

67760-59

12/15/2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 15 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Kathryn Luba
Cheminova, Inc
Oak Hill Park
1700 Route 23, Suite 300
Wayne, NJ 07474

Dear Mr. Heckman:

Subject: Glyphos Concentrate 25% Weed & Grass Killer (Add Detailed Directions for Kudzu,
Wild Blackberry, Poison Ivy and Poison Oak and Flowerbeds)
EPA Registration No. 67760-59
Application Dated October 18, 2004

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

James A. Tompkins
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505C)

Glyphos Concentrate 25% Weed & Grass Killer

[See Appendix for consolidated list of
marketing claims]

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
DEC 15 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67760-59

ACTIVE INGREDIENT:

Glyphosate, isopropylamine salt.....25.00%

OTHER INGREDIENTS.....75.00%

Total.....100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See {[Back][Side][Inside] Panel}, [Booklet] For
Additional Precautionary Statements, OR [Peel
Open for Use Directions and Further Information]

EPA Reg. No. 67760-59
EPA Est. No 39578-TX-1

NET CONTENTS:

[OPTIONAL PRODUCT FACT BOX]

PRODUCT FACTS

WHAT IT DOES: Kills all types of weeds and
grasses [down to the root]

WHERE TO USE: Outdoors [icon]: On patios,
walkways, driveways, [around fruits, vegetables],
flowers, shrubs and [or] trees; along fences in large
areas for lawn replacement or [garden plot
preparation]

WHEN TO USE: For best results, apply during
warm, sunny weather (above 60°F)

Questions and Comments:

(icon telephone) (icon computer)

Call 1-800-548-6113 or visit our website
www.cheminova.us.com.

OPTIONAL MARKETING LANGUAGE

[Glyphos Concentrate 25% Weed & Grass Killer
eliminates all common weeds, grasses and
unwanted vegetation.] [Illustrations] [This product
can be used [For edging around lawns] [For lawn
replacement/renovation] [For garden plot
preparation] in driveways, brick and gravel
walkways, curbs, along fences and foundations,
near trees and shrubs, in flower beds, mulch beds,
vegetable gardens, fruit trees, gravel, and other
similar areas of the yard to get rid of undesirable
vegetation. [Do not use on or around edible feed or
food crops.] [Glyphos Concentrate 25% Weed &
Grass Killer can also be used for big jobs such as
lawn renovation, vegetable and flower garden
preparation.]

[HOW IT WORKS] [This product [is a non-
selective herbicide that] will kill all vegetation
contacted. This herbicide kills unwanted plants by
inhibiting the production of a substance found only
in plants. It enters plants through the sprayed
foliage and moves down to the roots. Avoid direct
spray or drift onto desirable plants, lawn grasses,
shrubs and trees. Protect desirable plants and
vegetation with a piece of plastic or cardboard. If
desirable plants are accidentally sprayed, wash
plants with water immediately. Any Glyphos
Concentrate 25% Weed & Grass Killer (product)
not absorbed by the plant is broken down into
natural materials. [This product has no soil activity
and thus will not affect nearby untreated plants.]

CONTROLS ALL TYPES OF WEEDS AND GRASSES INCLUDING:

[Annual weeds and grasses: Annual ryegrass,
annual bluegrass, barnyardgrass, beggarweed, black
medic, blue medic, blue toadflax, brassbuttons, blue
mustard, brome grass, bur clover, buttercup,
cheeseweed, chickweed, clover, common
groundsel, common lamb's quarters, common
plantain, common ragweed, crabgrass, creeping
beggarweed, diffuse lovegrass, dog fennel, evening
primrose, false dandelion, fall panicum, fennel,
fiddleneck, field pennycress, field sandbur, filaree,
Florida pusley, foxtail, garden spurge, goosegrass,
green foxtail, hemp sesbania, henbit,
horseweed/marestail, ironweed, knotweed, lamb's
quarters, little bitter cress, London rocket, maiden
cane, mallow, mayweed, mouseear chickweed*,
oxalis*, Pennsylvania smartweed, pennywort,
pigweed, prickly lettuce, prostrate spurge, puncture
vine, purslane, redroot pigweed, sandspur,
shepherd's purse, smartweed, smooth cat's ear,
smooth pigweed, sowthistle, spotted spurge,
sprangletop, spurges, tansy mustard, tansy ragwort,

teaweed, Texas panicum, tumble mustard, velvetleaf, wild geranium*, witchgrass, wild mustard, yellow nutgrass, yellow oxalis (and many other annual grasses and weeds).]

[Perennial weeds, grasses and brush: Alder, artichoke thistle, bahiagrass, barnyardgrass, bentgrass, Bermudagrass, blackberries, bluegrass, broadleaf plantain, brownseed paspalum, buckhorn plantain, bull thistle, Canada thistle, cattail, ccanothus, centipedegrass, cherry, cocklebur, cogongrass, common mullein, common ragweed, coralbead, coyote brush, creeping bentgrass, creeping Charlie, creeping lantana, curly dock, dallisgrass, dandelion, dewberry, dog fennel, elderberry, false dandelion, fescue species, field bindweed, guineagrass, hairy crabgrass, honeysuckle, horsenettle, horseradish, iceplant, Johnsongrass, Kentucky bluegrass, kikuyugrass, knapweed, knawel, kudzu, lantana, maiden cane, milkweed, mouseear chickweed*, multiflora rose, nimblewill, nutgrass (nutsedge), oak species, oldenlandia, orchardgrass, oxalis*, pampasgrass, pennywort, perennial ryegrass, plantain, poison oak, poison ivy, poison hemlock, primrose, purple cudweed*, purple nutsedge, quackgrass, quaking aspen, ragweed, raspberry, red clover, smooth brome grass, sourdock, sowthistle, St. Augustinegrass, sumac, tall fescue, tansy ragwort, thistle, timothy, torpedograss, trumpet creeper, vaseygrass, Virginia creeper, white clover, whitetop, wild barley, wild blackberry, wild carrot, wild morningglory, wild oats, wild sweet potato, willow, yarrow, yellow nutgrass, yellow starthistle, zoysia [and many other perennial grasses, weeds, brush and sedges] [controls many unwanted weeds/plants] [as listed].] *Annual or Perennial

STOP. Read and follow label instructions

DIRECTIONS FOR USE

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



People and pets should not be allowed in treated areas until spray has dried.

[This product is formulated for "spot" treatment of individual weeds and grasses or for treatment of large areas

as instructed on this label (see specific site areas below)]. Apply with a plastic, aluminum or stainless steel tank-type sprayer. **Do not apply with galvanized or unlined steel sprayer, or through any irrigation system or sprinkling can.**

MIXING INSTRUCTIONS

MIXING INSTRUCTIONS

TANK SPRAYER (plastic, aluminum, fiberglass, plastic-lined steel or stainless steel)

- Add 4.5 fl. Oz. (9 Tbs) to 1 gal of water
- Spot treat or spray evenly over 300 sq. ft

DIAL TYPE HOSE-END SPRAYER

- Set sprayer to the "fl. oz./gallon" level specified in the directions.
- Use only enough product for the area to be treated.
- Close sprayer, attach to hose and apply.

CONCENTRATE PLUS WATER [HOSE END] TYPE SPRAYER

- Determine the amount of concentrate required.
- Pour concentrate into sprayer jar to the required "fl. oz." level.
- Add the required amount of water to the "gals" level.
- Replace sprayer top on jar and apply.

AMOUNT TO USE: 4.5 fl. oz. (9 Tbs) treats 300 sq. ft.

1 Tablespoon (Tbs) equals 3 teaspoons (tsp)
1 fl oz equals 2 Tablespoons (Tbs)

[OPTIONAL ALTERNATE MIXING INSTRUCTIONS]

[Three Easy Steps to Mix and Apply]

Step #1: For lawns and vegetables, measure the area to be sprayed. Calculate square feet by multiplying length by width. For all other applications, apply as a thorough cover spray.

Step #2: Use a clean sprayer. Carefully measure and mix the amount of Glyphos Concentrate 25% Weed & Grass Killer (product) and water as directed. Food utensils such as teaspoons and measuring cups should not be used for food purposes after use with pesticides.

Step #3: Spray as directed. Thorough coverage is important. Flush sprayer with clean water after each use.]

[Amount to use]: [For best results use 4.5 fl oz (9 Tbs) per gallon of water.] [For easy to kill weeds such as seedlings add 2.5 fl oz (4.5 Tbs) to one gallon of water.]

[HOW TO APPLY]

- Completely [wet] [cover] the foliage [leaves] of the target vegetation [plant]. Do not overspray.
- A single application controls most [listed] weeds.
- Most treated weeds usually show initial symptoms in 2-4 days and complete kill in 1-2 weeks.
- Protect desirable plants [including fruit and vegetables], with a piece of plastic or cardboard.
- If desirable plants are accidentally sprayed, wash plants with water immediately.

- Do not mow, cut or otherwise disturb treated [vegetation] [weeds] or [plants] for at least 7 days following application.

[WHEN TO APPLY [USE TIPS]

- For best results, apply during warm, sunny weather (above 60°F) when weeds are actively growing and no rain is forecast for 24 hours. Rainfall or watering 2 hours after application will not wash away effectiveness.
- To avoid drift to desirable plants, apply when the air is calm.

WHEN TO REPLANT

- All ornamental flowers, trees and shrubs [and the following berries, fruits, vegetables and herbs] may be planted **1 day after** application.
[Artichoke (Jerusalem), beans (all), beet greens, blackberry, blueberry, boysenberry, broccoli, Brussels sprouts, cabbage (all), carrot, cauliflower, celery, chard (Swiss), chicory, collards, cranberry, currant, dewberry, elderberry, endive, gooseberry, horseradish, huckleberry, kale, kohlrabi, leek, lentils, lettuce, loganberry, mustard greens, okra, olallieberry, onion, parsley, parsnips, potato radish, rape greens, raspberry (black and red), rhubarb, rutabaga, spinach, sweet potato, turnip and yams.]
 - The following fruits, vegetables and herbs may be planted **3 days after** application:
Corn, cucumber, eggplant, garlic, gourds, melons (all), peas (all), peppers (all), pumpkin, squash (summer and winter), tomatillo, tomato (by seed) and watercress.
 - Lawn grasses may be planted **7 days after** application.
- Tomatoes from transplant and unlisted fruits, vegetables and herbs may be planted **30 days after** application.

[WHERE TO USE] [USE SITES] [USE SITUATIONS]:

GENERAL WEED CONTROL: Use along [near] fences, paths, patios, sidewalks, curbs and driveways, around ornamental trees, shrubs, flower beds and plantings, around buildings. Use for trimming and edging landscapes. **DO NOT use for spot weed treatment in lawns, since Glyphos Concentrate 25% Weed & Grass Killer kills all green plants, including lawn grasses.**

SPOT TREATMENTS: Spray directly on actively growing weeds in and around flower beds, ornamental trees, fruit and nut trees, grapevines, shrubs, fences, driveways and walkways.

WHEN TO HARVEST

If used to control weeds around fruits or nuts, allow the following number of days before harvesting:

- Citrus (citron, grapefruit, lemon, lime, mandarin, orange, tangelo and tangerine) – 1 day.
- Nuts (almond, beechnut, cashew, chestnut, hazelnut, pecan, pistachio and walnut) – 3 days.
- Apple, avocado, banana (plantains), berries (except cranberries), dates, figs, grapes, kiwi fruit, loquat, passion fruit, pear, persimmon, pomegranate and quince – 14 days.
- Apricot, cherries, nectarine, olives, peach, plum and prunes – 17 days.
- If used to control weeds around fruit or nut trees, caneberries or grapevines, allow 17 days before harvesting.

LANDSCAPES: For use in preparing areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flower beds or similar plantings. Treated areas can be replanted 1 day after treatment.

WILDLIFE AREAS SITE

PREPARATION: Use Glyphos Concentrate 25% Weed & Grass Killer to prepare areas for planting wildlife food plots. Exotic or undesirable plants can be controlled with Glyphos Concentrate 25% Weed & Grass Killer to allow for planting or recovery of native plant species. Spot treatments may be directed to selectively remove unwanted plants. **Avoid spray drift to desirable plants. [Be careful to keep spray off desirable plants.]**

FOR LAWN

RENOVATION/REPLACEMENT:

- Use 4.5 fl. oz. (9 Tbs) per gallon of water for each 300 sq. ft. of area to be treated.
- Use this product to remove [kill] the old lawn and existing weeds and grasses.
- For best results, apply in spring or fall, when daytime temperatures are at least 60°F.
- If the lawn is dry [Under dry conditions], water lawn every other day for a week before applying Glyphos Concentrate 25% Weed & Grass Killer.
- Do not mow for 7 days before or after treatment.
- After 7 days, prepare the soil for planting by raking or roto-tilling the lawn. **[Wait 7 days after last application to rake, till or replant with seed or sod]**
- Rake up and remove loosened thatch or debris.
- Mix in starter fertilizer and soil amendments, if needed. Level the soil.
- Apply seed according to directions on seed package, or install sod. Grass seed must have good contact with soil to germinate and grow.
- Keep area moist for 2 weeks to establish new lawn, then water as needed.

FOR BRUSH CONTROL: Apply to green and actively growing brush. For plants taller than 5 feet, cut them back and spray the regrowth. Fall applications to brush may delay control to the

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following season. A second application may be required on hard-to-control species such as blackberry, kudzu or poison oak.

FOR STUMP TREATMENT: Stumps can be treated to prevent regrowth. For best results, treat when the vegetation is actively growing or immediately (within 5 minutes) after being cut down.

- Cut the stump close to the soil surface.
- Make 4-5 nail holes in the stump.
- Flood the stump with undiluted product. [Pour undiluted product into holes.]

This procedure will control or suppress many types of woody brush and trees, such as alder, bluegum eucalyptus, madrone, oak, giant reed, saltcedar, sweetgum, and tan oak.

TO KILL VINES:

- If vine is growing up a pole, fence or mature tree trunk [tree trunks with mature bark], cut vine to a height of 3 to 4 feet and spray to thoroughly cover remaining vine.
- If vine is climbing a shrub or immature (green) tree trunk [tree trunks with green bark], to avoid damage to these plants, cut vine at base and spray its regrowth. Shield shrub and green trunk [bark] from spray drift with a sheet of plastic or cardboard.

KUDZU:

For best results, apply in mid to late summer when vines are mature and actively growing.

WILD BLACKBERRY:

Spray anytime plants are actively growing. Dead canes should be cut down and removed. Reapplication is often required to kill deep roots.

POISON IVY & POISON OAK:

Contact with these plants anytime of the year can cause an allergic reaction. Spray anytime plants are actively growing, but at least 4 weeks before the first killing frost in the fall. Reapply, if new growth appears. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.

FOR FLOWERBED & GARDEN PLOT PREPARATION

Use Glyphos 25% Concentrate Weed & Grass Killer to kill weeds, grasses and brush before planting flowers, fruits, vegetables or herbs.

- If soil is dry, water before application and 2 to 3 days after application.
- Apply evenly over treatment area.
- Wait the number of days indicated below before planting.

STORAGE AND DISPOSAL

Storage: Use and store this product only in its original container. Store product in a secure storage area away from sources of heat or open flame. Protect product from freezing.

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.

Spill or leak: In case of spill or leak, soak up with paper towels and discard in trash.

PRECAUTIONARY STATEMENTS **Hazards to Humans and Domestic Animals**

CAUTION Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash

thoroughly with soap and water after handling. Keep children and pets away from treated areas until spray has dried. Avoid contamination of food. Do not contaminate water supplies.

FIRST AID

If on Skin: 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 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. Have the product in container or label with you when calling a Poison Control Center, doctor, or going for treatment. You make contact 1-866-303-6950 for emergency medical treatment information.

Environmental Hazards

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

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

[*If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.]

[Questions? Comments call toll free 1-800-548-6113 or visit our website www.cheminova.us.com]

Manufactured by
Cheminova Inc.
Oak Hill Park
1700 Route 23, Suite 300
Wayne, NJ 07470
Made in the USA

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GLYFOS CONCENTRATE 25% WEED & GRASS KILLER MARKETING CLAIMS

- 40% more concentrated • 40% stronger • 40% stronger to speed absorption to the root • Absorbed into both broadleaf and grassy weeds • Absorbs on contact, starts working immediately • Also use for large jobs such as lawn renovation and vegetable and flower garden preparation • Approved for most (many) lawn and garden uses • Begins absorbing on contact • Breaks Down Into natural materials • Can be used around (small) fruits and vegetables • Can be used for habitat restoration, controlling exotic vegetation, and for site preparation of wildlife food plots • Can be Used Over the Root Zones of Trees, Shrubs or Desirable Plants • Can reseed or sod lawns 7 days after treatment • Concentrated for extra value • Contains Glyphosate • Controls [Hardy] [Tough] [Hard To Kill] Weeds • Covers up to 300 sq ft per gallon of spray • Dead Weeds Guaranteed or Your Money Back • Does not have soil activity • Economical • Economical concentrate formula • Easy to apply with an Ortho Dial 'n Spray[®], hose-end, tank or (hand held) trigger sprayer • Eliminates Roots and Weeds, [Guaranteed] •

Eliminates Weeds [Guaranteed] • Eliminates [kills] all common weeds and grasses • Fast & [and] complete • For general weed control – kills weeds and grasses in 2 to 4 weeks – roots and all • For use [Ideal] [Can be Used] [Use in and around] [in] [on] [for] [along] [vegetable gardens] [around small fruits and vegetables] [flower beds] [and] [vegetable gardens] [vegetable garden and weed control] [as listed] • For Use [Use] [Ideal] [Can be Used] [Use in and around] [in] [on] [for] [along] [around] [fences], [driveways], [walkways], [shrubs], [trees], [ornamentals] [Walks] [Mulch Beds] [Gravel] [and] [Driveways] [Curbs] • [*Guaranteed Results or your money back] • Guaranteed same effective results even if it rains within hours • Ideal for vegetable garden weed control • Improved extra strength formula • Improved formula, completely kills even the toughest weeds and grasses • Improved formulation – now RainFast- fast uptake • Kills almost all (annual and perennial) weeds, grasses and other unwanted plants • Kills existing weeds only, no residual activity in soil • Kills more weeds in more places • Kills the Entire Plant • Kills over 100 weeds • Kills over 175 varieties of broadleaf and grassy weeds [as listed] • Kills over 175 types of weeds [as listed] • Kills the Root • Kills the roots of (both) broadleaf and grassy weeds • Kills the Root So Weeds Won't Grow Back • Kills unwanted weeds and grasses, roots and all • Kills Weeds and Unwanted Grasses, Roots and All • Kills weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas

in your yard • Lawns and gardens can be reseeded or planted soon after treatment • Make only what you need • Multipurpose grass and broadleaf weed control • [New] [Formula] enters the plant within one to two hours [won't wash off] • [New] Glyphosate Formula • New [Formula] • No mixing (necessary) • No odor • No residual activity in soil • No Root, No Weeds, [Guaranteed] • No root. No weed. No problem. • No Soil Activity, Must be Applied to Foliage • NOW! • Now with Glyphosate • Now a shorter wait for replanting! • Once it enters the plant, it won't wash off • Ornamental gardens can be reseeded or planted 1 day after treatment • Rainproof in 2 hours • Rainproof in 2 Hours for Control That Won't Wash Away • Rainfast in Hours - Starts to enter the Plant on Contact • Rainfast in 2 hours for control that doesn't wash away [won't wash away] • Satisfaction guaranteed or we will gladly refund purchase price • Satisfaction guaranteed or your money back [with proof of purchase] • See results in 24 hours (1 day) • Speeds absorption to the root for complete kill • [Spot] Treatment for [Lawn] [Garden] Replanting • Spray weeds (Use) in flowerbeds, around trees, shrubs and around fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard • Starts working immediately • Starts Working in Hours • Stronger • Systemic Weed and Grass Killer for [Spot] Treatment of Unwanted Weeds and Grasses • (Use) For Brush Control • (Use) For General Weed Control: Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings,

flowerbeds, and buildings, and in brick and gravel walkways • Use to trim and edge landscape areas • (Use) For Landscaping: Use to prepare areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flowerbeds or similar plantings • Use for large jobs like garden plot preparation and lawn replacement (renovation) • (Use) For Lawn Renovation • (Use) For Spot Spraying: Use in and around flowerbeds, ornamental, fruit and nut trees, grapevines, shrubs, fences, driveways and walkways • (Use) For Stumps • (Use) For Wildlife Areas: Use to prepare areas for planting wildlife food. Exotic or undesirable plants can be controlled to allow for planting or recovery of native plant species. Spot treatments can be made to selectively remove unwanted plants. • (Use in) Apply with a Big Shot™ Multi-Purpose Sprayer or other tank sprayer, Ortho Dial 'n Spray® or other hose-end sprayer, or a (hand held) trigger sprayer • Use to prepare sites: for large plantings, for planting flowerbeds, fruit trees, ornamentals, vegetables and gardens, and for renovating lawns • Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction • Visible results in 2 to 4 days (hours) • Water based formula • (Weeds) start dying in 1 day (24 hours) • Works only when absorbed by the foliage of weeds • Water-based • Works First Time, Every Time, Kills the Weeds You See and the Root You Don't