

69361-23

12/10/2008

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U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Reg. Number:
69361-23

Date of Issuance:
DEC 10 2008

NOTICE OF PESTICIDE:

x Registration
Reregistration
(under FIFRA, as amended)

Term of Issuance: Conditional

Name of Pesticide Product:
Reaplon Ester Herbicide

Name and Address of Registrant (include ZIP Code):

Repar Corporation
c/o N. Bhushan Mandava
Mandava Associates, LLC
1730 M Street, N.W., Suite 906
Washington, DC 20036

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
2. Submit one-year studies of storage stability (guideline 830.6317) and corrosion characteristics (guideline 830.6320) upon completion. Observations should be made at 0, 3, 6, 9, and 12 month intervals.
3. Make all of the label changes specified in the attached document "Summary of Comments on Specimen Label".

Submit one copy of final printed labeling incorporating the above changes before you release the product for shipment. Please include an electronic label in pdf text format of the final printed labeling with your submission.

Signature of Approving Official:

[Handwritten signature]

Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

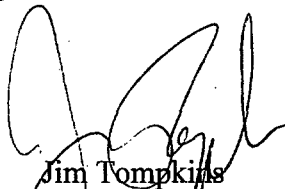
Date:

DEC 10 2008

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.

A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, you may contact Tobi Colvin-Snyder at 703-305-7801 or Colvin-Snyder.Tobi@epa.gov.



Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

Summary of Comments on Specimen Label

Page: 1

Author: tsnyder
Subject: Cross-Out
Date: 12/3/2008 3:30:10 PM



Author: tsnyder
Subject: Line
Date: 12/3/2008 3:09:06 PM



Author: tsnyder
Subject: Highlight
Date: 12/3/2008 2:23:44 PM



Move text to immediately following "Harmful if Swallowed."


Author: tsnyder
Subject: Note
Date: 12/10/2008 12:06:18 PM



Add the following text:

Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for Injunctive Relief in Washington Toxics Coalition, et al. v. EP, Co1-0132C, (W.D. WA)" For further information, please refer to <http://www.epa.gov/espp/wtc/>.

Page: 4

Author: tsnyder
Subject: Note
Date: 12/3/2008 3:17:57 PM
 Add text at blue edit mark.

Author: tsnyder
Subject: Inserted Text
Date: 12/3/2008 3:18:33 PM
T To the extent allowed by applicable law,

S/2

~~Draft Label~~ Repar Corporation

REAPLON ESTER Specialty Herbicide

For the control of annual and perennial broadleaf weeds and kikuyugrass in ornamental turf.

Active Ingredient:	
triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid, butoxyethyl ester	61.6%
Inert Ingredients	38.4%
Total	100.0%

Contains petroleum distillates
Acid equivalent: triclopyr - 44.3% - 4 lb/gal

Keep Out of Reach of Children CAUTION PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

First Aid

If **swallowed**: Call poison control center or doctor immediately for treatment advice. Do not give any liquid to the person. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Note to Physician: This product may pose an aspiration pneumonia hazard. Contains petroleum distillates.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For Medical Emergency Assistance, call the National Pesticide Information Center 1-800-858-7378.

For chemical emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300.

Manufactured for:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

EPA Reg. No. 69361-_____ EPA Est. No: _____

NET CONTENTS: _____ GALLONS

ACCEPTED
with **COMMENTS**
In EPA Letter Dated

DEC 10 2008

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

69361-23

Precautionary Statements

Hazards to Humans and Domestic Animals

Harmful If Swallowed. ←

Avoid contact with eyes, skin, or clothing. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category E on an EPA chemical resistance category selections chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber, or Viton
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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.

Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Physical or Chemical Hazards

Combustible.

Do not use or store near heat or open flame.

Notice: Read the entire label. Use only according to label directions. Before buying or using this product, read Warranty Disclaimer and Limitation of Remedies elsewhere on this label.

In case of emergency endangering health or the environment involving this product, call CHEMTREC 1-800-424-9300.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

Directions for Use

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

Read all Directions for Use carefully before applying.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides.

It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber, or Viton
- Shoes plus socks

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for Agricultural Pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Entry Restrictions for Non-WPS Uses: For applications to turf other than sod farms, do not allow entry into treated areas until sprays have dried unless coveralls, chemical resistant gloves, and shoes plus socks are worn.

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Pesticide spray mixture or rinsate water that cannot be used according to label instructions must be disposed of on site or at an approved waste disposal facility.

Container Disposal:

Nonrefillable containers 5 gallons or less:

Container disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse as follows:** Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers 5 gallons or less:

Container disposal: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of this container.

Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers of 5 gallons or larger:

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over on its other end and tip it back and forth several times.

Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse as follows:** Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

GENERAL INFORMATION

Reaplon Ester specialty herbicide is recommended for the control of actively growing annual and perennial broadleaf weeds and kikuyugrass in perennial bluegrass, perennial ryegrass, or tall fescue ornamental turf including these turfgrasses in sod farms and golf courses.

General Use Precautions (Read Carefully Before Using)

In Arizona: The state of Arizona has not approved Reaplon Ester for use on sod farms.

- Do not apply more than 8 lbs/ae/A/year of Triclopyr
- Do not apply by aerial application
- Do not allow grazing to any area treated with Reaplon Ester

Local conditions may affect the use of herbicides. Consult your local specialist for advice in selecting treatments from this label to best fit local conditions.

Reaplon Ester may injure certain turfgrass species. Do not apply to bahiagrass, bentgrass, bermudagrass, centipedegrass, St. Augustine grass, or zoysiagrass, unless turf injury can be tolerated.

Do not apply Reaplon Ester directly to, or otherwise permit it to come in contact with or permit spray mists containing Reaplon Ester to drift onto, cotton, grapes, tobacco, vegetable crops, flowers, fruit or orchard trees, shrubs, or other desirable broadleaf plants.

Do not apply Reaplon Ester to exposed roots of shallow rooted trees and shrubs.

Do not apply to golf course greens.

For spot treatments, do not apply more than 2 quarts of Reaplon Ester per acre in a single application.

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Avoid Injurious Spray Drift: Applications should be made only when there is little or no hazard from spray drift. Very small quantities of spray, which may not be visible may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants near enough to be injured. Spray drift can be reduced by spraying when wind velocity is low, keeping the spray boom as low as possible, using nozzles that deliver larger spray droplets, and by using higher volume sprays and lower pressures.

Do not apply to ditches used to transport irrigation water. Do not apply where runoff or irrigation water may flow onto susceptible crops.

Chemigation: Do not apply this product through any type of irrigation system.

Reaplon Ester is formulated as a low volatile ester. However, the combination of spray contact with impervious surfaces, such as roads and rocks, and increasing ambient air temperatures, may result in an increase in the volatility potential for this herbicide, increasing a risk for off-target injury to sensitive crops such as grapes and tomatoes.

Broadleaf Weeds Controlled By Reaplon Ester Include:

black medic	lespedeza
bull thistle	matchweed
burdock	mustard
Canada thistle	oxalis
chicory	plantain
clover	ragweed
creeping beggarweed	smartweed
curly dock	sweet clover
dandelion	vetch
field bindweed	wild carrot
goldenrod	(Queen Annes lace)
ground ivy	wild lettuce
kikuyugrass †	wild violet
lambsquarters	yarrow

† See control of kikuyugrass under Application Directions.

Mixing Instructions

When Reaplon Ester is mixed with water it forms an emulsion (not a solution) and separation may occur unless the spray mixture is agitated continuously.

Add about one-half the required amount of clean water to the spray tank. Start agitation and add the specified amount of Reaplon Ester. Provide moderate agitation while completing the addition of water and during application.

Application Directions

Foliar sprays should be applied during warm weather, from early spring through fall, when weeds are actively growing. Broadleaf weeds germinate at different times. Only emerged weeds present at the time of application will be controlled. Newly seeded turf should be mowed 2 or 3 times before being treated. When making applications to mature plants, hard to control species, or during drought conditions, use higher rates. Application under drought conditions may provide less than desirable results. Use low pressure sprays to minimize spray drift. Do not water for 24 hours after application.

Reseeding Precaution: Do not reseed for 3 weeks after application. (This precaution does not apply when bermudagrass turf is overseeded with perennial ryegrass at a minimum reseeding rate of 400 lb per acre.)

Broadcast Treatment of Ornamental Turf

Apply 1/2 to 1 quart per acre of Reaplon Ester in enough water to provide uniform coverage of the target area to control actively growing broadleaf weeds growing in perennial bluegrass, perennial ryegrass, or tall fescue.

Do not use on other turfgrass species (see General Use Precautions) unless injury can be tolerated. To minimize turf injury, do not treat if turf is under heat or drought stress and make repeat applications at least 4 weeks apart.

Tank Mixing: To improve the spectrum of activity, Reaplon Ester may be tank mixed at a rate of 1/2 to 1 pint per acre with specified rates of low volatile amine or ester formulations of 2,4-D, MCPP, or other labeled postemergence broadleaf herbicides provided that the tank mix product is registered for use on ornamental turfgrass. Refer to tank mix product labels for specific use directions, precautions, and limitations before use.

Spot Treatment of Ornamental Turf

Mix 3/8 to 3/4 ounces of Reaplon Ester per 1000 square feet in enough water to provide uniform coverage of the target area and apply at any time broadleaf weeds are susceptible. **Note:** Do not apply more than 2 quarts per acre or 1.5 ounces per 1000 square feet of Reaplon Ester in a single application.

Control of Kikuyugrass

Apply Reaplon Ester at a rate of 1/2 to 1 quart per acre. Three to four additional applications at 4 to 6 week intervals may be required to achieve control of kikuyugrass.

Suppression of Bermudagrass

Apply Reaplon Ester at the rate of 1 quart per acre. Three to four additional applications at 4 week intervals will be required to give adequate suppression of bermudagrass and allow fescue or other desired turfgrass species to dominate. To improve suppression and control of bermudagrass, 1 quart per acre of Reaplon Ester may be tank mixed with a post emergence grass herbicide registered for this use pattern. Three to four additional applications of this tank mix at 4 week intervals should be made to achieve control. Reseeding following application will accelerate the transition to cool season turf (see Reseeding Precaution above).

Warranty Disclaimer

Repar Corporation 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, subject to the inherent risks set forth below. Repar Corporation MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Repar Corporation or the seller. To the extent allowable by applicable law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent allowable by applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Repar Corporations' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used

Repar Corporation shall not be liable for losses or damages resulting from handling or use of this product unless Repar Corporation is promptly notified of such loss or damage in writing.

To the extent allowed by applicable law, in no case shall Repar Corporation be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Repar Corporation or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.