

69361-2

3/19/2001

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MAR 19 2001

Mr. Madhu Mandava
 Agent for
 REPAR CORPORATION
 1730 M Street, NW, Suite 906
 Washington, DC 20036-4512

SUBJECT: Repar Weed and Feed 28-3-9 - Label Review
 EPA Reg. No. 69361-2
 Your Letter Dated November 6, 2000

This letter is in response.d to your above mentioned letter requesting assistance in updating the label. The label has been reviewed and is acceptable provided the following label changes are made.

1. The "Precautionary Statement" be revised as follows:
 "Harmful if swallowed or absorbed through skin. Avoid contact with eye, skin and clothing. Wear goggles, face shield or safety glasses and protective gloves when handling.

2. It is recommended that the "First Aid" statement be revised as follows:
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.
 - Call a poison control center or doctor for treatment advice.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	MINOR, E.							
DATE ▶	Mar 19, 2001							

If on skin:

- 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 swallowed:

- 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 by a poison control center or doctor.

Submit one (1) copy of your final printed labeling before you release the product for shipment. The amended labeling supersedes all previously accepted ones. A stamped copy of the labeling is enclosed for your records.

Sincerely,

Dan Rosenblatt
 Acting Product Manager, (25)
 Herbicide Branch
 Registration Division (7505C)

Enclosure

3 4 6

(FRONT PANEL)

REPAR WEED & FEED 28-3-9

ACTIVE INGREDIENTS:

Chlorflurenol	
Methyl 2-Chloro-9-Hydroxyfluorene-9-Carboxylate	0.49%
Methyl 9-Hydroxyfluorene-9-Carboxylate	0.12%
Methyl 2,7-Dichloro-9-Hydroxyfluorene-9-Carboxylate	0.09%
*Dimethylamine Salt of Dicamba	0.12%
Dimethylamine Salts or Related Acids.	0.03%
INERT INGREDIENTS.	99.15%
TOTAL	100.00%

*Equivalent to 0.102% 3,6-Dichloro-o-Anisic Acid

The contents of this bag treats 5,000 sq. ft.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Statement of Practical Treatment (First Aid)

- IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not give anything by mouth to an unconscious person.
- IF ON SKIN: Wash with plenty of soap. Get medical attention.
- IF IN EYES: Flush with plenty of water. Call a physician.

See back panel for additional precautions

EPA Reg. No. 69361-2

EPA Est. (TBD)

NET WEIGHT: 17.5 lbs.

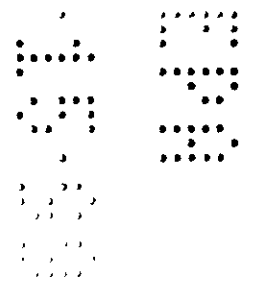
ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 19 2001

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

69361-2

MANUFACTURED FOR:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914



41 7 6

(BACK PANEL)

REPAR WEED & FEED 28-3-9

GUARANTEED ANALYSIS

Total Nitrogen (N)	28%
1.2% Ammoniacal Nitrogen	
20.8% Urea Nitrogen	
6.0% Coated Slow Release Urea Nitrogen	
Available Phosphoric Acid (P ₂ O ₅)	3%
Soluble Potash (K ₂ O)	9%
Sulfur	3.4%

Plant Nutrients Derived From: Ammonium Phosphate, Muriate of Potash;, Urea and Sulfur Coated Urea.

Chlorine (Cl) Maximum 8%

Potential Acidity Equivalent to 1019 lbs. of Calcium Carbonate Per Ton

PRECAUTIONARY STATEMENTS

HAZARDOUS TO HUMANS (& DOMESTIC ANIMALS)

CAUTION

Harmful if swallowed or absorbed through skin. Wear goggles, face shield or safety glasses and protective gloves when handling. Avoid contact with eye, skin and clothing. Wash hands, face and clothing after use. *W.D.* If in eyes, flush with plenty of water and call a physician. In case of skin contact, wash thoroughly with plenty of water. If irritation persists, consult physician. Avoid contamination of food and feed.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to any body of water or wetlands, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from target area. Do not contaminate water by cleaning of equipment or disposal of waste. Do not contaminate water when disposing of equipment washwaters. Do not contaminate domestic or irrigation waters.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Do not apply this product through any irrigation system.

Keep children and pets out of the treated area until sprays have dried. Keep animals and unprotected persons out of operational areas during treatment.

WEED CONTROL

The Repair's Weed and Feed controls a wide range of perennial and annual weeds including Dandelion, Buckhorn Plantain, Common Chickweed, White and Red clovers, Hop Clover, Marestail, Heal All Henbit, Ground Ivy, Knotweed, Black Medic, Furslane, Yellow Rocket, Thistles and other miscellaneous Broadleaf Weeds.

For Use of **ALL** Established Turfs, including sensitive species such as Centipede and St. Augustine, except Desirable Clovers, Bent, Dichondra and Carpet Grass.

EFFECTIVE APPLICATION OF THE REPAIR'S WEED AND FEED FOR MOST WEED LEAVES SHOULD BE DAMP FROM RAIN, DEW OR SPRINKLING TO ALLOW THE PRODUCT TO STICK TO THE LEAF. A LACK OF MOISTURE ON THE WEED LEAVES WILL REDUCE WEED CONTROL.

WHAT TO LOOK FOR:

Because the Repair's Weed and Feed contains no 2,4-D or related herbicides, symptoms of weed killing action may not be the same as those shown by 2,4-D type products. The Repair's Weed and Feed, properly applied, first reduces or eliminates the formation of most flower heads and the seeds they produce and then attacks and removes the mature weed itself. Look for an absence or stunting of seed heads in flowering weeds such as clover or dandelions. Some weeds may also show twisting stems and dwarfed appearance with curling of the leaves.

The Repair's Weed and Feed is designed with an excellent turf nutrient diet to allow grass plants to gradually fill in the areas around dying weeds. This allows for a more natural recovery of the turf and minimizes reinfestations of bare areas by wind-borne weed seeds. Applied as directed, the rich green color will not be affected.

UNDER NORMAL GROWING CONDITIONS, WEED KILL SHOULD BE COMPLETE WITHIN 21 TO 35 DAYS.

WHEN TO APPLY:

Apply any time weeds are actively growing and temperature is above 60°F. Do not apply when turf is under stress for heat, excessive moisture or drought. Control is quicker and more complete if applied in spring prior to weed flower formation. Control is slower if applied when weather is cool. On newly seeded areas, wait until grass has been cut two or three times before using. Delay planting new grass for at least three weeks as the active ingredients may temporarily inhibit seed germination.

HOW TO APPLY:

EFFECTIVE APPLICATION OF THE REPAIR'S WEED AND FEED REQUIRES THE WEED LEAVES TO BE DAMP FROM RAIN, DEW OR SPRINKLING PRIOR TO APPLICATION. A LACK OF MOISTURE ON THE WEED LEAVES WILL REDUCE WEED CONTROL. Apply evenly over the entire lawn at the rate of 3.5 lbs./1000 sq. ft. Rain or heavy sprinkling within 24 hours of application will temporarily delay weed control. Mowing within 24 hours may reduce effectiveness. Wait at least 4 weeks before making a second application.

Use the suggested spreader settings as a guide being sure to check your spreader at the beginning of the application. Adjust your spreader if necessary. Be sure to shut off spreader while turning or stopping to prevent accidental over application and burning of grass. **SPECIAL NOTE:** The Repair's Weed and Feed is designed to be absorbed by plant leaves. Accidental application of this product to the foliage of ornamental such as roses may result in the loss of flowers. For this reason, extra care should be taken when using a broadcast or rotary type spreader.

SUGGESTED SPREADER SETTINGS

- Central
- Central Broadcast
- Cyclone
- Greenview
- Ortho 3000
- Ortho 4000
- Scott Drop
- Scott Broadcast
- Sears Drop
- Sears Broadcast

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Storage: Store in original container in a locked storage area. Keep container closed and away from food, feedstuffs and domestic water supplies.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash. Do not reuse bag. Discard bag in trash.

WARRANTY STATEMENT

MANUFACTURER warrants that this product (1) conforms to the ingredient statement on the label and (2) is reasonably fit for the purposes set forth in the Directions For Use. EXCEPT AS SO WARRANTED, THE PRODUCT IS SOLD AS IS. MANUFACTURER MAKES NO OTHER WARRANTY EXPRESS OR IMPLIED.

The manufacturer's directions regarding use of this product are based upon tests believed to be reliable. All statements made concerning this product apply only when used as directed, under normal use conditions. FOLLOW DIRECTIONS CAREFULLY. Timing and method of application, weather and crop conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the manufacturer.