

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 21 1998

Ms. Peggy M. Galloway
 Ecoval Technologies, Inc.
 c/o Landis International, Inc.
 P.O. Box 5126
 Valdosta, GA 31603-5126

Dear Ms. Galloway:

Subject: Amendment - Label and Product Name Change
 EcoClear
 EPA Registration No. 69836-1
 Your Submission dated February 17, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Under PRECAUTIONARY STATEMENTS add the following heading and text:

.....PERSONAL PROTECTIVE EQUIPMENT (PPE).....
 Applicators and other handlers must wear: Appropriate protective eyewear such as goggles or face shields. Long-sleeved shirt and long pants, waterproof gloves and shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exists for PPE use detergent and hot water. Keep and wash PPE seperately from other laundry.

2. Under DIRECTIONS FOR USE following the first statement add the following text:

.....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 requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

We have no objection to your request for product name change from "EcoClear Ready-To-Use" to "Nature's Glory".

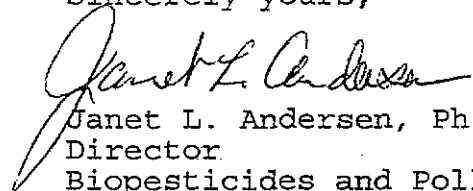
CONCURRENCES							
SYMBOL	7511W	7511W					
SURNAME	Moats	[Signature]					
DATE	4/9/98	4/9/98					

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If you have any questions, please contact Dr. Sheila A. Moats at (703) 305-6701.

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

Sincerely yours,



Janet L. Andersen, Ph.D
Director
Biopesticides and Pollution
Prevention Division (7511W)

Enclosure:

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EcoClear: commercial product (front panel)

Nature's Glory™
 The Clearly Natural Choice FAST ACTING
 WEED & GRASS KILLER

For Non-Selective Control of Herbaceous Broadleaf and Grass Weeds
in Non-Crop, Right-of-Way, and Industrial Land Sites

ACTIVE INGREDIENT:
 Acetic Acid: Ethanoic Acid [C₂H₄O₂] 25.00%
INERT INGREDIENTS: 75.00%
Total: 100.00%

EPA REG. NO. 69836-1

EPA EST. NO. 69836-CAN-001

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

STATEMENT OF PRACTICAL TREATMENT

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.)

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured by: Ecoval Technologies Inc.
3600 boul. du Tricentenaire, Montreal, Qc, Canada H1B 5M8

Net Contents: 2.5 U.S. Gallons

ACCEPTED
with COMMENTS
in EPA Letter dated

APR 21 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
69836-1

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
DANGER

Corrosive, causes irreversible eye damage. Harmful if absorbed through skin. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Do not apply this product in a way that will contact workers or other persons either directly or through drift. Wear goggles or face shields, long sleeved shirts and trousers when handling. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS:

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 by cleaning of equipment or disposal of equipment washwaters. Do not apply to roosting or nesting birds, or during flowering when bees are actively foraging.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

DIRECTIONS FOR USE

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

EcoClear is a postemergent foliar active vegetation management product formulated to contain an organic acid. It is non-selective to green foliage and non-residual in soil. EcoClear is recommended for the control of herbaceous broadleaf and grassy weeds on non-cropland areas, such as railroad rights-of-way, power stations, industrial sites and driveways; around farm buildings, storage areas and tank farms; in and around greenhouses; around plant nurseries and golf courses; and in fence rows and vacant lots. EcoClear is fast acting. Foliar contact results in rapid burndown and control of annual weeds and grasses and top growth reduction of herbaceous perennial weeds and grasses (see table below). Retreatment is required for control of established perennial weeds.

FOR EARLY SEASON ANNUAL WEED CONTROL: When weeds are small (3 to 5 leaf) and actively growing, mix a spray solution consisting of 1 gallon of EcoClear for each 3 gallons of water. Ensure adequate mixing. Spray unwanted vegetation to point of wetness. **SPOT TREATMENT APPLICATION:** Use a single nozzle or a hand-gun applicator to direct the spray and thoroughly wet undesirable foliage. Retreatment of perennial weed regrowth will be required for control. **BROADCAST APPLICATION:** Can be used for broadcast application. For broadcast applications, use a volume of 75 gallons to 125 gallons/acre. Thorough coverage is necessary to achieve desirable control. For dense populations and heavy foliage, use the higher spray volume to ensure adequate coverage. Apply with flat fan nozzles and sufficient pressure to achieve required coverage.

FOR CONTROL OF LARGER ANNUALS AND BURNDOWN OF PERENNIAL WEED GROWTH: Mix a spray solution consisting of 1 gallon of EcoClear for each 2.25 gallons of water. Use an application system and solution volume that will ensure thorough coverage of unwanted vegetation. Best results with these larger weeds will be achieved by spot treatment.

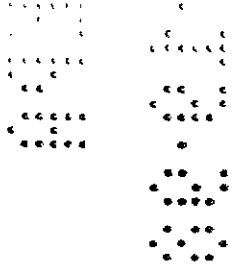
Best results are achieved from Spring/early Summer applications to actively growing young weeds. Weeds that are mature, dormant, or hardened due to moisture stress are more tolerant of herbicide treatments. Only contacted vegetation will be affected. Rainfast within one hour of application.

Avoid application to reactive metals such as aluminum, tin, iron, or items such as fencing or lawn furniture in order to prevent staining, mottling, or otherwise interfering with finished metal surfaces. In case of contact, rinse the sprayed surfaces with water.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 48 hours.

DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.

NOTE: All contacted vegetation will be affected. Avoid contact with desirable plants. Overspray or drift will injure or kill contacted vegetation.



TYPICAL WEEDS CONTROLLED

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ANNUAL BROADLEAF WEEDS		ANNUAL GRASSES
Black medic	Lamb's-quarters	Crab Grass
Chickweed	Mustard spp.	Foxtail spp.
Cinquefoil (rough)	Oxalis spp.	
Cocklebur	Pigweed spp.	
Crotalaria	Ragweed spp.	
Curled dock	Sickle pod	
Fleabane spp.	Velvet leaf	
Ivy leaf morning glory		

PERENNIAL BROADLEAF WEEDS	PERENNIAL GRASSES	OTHERS
Cinquefoil (silvery)	Bluegrass	Algae
Clover spp.	Quack grass	Mosses
Dandelion		Liverwort
Plantain spp.		
Toadfax		
Tufted vetch		
Wild carrot		

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL

STORAGE: Keep from freezing. Store only in original tightly-sealed container and out of reach of children.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE

The label instructions for the use of this product reflect the opinion of experts based on research and field use. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, herbicide-resistant weed populations, or the use of or application of the product contrary to label instructions, all of which are beyond the control of Ecoval Technologies Inc. All such risks shall be assumed by the user. Ecoval Technologies Inc. shall not be responsible for losses or damages resulting from the use of this product in any manner not set forth on this label. User assumes all risks associated with the use of this product in any manner not specifically set forth on this label.

Ecoval Technologies Inc. warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the directions for use, subject to the risks referred to above. Ecoval does not make or authorize any agent or representative to make any other warranties, express or implied, and expressly excludes and disclaims all implied warranties of merchantability or fitness for a particular purpose. Buyer's exclusive remedy and Ecoval's exclusive liability shall be limited to repayment of the purchase price of this product. In no case shall Ecoval or the seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by Ecoval Technologies Inc. and is accepted as such by the buyer.

U.S. Patent No 5,573,997

