

MAR 10 2003

Ms. Kari E. Mavian
Senior Regulatory Affairs Manager
CHEMINOVA, INC.
1700 Route 23 Suite 300
Wayne, NJ 07470

Dear Ms. Mavian:

This is in response to your request dated February 12, 2003 to change the primary brand name for **EPA Registration 67760-62** from Glyfos® Concentrate 1.25% Weed and Grass Killer to:

GLYFOS READY-TO-USE 1.25% WEED AND GRASS KILLER

Your request for the name change is **accepted** and the change will be made to the Agency's records. All future correspondence on this product should reference the new name.

Sincerely yours,



Sherada D. Hobgood
Notifications Review Coordinator
Registration Division (7505C)

Glyphos Ready-to-Use 1.25% Weed and Grass Killer

See Appendix for consolidated list of marketing claims]

ACTIVE INGREDIENT:

Glyphosate, isopropylamine salt	1.25%
Other ingredients	98.75%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION See (side)(back) (inside) (panel) (booklet) for additional precautionary statements

EPA Reg. No. 67760-62
EPA Est. No. _____

Net Contents: 128 fl oz (1 gal) (3.78L)

OPTIONAL PRODUCT FACT BOX

Product Facts

- Container treats more than/over 200 weeds [24 fl oz.]
- Container treats more than/over 500 weeds [1/2 gal, 2L]
- Container treats more than/over 1000 weeds [1 gal, 4 L]
- Container treats more than/over 1300 weeds [or] Container treats 390 sq. ft [5 L]
- Container treats more than/over 1500 weeds [6L]
- Container treats more than/over 2000 weeds [2 gal]

KILLS WEEDS

[illustrate grassy, broadleaf and woody weeds]
ALL TYPES OF WEEDS AND/& GRASSES

WHERE TO USE:

- On patios, walkways or driveways
- In flower [beds] and/& vegetable gardens
- Around shrubs and/& trees
- Along fences and/& foundations
- Other areas in your yard
- Edging around lawns
- For garden plot preparation

Questions & comments:

(phone icon) (computer icon)
Call 1-800-332-5533 or www.zzzz.com

OPTIONAL MARKETING LANGUAGE

[Chemsico RTU Herbicide Gil eliminates all types of common weeds and grasses [as listed]. (*illustrations*) This product can be used [for] [edging around lawns] [garden plot preparation] in driveways, walkways, curbs, along fences and foundations, near trees and shrubs, in flower beds, mulch beds, vegetable gardens, and other similar areas of the yard to get rid of undesirable vegetation.]

[This product [is a non-selective herbicide that] will kill any vegetation contacted. This herbicide kills unwanted plants by inhibiting the production of a substance found only in plants. It enters plants through the leaves and moves down to the roots. This will ensure that the entire plant is eliminated. 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 herbicide not absorbed by the plant is broken

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down into natural materials. This product has no soil activity and thus will not affect nearby untreated plants.]

[This container covers approximately 300 sq. ft. Coverage may be reduced if large brush species are treated.]

CONTROLS ALL WEEDS AND GRASSES INCLUDING:

[Annual weeds and grasses: Annual ryegrass, annual bluegrass, banyardgrass, beggarweed, black medic, blue medic, blue toadflax, brassbuttons, blue mustard, bromegrass, bur clover, buttercup, cheeseweed, chickweed, clover, common groundsel, common lambsquarters, 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, lambsquarters, 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, shepherdspurse, smartweed, smooth cat's ear, smooth pigweed, sowthistle, spotted spurge, sprangletop, spurges, tansy mustard, tansy ragwort, teaweed, Texas panicum, tumble mustard, velvetleaf, wild geranium*, witch grass, wild mustard, yellow nutgrass, yellow oxalis (and many other annual grasses and weeds)]

[Perennial weeds, grasses, brush:

Alder, artichoke thistle, bahiagrass, banyardgrass, bentgrass, Bermudagrass, blackberries, bluegrass, broadleaf plantain, brownseed, paspalum, buckhorn plantain, bull thistle, Canada thistle, cattail, ceanothus, centipedegrass, cherry, cocklebur, cogongrass, common mullein, common ragweed, coral bead, coyote brush, creeping bentgrass, creeping Charlie, creeping lanтана, 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, lanтана, 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 bromegrass, sourdock, sowthistle, St. Augustine grass, sumac, tall fescue, tansy ragwort, Timothy, torpedograss, trumpetcreeper, vaseygrass, Virginia creeper, white clover, whitetop, wild barley, wild blackberry, wild carrot, wild morning-glory, wild oats, wild sweet potato, willow, yarrow, yellow nutgrass, yellow starthistle, zoysia [and many other perennial grasses, weeds, brush and sedges] [as listed].] *annual or perennial

STOP. Read entire label before use

DIRECTIONS FOR USE

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



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

[When to use] [When to Apply] [Use Tips]

- For best results apply during warm, sunny weather (above 60° F)
- Apply when weeds are actively growing and no rain is forecast for 24 hours.
- To avoid drift to desirable plants, apply when the air is calm.
- Completely [wet] [cover] the foliage [leaves] of the target vegetation [plant]. Do not overspray.
- Sprayed plants begin yellowing and wilting in about 24 hrs, with complete kill, including the roots, in 1 to 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.
- Rainfall or watering within 2 hours after application will not wash away effectiveness.

Not recommended for spot weed treatment in established lawns since lawn grasses will be killed too.

[How to use] [Application Instructions]

Chemsico RTU Herbicide GII is pre-mixed and ready to use and is formulated for "spot" treatment of weeds and grasses. [It is ideal for tough to reach weeds found in flower beds and vegetable gardens.] Use it on driveways and walkways, or around fences, trees, flower beds, vegetables, shrubs and other areas in your yard.

[OPTIONAL EDGER TEXT]

Chemsico RTU Herbicide GII is an easy edger for use along driveways, walkways, curbs, sidewalk cracks, around landscaping, ornamentals, trees, and shrubs. Use in larger areas such as patios and brick and gravel walks. [This product treats 1200 linear feet (3 inch wide band)]

[Bracket text = Optional Language]

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[SPRINKLER CAP APPLICATOR]

1. Remove cap from applicator head and make sure that the applicator head is screwed firmly on the bottle.
2. Hold the bottle about 2 to 6 inches from the area to be treated. Invert the bottle and apply product to thoroughly cover unwanted vegetation. The width of the stream may be adjusted by either raising or lowering the bottle.
3. Use just enough product to completely [cover] [wet] the [vegetation] [plant].

[Sprayer Instructions]**[OPTION A: Hand Sprayer Application]**

How to prime and care for your sprayer:

1. **CONNECT TRIGGER SPRAYER.** Unscrew and discard the [white] cap on the bottle. Insert the hose into the bottle and tighten the cap securely.
2. **PRIME SPRAYER.** Turn the sprayer nozzle one-half turn counter-clockwise. Hold the sprayer lower than the bottle and squeeze the trigger several times until it sprays. Adjust the nozzle to coarse spray pattern. Avoid sprays which are too fine because they can drift and damage other plants.
3. Spray unwanted grass & weeds until completely [covered] [wet].

[OPTION B: Trigger Sprayer applicator]

1. Turn nozzle to coarse spray pattern. Avoid sprays are too fine because they can drift and damage other
2. Spray unwanted grass & weeds until completely [covered] [wet].



which plants.

[OPTION C: Power Pump Instructions]

1. **CONNECT WAND HOSE TO POWER PUMP BOTTLE.** Unwrap the wand. Unscrew and discard the **Black Cap** protecting the bottle opening. (graphic)

Push the **Clear Tube** down through the small opening on the bottle. Tightly screw the **Green Hose Connector Cap** onto the bottle (graphic). Make sure the **Green button** on the wand is "OFF" or "UP" before pressurizing (graphic).

2. **PRESSURIZE THE POWER PUMP.** Break off the **Pump Handle "TAB"** with your thumb (graphic). Pump 20-30 times to build up pressure. NOTE: The Power Pump bottle may bulge slightly as it is pressurized. Never pressurize by any means other than the pump included. You'll need to pump every once in a while to keep the Power Pump pressurized during use.
3. **SPRAY WEEDS AND UNWANTED GRASS!** Just depress the **Green Button** on the wand to spray. If needed, the button can be locked "ON" by pushing it down and forward at the same time. The reverse motion will lock it "OFF" (graphic). Spray unwanted grass or weeds until [covered] [wet].

[WHEN TO REPLANT]

- All ornamental flowers, trees and (&) shrubs may be planted **1 day after** application.
- The following berries may be planted **1 day after** application: Blackberry, Blueberry, Boysenberry, Cranberry, Currant, Dewberry, Elderberry, Gooseberry, Huckleberry, Loganberry, Olallieberry and (&) Raspberry (Black and(&) Red).
- The following fruits, vegetables & (and) herbs may be replanted **1 day after** application: Artichoke (Jerusalem), Beans (all), Beet Greens, Broccoli, Brussels Sprouts, Cabbage (all), Carrot, Cauliflower, Celery, Chard (Swiss), Chicory, Collards, Endive, Horseradish, Kale, Kohlrabi, Leek, Lentils, Lettuce, Mustard Greens, Okra, Onion, Rape Greens, Parsley, Parsnips, Potato, Radish, 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 [re-seeded] **7 days after** application.
- Tomatoes from transplant & (and) unlisted fruits, vegetables & (and) herbs may be planted **30 days after** application.

[WHEN TO HARVEST]

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

- Citrus (Citron, Grapefruit, Kumquat, Lemon, Lime, Mandarin, Orange, Pummelo, Tangelo, Tangerine), Guava, Papaya – **1 day.**
- Nuts (Almond, Beechnut, Brazil Nut, Butternut, Cashew, Chestnut, Filbert, Hazelnut, Hickory Nut, Macadamia, Pecan, Pistachio, Walnut) – **3 days.**
- Apple, Avocado, Banana (Plantains), Berries (except Cranberries), Dates, Figs, Grapes, Loquat, Passion Fruit, Pear, Persimmon, Pomegranate & (and) Quince – **14 days.**
- Apricot, Cherries, Nectarine, Olives, Peach, Plum and (&) Prunes – **17 days.**
- Cranberries – **30 days.**

STORAGE AND DISPOSAL**[OPTION A: Hand Sprayer Application]**

Storage: Turn the nozzle to "OFF" position and store with sprayer above the level of liquid in container to prevent leakage. Store in a cool dry area away from heat or open flame. **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.

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[OPTION B: Trigger Sprayer and Sprinkler Cap]

Storage: Store in a cool, dry area away from heat or open flame. Do not reuse 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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[OPTION C: Power Pump Sprayer]

Storage: Store in a cool, dry area away from heat or open flame. *Always release pressure by unscrewing the pump cap before storing.* **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

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

CAUTION: Harmful if absorbed through the 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. **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 container or label with you when calling a Poison Control Center or doctor, or going for treatment.

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.

Made in the USA by Chemsico, Division of United Industries Corp., P. O. Box 142642, St. Louis, MO 63114-0642

[Questions or Comments? call 1-800-332-5553]



[Bracket text = Optional Language]



CHEMSICO RTU HERBICIDE GII MARKETING CLAIMS

Ready to Use • No Mixing Required • Ready to Use, No Mixing • No Measuring [mixing] [necessary] • Fast Acting [Formula] • New [Now] Tougher Formula • Tougher Formula [kills to the roots] • Contains Glyphosate • 100% more concentrated • 100% Stronger • [New] Glyphosate Formula • Fast & complete • Fast results • Faster than ever • Now with Glyphosate • Starts to Kill Overnight [in] [the same day] • Starts to Kill in Hours • See results in 24 hours [in hours] • Quick Visible Results • Results that show • Speedy Results • Works overnight [in hours] • Begins (Starts) working in hours, [New Formula] • [New][Now] Stronger Formula • [New] [Formula] enters the plant within one to two hours [won't wash off] • [New] Improved for tough weed control • New [Now] stronger formula kills to the root • Water-based • Kills the Root • Kills the Root So Weeds Won't Grow Back • Kills Weeds and Unwanted Grasses, Roots and All • No Root, No Weeds, [Guaranteed] • Eliminates Roots & Weeds, [Guaranteed] • Eliminates Weeds, [Guaranteed] • Can be Used Over the Root Zones of Trees, Shrubs or Desirable Plants • Kills the Entire Plant • 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] • Starts Working in Hours • Starts [working overnight] [to kill overnight] • See results in Hours • Controls Hardy Weeds • No Soil Activity, Must be Applied to Foliage • No residual activity in soil • Does not have soil activity • Breaks down into natural materials • 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 weed control] [as listed] • Works First Time, Every time, Kills the Weed you see and the Root you Don't • Kills over 175 types of weeds [as listed] • Kills over 175 varieties of broadleaf and grassy weeds [as listed] • Eliminates [kills] all common weeds and grasses • Kills Weeds and Unwanted Grasses • Systemic Weed and Grass Killer for [Spot] Treatment of Unwanted Weeds and Grasses • 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] • [Spot] Treatment for Lawn Replanting • No soil activity • Satisfaction guaranteed or your money back with proof of purchases

[Bracket text = Optional Language]