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C 12/15/2009C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DEC 1 5 2009

12-15-09

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

N. Bhushan Mandava Mandava Associates, LLC 1050 Connecticut Avenue, N.W., Suite 1000 Washington, DC 20036

> Subject: Registration Amendment-Change in Active Ingredient Product Name: Repar Weed and Feed EPA Reg. No. 69361-2 Application dated: July 27, 2009

Dear Mr. Mandava

The basic formulation amendment of the product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. The basic CSF dated 11/19/09 will supercede all previously accepted basic CSF's and will be added to your file.

The labeling for this product, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following changes before you release the product for shipment.

a. Revise "Inert Ingredients" to "Other Ingredients" in the ingredient statement.

b. Revise the Warranty/Liability disclaimer so that the text, "To the extent consistent with applicable law" precedes the following sentences:

1. "Manufacturer makes NO OTHER EXPRESS OR IMPLIED WARRANTY ... "

- 2. "Manufacturer DISCLAIMS ANY LIABILITY FOR COMPENSATORY OR..." Replace "Where permissible," with "To the extent consistent with applicable law,"
- c. Revise the Storage and Disposal section to comply with the container disposal and residue removal instruction of PR Notice 2007-4.

Continued on Page 2

Page 2 EPA Reg. No. 69361-2 Amended Basic CSF and label

A stamped copy of your labeling is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after the next printing must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. Amended labeling will supercede all previously accepted ones.

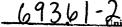
Sincerely, Jim Tompkins Product Manager 25

Product Manager 25 Herbicide Branch Registration Division (7505P)

ACCEPTED with COMMENTS in EPA Letter Dated

DEC 1 5 2009

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



- nique mode of weed killing action.
- Contains no 2, 4D or related herbicides (see back panel).
- Recommended for use on warm and cool season turf types as listed.
- Controls dandelions, clover, dollarweed, chickweed and 200 common lawn weeds (as listed).
- For a thick green weed free lawn.

ACTIVE INGREDIENTS:

Chlorflurenol	
Methyl 2-chloro-9-hydroxyfluorene-9-carboxylate	0.48%
Methyl 2,7-dichloro-9-hydroxyfluorene-9-carboxytate	0.12%
Methyl 9-hydroxyfluorene-9-carboxylate	0.09%
Dicamba Acid	0.11%
Related Acids of Dicamba	0.02%
INERT INGREDIENTS:	99.18%
Total	00.00%

EPA Reg. No. 69361-2

GUARANTEED ANALYSIS

OUARANTEED ANALISIS	
Total Nitrogen (N)	
1.17% Ammoniacal Nitrogen	
26.83% Urea Nitrogen*	
Available Phosphate (P2OJ	
Soluble Potash (K20)	
Sulfur (S)	
3 60% Free Sulfur (S)	

EPA Est. No .-

Plant nutrients derived from ammonium phosphate. urea, muriate of potash and polymer coated sulfur coated urea

•8.90% Slowly Available Urea Nitrogen from Polymer Coated Sulfur Coated Urea Chlorine (CI) Max2.50%

KEEP OUT OF REACH OF CHILDREN CAUTION PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Wear goggles. face shield or safety glasses and protective gloves when handling,

FIRST AID

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

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.

SEE REVERSE SIDE FOR ADDITIONAL INFORMATION

Net Wt. 17.5 Lbs. (7.93 kg) Treats Up To 5,000 Sq. Ft.

REPAR WEED & 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 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

Pennycress. Field

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.

WEED CONTROL

Repar Weed and Feed controls a wide range of annual, biennial, perennial and woody weeds including;

GENERAL WEED LIST

Annuals

Amaranth, Spiny (Spiny Pigweed) Henbil Aster, Slender Bedstraw Beggarweed, Florida Kochia Broomweed, Common Kochia Buckwheat, Wild Buffalobur Burclover, California Burcucumber Buttercup, Roughseed Carpetweed Catchfly, Nightflowering Lettuce, Prickly Chamomile. Corn Chickweed, Common Clovers, Annual Cockle, Corn Cockle, Cow Cocklebur, Common Croton, Tropic Croton, Woolly Daisy. English Eveningprimrose, Cutleaf Fleabane, Annual

(Fanweed, Jimsonweed Frenchweed. Stinkweed) Knotweed Pepperweed, Virginia (Peppergrass) Pigweed, Prostrate (triazine resistant) P weed, Redroot Ladysthumb (Carelessweed) Lambsquarters. Pigweed, Rough Common (Carelessweed) Lambsquarters, Pigweed, Rough (triazine resistant) (triazine resistant) Pigweed, Tumble Mallow. Common Poorjoe Mallow, Venice Puncturevine Mareslail Purslane. Common (Horseweed) Pusley, Florida Mayweed Radish, Wild Medic. Black Ragweed, Common Morningglory. Ivyleaf Ragweed, Giant Morninggtory, Tall (Buffaloweed) Mustard, Tansy Ragweed, Lance-Leaf Mustard. Wild Rubberweed, Bitter Mustard (Yeflowtaps) (Bitterweed) Nightshade, Black

Goosefoot, Nettleleaf

Senna. Coffee Sesbania, Hemp Shephardspurse Sicklepod Sida, Prickly (Teaweed) Smartweed, Green Smartweed, Pennsylvania Sneezeweed, Bitter Sowthistle, Annual Sowthistle, Spiny Spanishrteedles Spikeweed, Common Spurge . Spurr, Corn Starbur, Bristly Stumpweed, Rough Sunflower, Common (Wild) Sunflower, Volunteer Thistle, Russian Velvetleaf. Waterhemp Waterprimrose, Winged Wormwood, Annual

Biennials

Burdock, Common Carrot, Wild (Queen Anne's Lace) Cockle, White Eveningprintrose, Common	Geranium Gromwell Knapweed, Diffuse Knapweed, Spotted Mallow, Dwarf	Plaintain, Bracted Ragwort, Tansy Starthistle, Yellow Sweetclover Teasel	Thistle, Bull Thistle, Milk Thistle, Musk Thistle, Plumeless
Perennials			
Alfalfa*	Clover, Hop*	Milkweed, Climbing	Sowthistle, Perennial
Artichoke, Jerusalem	Dandelion, Common*	Milkweed Common	Spurge, Leafy
Aster, Spiny	Dock, Broadleaf*	Milkweed, Honeyvine	Sundrop, Halfshrub
Aster, Whiteheath	(Bitterdock)	Milkweed, Western	(Eveningprimrose)
Bedstraw, Smooth	Dock, Curly*	Whorled	Thistle., Canada
Bindweed, Field	Dogbane, Hemp	Nettle, Stinging	Toadflax Dalmation
Bindweed, Hedge	Dogfennel*	Nightshade, Silverleaf	Tropical Soda Apple
Bindweed, Texas	(Cypressweed)	(White Horsenettle)	Trumpetcreeper
Bursage*	Fern, Bracken	Onion, Wild	(Buckvine)
(Bur Ragweed,	Garlic, Wild	Plantain, Broadleaf*	Vetch
Lakeweed	Goldenron, Canada	Plantain, Buckhorn	Violet, Wild
Povertyweed)	Goldenrod, Missouri	Pokeweed	Waterhemlock
Bursage, Woolyleaf	Goldenweed, Common	Ragweed, Western	Waterprimrose
(Lakeweed)	Hawkweed	Sericia Lespedeza	Creeping
Buttercup, tall	Henbane, Black	Redvine	Woodsorrel, Creeping*
Campion, Bladder	Horsenettle, Carolina	Smartweed, Swamp	(Common Yellow)
Chickweed, Field	Ironweed	Snakeweed, Broom	Wornswood, Common
Chickweed, Mouseear	Ivy, Ground	Sonel Red*	Wormwood, Lousiana
(Canada)	Knapweed, Black	(Sheep Sorrel)	Yankeeweed*
Chicory	Knapweed, Russian	Sowthistle	Yarrow, Common

* Noted perennials may be controlled using Repar Weed and Feed at rates lower than those recommended for other listed perennial weeds.

Woody

Ailanthus	Ivy, Poison	Kudzu	Sagebrush, Fringe
Sassfras	Gallberry	Serviceberry	Wild Grape
Oak, Poison	Sumac	Brazilian Pepper	Tarbush
Honeysuckle	Hombeam	Witchhazel	Huckleberry
Huisache			2

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

EFFECTIVE APPLICATION OF REPAR 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 Repar 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. Repar 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.

Repar 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

SPREADER SETTINGS

Spreader	Rate: 3.5#/M	Pattern Setting	Width
Earthway Broadcast	11	-	8
Lely	4 1/2	Ш-В	42
Lesco Broadcast	D 1/2	0.0	11
Prizelawn Broadcast	4 1/4	A	7
Scotts Broadcast	1	5	10
Spyker	3	-	9
Vicon	29	-	4
Cyclone Broadcast	33/4		5

Important: These are approximate settings. Age and condition of your spreader can cause wide variation. Be sure to calibrate your spreader with each application.

WHEN TO APPLY:

Apply any time weeds are actively growing and temperature is above 60⁹F. Do not apply when turf is under stress from 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 new 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 REPAR 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/1,000 sq.ft. Rain or heavy sprinkling with 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: Repay Weed And Feed is designed to be absorbed by plant leaves. Accidental application of this product to the foliage of ornamentals 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.

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 mixtures 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.

IMPORTANT: READ BEFORE USE:

Read the entire Directions for Use and the Warranty Disclaimer and Limitation 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 Warranty Disclaimer and Limitation of Liability:

WARRANTY DISCLAIMER and LIMITATION of LIABILITY

Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. Manufacturer makes NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. Where permissible, it is Manufacturer's intent to LIMIT ANY LIABILITY FOR SPECIAL, CONSEQUENTIAL OR INCIDENTAL ECONOMIC DAMAGES to refund of purchase price or replacement of product, at Buyer's choice. Manufacturer DISCLAIMS ANY LIABILITY FOR COMPENSATORY OR OTHER DAMAGES ARISING OUT OF ANY USE CONTRARY TO LABEL DIRECTIONS. Use contrary to label directions is not permitted.

LEGAL RIGHTS:

THIS LIMITED WARRANTY GIVES YOU SPECIFIC LEGAL RIGHTS: YOU MAY HAVE OTHER RIGHTS THAT VARY FROM STATEIJURISDICTION TO STATEIJURISDICTION.

Manufactured for

Repar Corporation, P.O. Box 4321 Silver Spring, Maryland 20914