

53883-62

2/28/2003

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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 53883 - 62	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Surrender brand Eraser 18% Systemic Weed & Grass Killer	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <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 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

FEB 28 2003

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

Notification of Optional Marketing statements per PR Notice 98-10. See attached labeling for highlighted statements. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

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	Metal Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	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"/> on label	
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 Joe Blake	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 800-242-5562
Certification 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 both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Director, Regulatory Affairs	
4. Typed Name Joe Blake	5. Date 02-13-03	

Surrender® brand

ERASER 18%

Systemic Weed and Grass Killer

- 18% CONCENTRATE [optional marketing statement]
- CONTAINS GLYPHOSATE [optional marketing statement]
- GRASS, WEED AND VEGETATION HERBICIDE (KILLER) [optional marketing statement]
- This product is a nonselective herbicide that is diluted and applied to the foliage of actively growing weeds as a spot or broadcast application. It is absorbed by the leaves and moves throughout the stem and roots to control the entire plant. [optional marketing statement]
- Visible symptoms may require a week or more to appear, with burndown usually occurring in 2 to 4 weeks. Symptoms are a gradual wilting and yellowing of the sprayed plant followed by deterioration of both shoots and roots. This product has no herbicidal activity in the soil and will not wash or leach to affect nearby vegetation. [optional marketing statement]
- This product controls many weeds around buildings, vacant lots, storage and recreational areas, gravel or ground bark mulch, shade trees, ornamentals and shrubs, along fences, sidewalks, driveways and patios; and prior to planting turfgrasses or shrubs listed on the label. When used as a spot treatment in lawns, all vegetation contacted will be damaged. [optional marketing statement]
- Where to use: around buildings, sidewalks, recreational areas, driveways and patios, vacant lots [optional marketing statement]
- Mixing rates: Use 3 oz. per gallon of water for most annual weeds, Use 6 oz. per gallon of water for most perennial weeds. [optional marketing statement]

ACTIVE INGREDIENT:

Glyphosate, N-(phosphonomethyl) glycine, in the form of its isopropylamine salt* 18.00%

INERT INGREDIENTS:..... 82.00%

TOTAL.....100.00%

**Keep Out Of Reach of Children
Caution**

See back panel (or inside booklet/pamphlet) for additional precautionary statements

NET CONTENTS _____

FEB 28 2003

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
KEEP OUT OF REACH OF CHILDREN**

CAUTION

Harmful if swallowed. May cause eye irritation. Avoid contact with skin, eyes or clothing.

FIRST AID

IF IN EYES: Immediately flush with plenty of water. Call a physician if irritation persists. Remove product from skin or clothing.

IF SWALLOWED: This product will cause gastrointestinal tract irritation. Immediately dilute by swallowing water or milk. Call a physician.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: 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.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Mix, store or apply this product only in stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

- This product is a nonselective herbicide that is diluted and applied to the foliage of actively growing weeds as a spot or broadcast application. It is absorbed by the leaves and moves throughout the stem and roots to control the entire plant. Visible symptoms may require a week or more to appear, with burndown usually occurring in 2 to 4 weeks. Symptoms are a gradual wilting and yellowing of the sprayed plant followed by deterioration of both shoots and roots. This product has no herbicidal activity in the soil and will not wash or leach to affect nearby vegetation.
- This product controls many weeds around buildings, vacant lots, storage and

recreational areas, gravel or ground bark mulch, shade trees, ornamentals and shrubs, along fences, sidewalks, driveways and patios; and prior to planting turfgrasses or shrubs listed on the label. When used as a spot treatment in lawns, all vegetation contacted will be damaged.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes, or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

THIS PRODUCT CAN INJURE OR DESTROY ALL VEGETATION CONTACTED. AVOID SPRAY DRIFT CONTACT WITH DESIRABLE LAWN GRASSES, FLOWERS, VEGETABLES, SHRUBS OR TREES. DO NOT CONTACT GREEN BARK OF TREES OR SHRUBS. IF DESIRABLE VEGETATION IS CONTACTED, WASH IMMEDIATELY WITH WATER.

WEEDS CONTROLLED

When applied as recommended under the conditions described, this product controls many common weeds including the following:

ANNUALS: Barnyardgrass, Bluegrass (annual), Chickweed, Crabgrass, Foxtail, Lambsquarter (common), Lettuce (prickly), Mustard (tansy), Pennycress (field), Pigweed (redroot, smooth), Ragweed (common), Ryegrass (annual), Sandbur (field), Shepherdspurse, Sowthistle.

PERENNIALS: Bahiagrass, Bermudagrass, Bindweed (field), Bluegrass (Kentucky), Fescue (tall), Johnsongrass, Nutsedge (purple, yellow), Orchardgrass, Bromegrass (smooth), Clover (red, white), Dallisgrass, Dandelion, Fescue species, Quackgrass, Ryegrass (perennial), Thistle (Canada), Timothy, Vaseygrass.

BRUSH: Alder, Blackberry, Cherry, Dewberry, Elderberry, Honeysuckle, Kudzu, Oak, Poison Ivy, Poison Oak, Raspberry, Rose (multiflora), Sumac, Trumpet creeper, Willow.

WHEN TO APPLY

Apply to vigorously growing plants. Apply to annual weeds at any time after emergence. For best results apply to perennial weeds after seedheads, flowers, or berries appear. On woody brush or trees, apply after leaves have fully expanded. Applications made at less than the recommended stage of growth may result in reduced control. After mowing, clipping or tilling, allow weeds to regrow to the recommended growth stage before spraying this product. Rainfall or watering within 6 hours after application can wash the product off plant foliage which may require retreatment. Delay mowing, clipping, tilling, planting or sodding of treated areas for at least 7 day after application. This allows time for this product to move within the plant for most effective results. SINCE THIS PRODUCT DOES NOT WORK IN SOIL, RETREATMENTS WILL BE NECESSARY TO CONTROL NEW WEEDS EMERGING FROM SEED.

One application will control most weeds listed. Symptoms on certain tough perennial weeds and woody brush and tree species may be slow to develop. If control is not achieved within 4 weeks, allow time for the sprayed weeds to regrow and make a repeat application.

In some cases, control of woody brush and trees treated in the fall may not be fully apparent until the following season.

LAWN RENOVATION

Best results are obtained when at least one mowing is skipped prior to treatment. This provides more leaf surface to intercept the spray. For areas where renovation and reseeding is desired, thorough spray coverage of all existing vegetation is necessary. Delay planting or sodding of treated areas for at least 7 days after application.

ORNAMENTALS

Any ornamental species may be planted in treated areas 7 days or more after application. Apply this product as recommended to control undesirable plants. To avoid injury on desirable plants, prevent spray or drift contact with foliage, stems or green bark. Do not spray into or over the top of growing ornamentals.

HAND-HELD SPRAYERS

Add 3 to 6 fluid ounces (6 to 12 tbsp.) of this product to 1 gallon of clean water. Use the higher recommended rate for control of listed perennials and brush. Use pump-up-type or hand-trigger-type sprayers. USE OF HOSE-END SPRAYERS OR SPRINKLER-TYPE DEVICES MAY RESULT IN POOR AND/OR ERRATIC RESULTS.

CLEANING EQUIPMENT

Triple-rinse spray tank and flush all sprayer components with water to remove residues of this product. After thorough cleaning, equipment may be used to apply other products. ****Ensure uniform and complete spray coverage, but do not spray plants to the point that the spray solution runs off. Use a coarse spray. Do not spray during windy conditions, as spray drift may cause damage to any vegetation contacted.

STORAGE AND DISPOSAL

Do not contaminate water, foodstuffs, feed or seed by storage or disposal.

STORAGE: Store this product in its original container and in a secured storage area.

DISPOSAL: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures. Emptied container retains vapor and product residue. Observe all labeled safeguards until container is destroyed. Do not reuse container. Triple rinse container. Then puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NOTICE: Buyer assumes all responsibility for safety and use not in strict accordance with directions.

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041
EPA REG. NO. 53883-62
EPA Est. No. 53883-TX-002

(NOTIF Opt Marketing statements 02-12-02)

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**CONTROL
SOLUTIONS
INC.**

February 13, 2003

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Re: Notification per (PR) Notice 98-10, Optional Marketing Language
EPA Reg. No. 53883-62 Surrender brand Eraser 18% Systemic Weed & Grass Killer

Dear Sir or Madam:

Enclosed is a Notification for Optional Marketing Language (PR) Notice 98-10. See highlighted text on attached labeling.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions or need additional information, please feel free to contact me.

Sincerely,



Joe Blake
Director, Regulatory Affairs