34911-19 8/7/2000 Page 136



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

AUG 7 2002

Marla K. Jackson Agent for Hi-Yield® Chemical Company Brazos Associates, Inc.® 2001 Diamond Ridge Drive Carrollton, Texas 75010-4509

Dear Ms. Jackson:

Subject:

Hi-Yield® Liquid Edger EPA Reg. No. 34911-19

Re: Label Amendments

Your submission dated May 1, 2002

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable, provided you make the following changes:

- 1. Reposition the "PRECAUTIONARY STATEMENTS," "FIRST AID BOX," and "ENVIRONMENTAL HAZARDS" sections of the label (page 3) so that they precede the "DIRECTIONS FOR USE" section of the label (page 2). These sections must appear on the label in the specific order designated above.
- 2. Reorder the sequence of the **FIRST AID** statements within the box (page 3 of the label) to give precedence to the more severe routes of exposure as demonstrated by the toxicity category classification; the Registrant must move the "If inhaled..." first aid statements to the end of the list so that they appear after the "If in eyes..." first aid statements.
- 3. Replace the paragraph under the subheading "ENVIRONMENTAL HAZARDS" (page 3 of the label) so that it reads as follows:
 - "Do not apply directly to water. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposing of equipment washwaters or rinsate."
- 4. Add the word "PESTICIDE" to the STORAGE AND DISPOSAL section of the label so that the first subheading begins with: "PESTICIDE STORAGE" rather than "STORAGE."
- 5. Add the word "CONTAINER" to the STORAGE AND DISPOSAL section of the label so that the second subheading begins with: "CONTAINER DISPOSAL" rather than "DISPOSAL."

Further, the Registrant is required to fill out a new Confidential Statement of Formula (CSF) form for their subject product, Hi-Yield® Liquid Edger, so that it reflects the correct product number (EPA Reg. No. 39511-19). The current CSF form (located under Topics, Registration Form 8570-4) may be obtained from the following Agency website: http\\www.epa.gov/pesticides.

Please submit two (2) copies of your final printed labels incorporating these changes before releasing your product for shipment. A stamped copy is enclosed for your records.

If you have any questions or concerns, please contact me at (703) 305-5697 or the product team reviewer Michelle Centra at (703) 308-2476.

Sincerely,

James A. Tompkins

Product Manager Team (25)

Herbicide Branch

Registration Division (7505C)

[FRONT LABEL PANEL]

Under the Federal Insecticide, Fundicide, and Redunistic Act as amended, for the posteride registered under EPA Reg. No. 349//-/9

Hi-Yield®

[Pouring Diagram]

Improved

[Pouring Diagram]

Liquid Edger

- May be Used Right In and Around Desired Plants
- The Easy Way to Kill Grass and Weeds
- Convenient Applicator Top
- Ready to Use for Fences, Walks, Driveways, Patios, Parking Lots, Around Trees and Shrubs

ACTIVE INGREDIENTS:

Sodium Cacodylate	00.6%
Dimethylarsinic Acid (Cacodylic Acid)	00.1%
INERT INGREDIENTS:	<u>99.3%</u>
TOTAL:	100.00%

Total Arsenic (as elemental) all in water soluble form - 0.33%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back/Side Label Panel for Additional Precautionary Statements

N	ρt	Contents	
13	CL	Comenia	

[BACK/SIDE LABEL PANEL]

DIRECTIONS FOR USE

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

HI-YIELD® Improved LIQUID EDGER is a ready-to-use, non-selective, non-hormone, non-violate, non-flammable grass and weed killer with convenient applicator top. This takes much of the work out of edging around fences, sidewalks, driveways, curbs, flower beds, trees, shrubs and other similar areas. HI-YIELD® Improved LIQUID EDGER will not sterilize soil when used according to directions.

Shake well before use. Remove protective cap from jug. Screw applicator head on jug, being certain applicator head is screwed firmly on jug. Invert jug. Thoroughly wet foliage and stems of undesired vegetation. The width of the spray pattern may be adjusted by either raising or lowering the jug. Replace protective cap on applicator head for storage.

For best results apply during periods of high temperatures and humidity. Retreatment may be necessary if regrowth occurs.

For edging around lawns, fences, sidewalks, curbs and similar areas, hold jug about 2 to 6 inches from the surface of the grass depending on the desired width. One gallon of HI-YIELD® Improved LIQUID EDGER used in this manner should treat a strip 2 inches wide and approximately 2000 feet in length. Under warm sunny conditions wilting will occur in 1 to 3 days and complete browning in 5 to 7 days.

For treating larger areas such as vacant lots or similar areas where weed control is desired, hold jug at waist height away from body to avoid contact with skin or clothing and walk slowly, making sure that all undesirable plants are thoroughly covered with spray. Apply 1 gallon to cover 200 square feet. For spot treating weeds, hold jug so that spray hits only the weeds or area to be treated.

IMPORTANT: To avoid drift that may injure desirable plants, do not apply during windy weather. Do not apply directly to or allow this product to come into contact with leaves, green bark, bud crowns or broken bark on trees and ornamentals. Do not track from treated areas to untreated areas.

STORAGE AND DISPOSAL

STORAGE: Store in original container. Keep in an area inaccessible to children and pets. 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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[BACK/SIDE LABEL PANEL]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash hands after using. Keep children and domestic animals off treated areas until this material has been washed into the soil. Avoid contamination of feed or foodstuffs. Do not contaminate water used for irrigation or domestic purposes.

FIRST AID Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 or 1-800-900-4044 for emergency medical treatment information.			
If swallowed	 Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. 		
If inhaled	 Move person to fresh air. If person is not breathing, call 911 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. 		
If on skin or clothing	 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 eye. Call a poison control center or doctor for treatment advice. 		

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith. Hi-Yield® Chemical Company warrants this product to conform to the chemical description on the label and for the purposes stated on the label. The limit of any liability incurred shall be the purchase price paid by the user or buyer.

[BACK/SIDE LABEL PANEL]

HI-YIELD® CHEMICAL COMPANY P.O. BOX 460 BONHAM, TX 75418

> EPA Reg. No. 34911-19 EPA Est. No. 7401-TX-1

REVISED: 04/09/02

S:\Main\Voluntary Purchasing Groups\Labels\Hi-Yield Liquid Edger