not use on slopes or in areas where runoff is likely to occur (apply only to level surfaces). (6) Avoid using where adjacent desirable trees, shrubs, or plants may be injured from leaching of the chemical through the soil. (7) Keep children and animals off treated areas until these areas are dry.

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.

CONDITIONS OF SALES AND WARRANTY

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product.

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequence may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of Seller. All such risks shall be assumed by the Buyer.

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to above. Seller makes no other expressed or implied warranty of Fitness or Merchantability or any other expressed or implied warranty. In no case shall Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. Seller offers this product, and the Buyer and user accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of Seller.

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MAY 25 2007

Manufactured by:
SUNGRO CHEMICALS, INC.
P.O. BOX 24632 LOS ANGELES, CA. 90024

NET CONTENT _____ GALS. (LITERS)

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended for the pesticide
registered under EPA Reg. No.
11474-79

ACCEPTED
with COMMENTS
in EPA Letter Dated