

66222-22

7/2/2008

1 of 9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL - 2 2008

Jane Rothwell
Makhteshim-Agan of North America, Inc.
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609

Dear Ms. Rothwell:

Jane Rothwell
Makhteshim-Agan of North America, Inc.
4515 Falls of Neuse Road, Suite 300
Raleigh, NC 27609

Dear Ms. Rothwell:

Subject: Label Amendment
Pramitol 25E Herbicide
EPA Registration No. 66222-22
Your submission dated May 15, 2008

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

- A. For all products:
 1. Under "Precautionary Statements";
 - Delete "Remove contaminated clothing . . . and water after handling."
 2. Under Environmental Hazards";
 - Add "This pesticide is toxic to fish and terrestrial invertebrates" at the beginning of this paragraph. Also, add "rinsate" after "equipment washwaters."
 3. Add a section on Personal Protective Equipment and specify the required equipment.
 4. Add the following User Safety Requirements:
 - Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.
 - Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

2009

5. Under "Limitations of Warranty and Liability";

Add "To the extent consistent with applicable law"before" All such risks shall be I assume by user or buyer."

6. The maximum application rate for prometon product is 0.23 lb of active ingredient per 500 sq. ft. You need to ensure your proposed application rates are within this limit.

B. For Products packaged with water soluble pouches:

Under "Industrial Sites and Noncrop Areas";

Change "2 fl. oz per 170 sq. ft to 4 fl. oz. per 170 sq. ft." to the number of soluble pouches under the first paragraph.

C. For products not packaged with water soluble pouches:

Add a weight statement of active ingredient per gallon of product under the ~~head~~ Under "Heading". *ingredient statement 7/10 2/2/08*

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)

CONCURRENCES

SYMBOL >	7505P							
SURNAME >	Bien	Tompkins						
DATE >	6-16-08							

3089

[Note to label editor: This is the MASTER LABEL and is for Pramitol 25E not packaged in water soluble bags. See SECONDARY LABEL at the end of the MASTER LABEL for Pramitol 25E packaged in Water Soluble Bags.]

PRAMITOL[®] 25E

HERBICIDE

FOR TOTAL VEGETATION CONTROL OF WEEDS IN NONCROP AREAS

Bare ground weed control around buildings, storage areas, fences, pumps, machinery, fuel tanks, recreational areas, roadways, guard rails, airports, military installations, highway medians, pipelines, railroads, lumberyards, industrial sites, rights-of-way, and similar areas...

- 1 gallon treats up to 10,000 sq. ft.

ACTIVE INGREDIENT:	% BY WT.
Prometon: 2,4-bis(isopropylamino)-6-methoxy-s-triazine	25.0%
INERT INGREDIENTS:	<u>75.0%</u>
	TOTAL 100.0%

EPA Reg. No. 66222-22

EPA Est. No. 34704-MS-1

Manufactured for:
Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Rd., Suite 300
Raleigh, NC 27609

NET CONTENTS: ___ GALLON(S)

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID

- | | |
|--------------------------------|---|
| IF SWALLOWED: | <ul style="list-style-type: none"> • Call a 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 a poison control center or doctor. |
| IF IN EYES: | <ul style="list-style-type: none"> • Do not give anything by mouth to an unconscious person. • 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. |
| IF ON SKIN OR CLOTHING: | <ul style="list-style-type: none"> • Call a poison control center or doctor for treatment advice. • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. |
| IF INHALED: | <ul style="list-style-type: none"> • Call a poison control center or doctor for treatment advice. • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice. |

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Contains petroleum distillate; vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage. Treat for circulatory shock, respiratory depression, and convulsions, if needed.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Causes substantial but temporary eye injury. Do not get in eyes, on skin, or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Harmful if swallowed, absorbed through skin, or inhaled. Avoid

breathing vapor or spray mist. Remove contaminated clothing and wash clothing before reuse. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

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 used for irrigation or domestic purposes. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill, or store near heat or open flame. Store at temperatures above 32°F.

DIRECTIONS FOR USE

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

GENERAL INFORMATION

Pramitol 25E is a nonselective herbicide that can be applied in water or oil before or after plant growth begins. Although Pramitol 25E has considerable activity through foliar contact, much of its activity is through roots; therefore, **its effectiveness is dependent on rainfall to move it into the root zone. Very dry soil conditions and lack of sufficient rainfall may result in poor weed control.**

Important: Use only in areas where complete control of all vegetation is desired such as industrial sites, rights-of-way, lumberyards, petroleum tank farms, around farm buildings, along fence lines, etc. When applied to the soil, this product usually inhibits plant growth for a year or more.

Following many years of continuous use of this product and chemically related products, biotypes of some of the weeds listed on this label have been reported which cannot be effectively controlled by this and related herbicides. Where this is known or suspected, we recommend the use of this product in combination with other registered herbicides which are not triazines. Consult with your State Agricultural Extension Service for specific recommendations.

Pramitol 25E is generally noncorrosive to equipment but may cause swelling or more rapid deterioration of hoses and fittings containing natural rubber.

INDUSTRIAL SITES AND NONCROP AREAS

Pramitol 25E can be applied before or up to 3 months after weed emergence. Application rates vary from 4 - 10 gals. of Pramitol 25E per acre depending on climatic conditions, soil type, the weeds present, and the stage of growth of the weeds. In the following rate recommendations, the higher rates are intended for use on heavier soils where weed growth is heavy and where rainfall is expected to be relatively high. The higher rates should also be used where longer residual control is desired in regions with a long growing season.

Although Pramitol 25E has considerable activity through foliar contact, much of its activity is through roots; therefore, **its effectiveness is dependent on rainfall to move it into the root zone. Very dry soil conditions and lack of sufficient rainfall may result in poor weed control.**

For best results, apply Pramitol 25E before weeds emerge or when weeds are young and actively growing. For control of annual and susceptible perennial weeds and grasses such as downy brome grass, oatgrass, goosegrass, quackgrass, puncturevine, goldenrod, and plantain: Broadcast 4.0 - 6.125 gals. Pramitol 25E in 50 - 100 gals. of water per acre.

For control of hard-to-kill perennial weeds and grasses such as johnsongrass, bindweed, and wild carrot: Broadcast 7.5 - 10 gals. of Pramitol 25E in 50 - 100 gals. of water per acre.

For faster top-kill of existing vegetation, apply Pramitol 25E in diesel oil, fuel oil, or weed oil. Use oils at rates of 100 - 200 gals. per acre. Tall, dense vegetation such as johnsongrass will generally require 150 or more gals. of oil per acre for thorough coverage.

When applying Pramitol 25E to a small area with backpack or pump-up sprayers with capacities of 1 - 3 gals., calibrate the sprayer so that 1 gal. of water covers 500 sq. ft. Then mix 1/2 - 7/8 pt. Pramitol 25E with water to obtain a total volume of 1 gal. and apply uniformly over a 500 sq. ft. area. For hard-to-kill perennial weeds and grasses, use the higher rate. If green foliage is present, part or all of the water can be substituted with oil to provide burndown.

PRECAUTIONS WHEN USED ON INDUSTRIAL SITES AND NONCROP AREAS: (1) Feeder roots of desirable plants often extend far beyond the drip line of the branches. Do not apply this product or drain or flush application equipment in locations where the chemical may come into contact with root zones of desirable trees, shrubs, or

plants or injury may occur. (2) Do not use on land to be cropped. (3) Do not use for weed control in greenhouses.

ASPHALT PAVEMENT

Pramitol 25E may be used to extend the useful life of asphalt pavement by preventing weeds from emerging through it. Pramitol 25E may be applied to the ground before laying asphalt or it may be mixed with cutback asphalts.

Pramitol 25E should be used only where the area to be treated has been prepared according to good construction practices. If rhizomes, tubers, or other vegetative parts are present in the site, they should be removed by scalping with a grader blade. Recomposition of the site following disking or plowing will allow good penetration of Pramitol 25E and will help to ensure proper asphalt curing and good weed control.

Pramitol 25E will not control woody vegetation such as small trees, brush, or woody vines. Roots of such species should be grubbed and removed from the site before application.

Under Asphalt: Pramitol 25E may be applied to the ground before laying rapid, medium, or slow curing asphalt coatings such as those used on parking lots, highway shoulders and median strips, roadways, and other industrial sites. Pramitol 25E should be applied just before laying of the asphalt coating to prevent possible lateral movement of the herbicide by rainfall or other mechanical means. Sprayers should be equipped to provide continuous agitation of the spray mixture during application to ensure application of a uniform spray emulsion.

Apply Pramitol 25E uniformly at the rate of 7.5 - 10 gals. per acre (22.0 - 29.4 fl. oz. per 1,000 sq. ft.) in a minimum of 100 gals. of water. Use the lower rate to control annual and susceptible perennial weeds and grasses such as downy brome grass, oatgrass, goosegrass, quackgrass, puncturevine, goldenrod, and plantain. Use the higher rate to control hard-to-kill perennial weeds and grasses such as johnsongrass, bindweed, and wild carrot.

Do not use Pramitol 25E under asphalt coatings less than 2 inches thick.

Mixed with Cutback Asphalt: Pramitol 25E may be mixed with standard and special cutback asphalts (such as RC, MC, and SC) for weed control in areas being stabilized such as highway shoulders, highway median strips, under highway fences and guard rails, along airport runways and lights, soil and small stone aggregates on shoulders, and cracked asphalt surfaces being resurfaced.

Pramitol 25E should be simultaneously mixed with the cutback asphalt as it is being pumped into the applicator or transport truck to assure a homogeneous mix. Temperatures in the applicator or transport truck should not exceed 170°F.

Pramitol 25E should be used at the rate of 22.0 - 29.4 fl. oz. per 1,000 sq. ft. (equivalent to 7.5 - 10 gals. per acre of Pramitol 25E). Use the lower rate on ordinary weed and grass complexes such as dallisgrass, King Ranch bluestem, knotroot bristlegrass, and the higher rate where johnsongrass, bermudagrass, or other deep-rooted perennials are present.

In arid areas where deep-rooted perennials are a problem, best results can be obtained by making the application from midsummer through late fall or prior to the rainy season.

PRECAUTIONS WHEN USED UNDER ASPHALT OR MIXED WITH CUTBACK ASPHALT: (1) Do not apply cutback asphalt mixtures containing Pramitol 25E to soil saturated with water. The condition of the soil should be favorable for penetration or proper asphalt curing may be affected. (2) Do not apply Pramitol 25E with asphalt emulsions such as SS. (3) Feeder roots of desirable plants often extend far beyond the drip line of the branches. Do not apply this product or drain or flush application equipment in locations where the chemical may come into contact with root zones of desirable trees, shrubs, or plants or injury may occur. (4) Do not use on land to be cropped. (5) Do not use for weed control in greenhouses.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store at temperatures above 32°F.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

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

6049

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes. In the event of a major spill, fire, or other emergency, call 1-800-535-5053 (INFOTRAC), day or night.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences 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 Makhteshim Agan of North America, Inc. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Makhteshim Agan of North America, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Makhteshim Agan of North America, Inc.'s election, the replacement of product.

Pramitol® is a registered trademark of Makhteshim-Agan of North America Inc.

ACCEPTED
with COMMENTS
in EPA Letter Dated

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

66222-22

JUL - 2 2008

7089

[Note to label editor: This is the SECONDARY LABEL and is for Pramitol 25E packaged in water soluble bags.]

PRAMITOL[®] 25E

HERBICIDE

Packaged in Water Soluble Pouches

FOR TOTAL VEGETATION CONTROL OF WEEDS IN NONCROP AREAS

Bare ground weed control around buildings, storage areas, fences, pumps, machinery, fuel tanks, recreational areas, roadways, guard rails, airports, military installations, highway medians, pipelines, railroads, lumberyards, industrial sites, rights-of-way, and similar areas...

- One pouch treats up to 170 sq. ft.
- Premeasured dose in each water soluble pouch (WSP)
 - Prevents plant regrowth for up to one year
 - Kills almost all vegetation, down to the roots

ACTIVE INGREDIENT:	% BY WT.
Prometon: 2,4-bis(isopropylamino)-6-methoxy-s-triazine	25.0%
INERT INGREDIENTS:	75.0%
	TOTAL 100.0%

EPA Reg. No. 66222-22

EPA Est. No. 34704-MS-1

Manufactured for:
 Makhteshim Agan of North America, Inc.
 4515 Falls of Neuse Rd., Suite 300
 Raleigh, NC 27609

NET CONTENTS: 2 oz. water soluble pouches

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID

- | | |
|--------------------------------|--|
| IF SWALLOWED: | <ul style="list-style-type: none"> • Call a 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 a poison control center or doctor. |
| IF IN EYES: | <ul style="list-style-type: none"> • Do not give anything by mouth to an unconscious person. • 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. |
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NOTE TO PHYSICIAN: Contains petroleum distillate; vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage. Treat for circulatory shock, respiratory depression, and convulsions, if needed.

8099

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

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PHYSICAL OR CHEMICAL HAZARDS

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DIRECTIONS FOR USE

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GENERAL INFORMATION

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INDUSTRIAL SITES AND NONCROP AREAS

Pramitol 25E can be applied before or up to 3 months after weed emergence. Application rates vary from 2 fl. oz. per 170 sq. ft. to 4 fl. oz. per 170 sq. ft. depending on climatic conditions, soil type, the weeds present, and the stage of growth of the weeds. In the following rate recommendations, the higher rates are intended for use on heavier soils where weed growth is heavy and where rainfall is expected to be relatively high. The higher rates should also be used where longer residual control is desired in regions with a long growing season.

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For control of hard-to-kill perennial weeds and grasses such as johnsongrass, bindweed, and wild carrot: When packaged in water soluble pouches, mix two 2 oz. water soluble pouch (WSP) of Pramitol 25E in 2 gallons of water and apply to 170 sq. ft.

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store at temperatures above 32°F.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

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

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes. In the event of a major spill, fire, or other emergency, call 1-800-535-5053 (INFOTRAC), day or night.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

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LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Makhteshim Agan of North America, Inc.'s election, the replacement of product.

Pramitol® is a registered trademark of Makhteshim-Agan of North America Inc.
©1999 Makhteshim Agan of North America Inc., New York, NY

ACCEPTED
with COMMENTS
in EPA Letter Dated

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

6622-22

JUL -2 2008