

69361-3

12/14/2009

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

DEC 14 2009

12-14-09

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 Broad Spectrum Weed and Feed
EPA Reg. No. 69361-3
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 07/27/09 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.

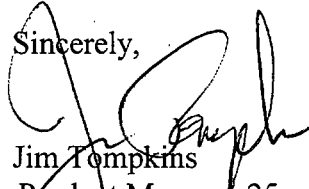
- a. Revise "Inert Ingredients" to "Other Ingredients" in the ingredient statement.
- b. Revise the Storage and Disposal section to comply with the container disposal and residue removal instruction of PR Notice 2007-4.
- c. Revise the Warranty/Liability disclaimer so that the text, "To the extent consistent 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,"
- d. Revise the typographical errors in the "Weed Control" section:
"Buckhorn" to Buckhorn; "Ground Ivy" to Ground Ivy; "Pursalane" to Purslane

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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
Herbicide Branch
Registration Division (7505P)

ACCEPTED
with COMMENTS
in EPA Letter Dated
DEC 14 2009

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

69361-3

REPAR BROAD SPECTRUM WEED & FEED

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

Unique 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:

Chlorfuretol	
Methyl 2-chloro-9-hydroxyfluorene-9-carboxylate	0.12%
Methyl 2,7-dichloro-9-hydroxyfluorene-9-carboxylate	0.03%
Methyl 9-hydroxyfluorene-9-carboxylate	0.02%
Dicamba Acid	0.11%
Related Acids of Dicamba	0.02%
INERT INGREDIENTS:	99.70%
Total	100.00%

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GUARANTEED ANALYSIS

Total Nitrogen (N)	28.00%
1.2% Ammoniacal Nitrogen	
20.8% Urea Nitrogen	
6.0% Coated Slow Release Area Nitrogen	
Available Phosphate (P2O5)	3.00%
Soluble Potash (K2O)	9.00%
Sulfur (S)	5.40%
Plant nutrients derived from ammonium phosphate, urea, muriate of potash and polymer coated sulfur coated urea.	

Chlorine (Cl) Max8.00%
Potential Acidity Equivalent to 1019 lbs. of Calcium Carbonate Per Ton.

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 BACK PANEL FOR ADDITIONAL INFORMATION

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

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.

For Use of ALL Established Turfs, including sensitive species such as Centipede and St. Augustine, except Desirable Clovers, Bent, Dichondra and Carpet Grass. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purpose.

WEED CONTROL

Repar Broad Spectrum Weed and Feed controls a wide range of perennial and annual weeds including Dandelion, Buckhorn Plantain, Common Chickweed, White and Red Clover, Hop Clover, Maretail, Heal All, Henbit, Ground Ivy, Knotweed, Black Medic, Purslane, Yellow Rocket, Thistles, & other miscellaneous Broadleaf Weeds

GENERAL WEED LIST

Annuals

Amaranth, Spiny (Spiny Pigweed)	Goosefoot, Nettleleaf	Pennycress, Field (Fanweed,	Senna, Coffee
Aster, Slender	Henbit	Frenchweed.	Sesbania, Hemp
Bedstraw	Jimsonweed	Stinkweed)	Shephardspurse
Beggarweed, Florida	Knotweed	Pepperweed, Virginia (Peppergrass)	Sicklepod
Broomweed, Common	Kochia	Pigweed, Prostrate.	Sida, Prickly (Teaweed)
Buckwheat, Wild	(triazine resistant)	P weed, Redroot (Carelessweed)	Smartweed, Green
Buffalobur	Ladysthumb	Pigweed, Rough (Carelessweed)	Smartweed, Pennsylvania
Burclover, California	Lambsquarters, Common	Pigweed, Rough (triazine resistant)	Sneezeweed, Bitter
Burcucumber	Lambsquarters, (triazine resistant)	Pigweed, Tumble	Sowthistle, Annual
Buttercup, Roughseed	Lettuce, Prickly	Poorjoe	Sowthistle, Spiny
Carpenterweed	Mallow, Common	Puncturevine	Spanishneedles
Catchfly, Nightflowering	Mallow, Venice	Purslane, Common	Spikeweed, Common
Chamomile, Corn	Maresail (Horseweed)	Pusley, Florida	Spurge
Chickweed, Common	Mayweed	Radish, Wild	Spurr, Corn
Clovers, Annual	Medic, Black	Ragweed, Common	Starbur, Bristly
Cockle, Corn	Morningglory, Ivyleaf	Ragweed, Giant (Buffaloweed)	Stumpweed, Rough
Cockle, Cow	Morningglory, Tall	Ragweed, Lance-Leaf	Sunflower, Common (Wild)
Cocklebur, Common	Mustard, Tansy	Rubberweed, Bitter (Bitterweed)	Sunflower, Volunteer
Croton, Tropic	Mustard, Wild		Thistle, Russian
Croton, Woolly	Mustard (Yellowtops)		Velvetleaf
Daisy, English	Nightshade, Black		Waterhemp
Eveningprimrose, Cutleaf			Waterprimrose, Winged
Fleabane, Annual			Wormwood, Annual

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Biennials

Burdock, Common
Carrot, Wild
(Queen Anne's Lace)
Cockle, White
Eveningprimrose,
Common

Geranium
Gromwell
Knapweed, Diffuse
Knapweed, Spotted
Mallow, Dwarf

Plantain, Bracted
Ragwort, Tansy
Starthistle, Yellow
Sweetclover
Teasel

Thistle, Bull
Thistle, Milk
Thistle, Musk
Thistle, Plumelless

Perennials

Alfalfa*
Artichoke, Jerusalem
Aster, Spiny
Aster, Whiteheath
Bedstraw, Smooth
Bindweed, Field
Bindweed, Hedge
Bindweed, Texas
Bursage*
(Bur Ragweed,
Lakeweed,
Povertyweed)
Bursage, Woolyleaf
(Lakeweed)
Buttercup, tall
Campion, Bladder
Chickweed, Field
Chickweed, Mouseear
(Canada)
Chicory
Chicory

Clover, Hop*
Dandelion, Common*
Dock, Broadleaf*
(Bitterdock)
Dock, Curly*
Dogbane, Hemp
Dogfennel*
(Cypressweed)
Fem, Bracken
Garlic, Wild
Goldenrod, Canada
Goldenrod, Missouri
Goldenweed, Common
Hawkweed
Henbane, Black
Horsenettle, Carolina
Ironweed
Ivy, Ground
Knapweed, Black
Knapweed, Russian

Milkweed, Climbing
Milkweed, Common
Milkweed, Honeyvine
Milkweed, Western
Whorled
Nettle, Stinging
Nightshade, Silverleaf
(White Horsenettle)
Onion, Wild
Plantain, Broadleaf*
Plantain, Buckhorn
Pokeweed
Ragweed, Western
Sericia Lespedeza
Redvine
Smartweed, Swamp
Snakeweed, Broom
Sorrel, Red*
(Sheep Sorrel)
Sowthistle

Sowthistle, Perennial
Spurge, Leafy
Sundrop, Halfshrub
(Eveningprimrose)
Thistle, Canada
Toadflax Dalmation
Tropical Soda Apple
Trumpet creeper
(Buckvine)
Vetch
Violet, Wild
Waterhemlock
Waterprimrose
Creeping
Woodsorrel, Creeping*
(Common Yellow)
Wormwood, Common
Wormwood, Louisiana
Yankee weed*
Yarrow, Common

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

Woody

Ailanthus
Sassfras
Oak, Poison
Honeysuckle
Huisache

Ivy, Poison
Gallberry
Sumac
Hornbeam

Kudzu
Serviceberry
Brazilian Pepper
Witchhazel

Sagebrush, Fringe
Wild Grape
Tartar
Huckleberry

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 REPAIR BROAD SPECTRUM 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 Repair Broad Spectrum 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. Repair Broad Spectrum 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.

Repair Broad Spectrum 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	III - B	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	3 1/4	-	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 60°F. 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 REPAIR BROAD SPECTRUM 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:** Repair 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 STATE JURISDICTION TO STATE JURISDICTION.

Manufactured for:
Repair Corporation, P.O. Box 4321
Silver Spring, Maryland 20914

b/h