

71995-43

5/15/2009

19/14



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

MAY 15 2009

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

Monsanto Company, Lawn and Garden Products
1300 (Eye) Street, NW
Suite 450 East
Washington, DC 20005

Subject: EPA Reg. 71995-43 / RD 1646 / 2,4-D RED Amendment

The labeling referred to above is in compliance with the 2,4-D RED and is amended under the RED 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) Please note: Final product reregistration can't be considered until after all active ingredients in this product are eligible for reregistration.
- 3) The Environmental Hazard text must be revised to read:

"This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters or rinsate.

This pesticide contains chemicals that have properties and characteristics associated with chemicals detected in groundwater. The use of this pesticide in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Applications around a cistern or well may result in contamination of drinking water or groundwater."

- 4) The following text must be added to the label after the Environmental Hazard Text:

"Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn or garden, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day."

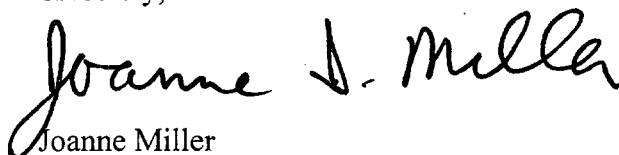
- 5) Per the MCPP-p RED, the text "wait at least 30 days between treatments" must be added to the label.

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6) To the Notice section, add "To the extent consistent with applicable law" in front of "Buyer assumes".

You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after 12 months from the date of this letter or the next printing of the label whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Sincerely,



Joanne Miller
Product Manager 23
Herbicide Branch
Registration Division (7505P)

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[Editorial Notes: Bracketed test [] is for internal use and serves as a 'place holder' for graphics. Parenthetical text () denotes optional wording.]

[Refer to APPENDIX 1 for consolidated list of label claims.]

[Refer to APPENDIX 2 for packaging related claims.]

[FRONT]

RD 1646

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 15 2009

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

71995-43

Active Ingredients

2,4-D, isooctyl ester	1.346%
2,4-D.....	0.182%
Mecoprop-p *	0.359%
Dicamba	0.090%

Other Ingredients..... 98.023%

* Contains the single isomer form of Mecoprop-p

[The ingredient statement footnote can be located on back panel if insufficient room exists on the front label]

Isomer Specific Method, Equivalent to:

2,4-D Acid (total).....	1.076%
Mecoprop-p Acid *	0.359%
Dicamba Acid.....	0.090%

[Or alternate statement] This product contains 1.076% 2,4-D acid equivalent, 0.359% Mecoprop-p* acid equivalent, and 0.090% dicamba acid equivalent.

XX-X-X [Insert fertilizer N-P-K ratio]

KEEP OUT OF REACH OF CHILDREN


CAUTION

See back panel (booklet) for additional precautionary statements. (Read precautions and directions on the back label)

NET WEIGHT: _____ lbs

[BACK]

HOW IT WORKS [OPTIONAL TEXT]
[Insert brand name] is a 4-way selective (turf) herbicide that kills (unwanted) broadleaf weeds without harming the desirable turf while it nourishes your lawn. It is an effective blend of herbicides designed to kill broadleaf weeds such as dandelion, clover and plantains. (This product works on broadleaf weeds by increasing their growth rate. The new tissues block the nutrient/food transport system (phloem) which starve certain plant structures (roots) resulting in plant death.) In addition, [Insert brand name] formula contains a unique blend of (4) nitrogen sources that provide rapid as well as long term feeding of the turf roots and shoots that lasts up to 3 months. And it's guaranteed not to burn. The result is a greener, thicker lawn that is more resistant to drought, diseases and insects.

Product Facts Treats up to ___ sq ft [See Appendix 2 for value] [Add other product benefit claims from Appendix 1]	
KILLS WEEDS	[Optional Illustration(s)] Dandelion, clovers, plantains and over 250 other broadleaf weeds
WHERE TO USE	FOR CONTROL OF BROADLEAF WEED ON THE FOLLOWING TYPES OF (RESIDENTIAL) LAWNS [Alternate text] FOR (RESIDENTIAL) LAWNS <ul style="list-style-type: none"> • Bahia grass • Bermuda grass • (Kentucky) Bluegrass • Centipede grass • Fescue • Ryegrass (perennial) • St. Augustine grass • Zoysia grass <p>IMPORTANT: Do not use on Carpetgrass, Dichondra, or on lawns where desirable clovers are present.</p>
[Re-entry icon]	<ul style="list-style-type: none"> • Do not allow people (other than applicator) or pets on treatment area during application. • Do not allow people and <u>or</u> pets to enter <u>the</u> treated areas until dusts has <u>have</u> settled.
	Questions, Comments or Medical Information Call [insert contact #] (Or visit [insert website address])

DIRECTIONS FOR USE	
It is a violation of Federal law to use this product in a manner inconsistent with its labeling. (For best results, read the entire label before using this product.)	
IMPORTANT USE PRECAUTIONS	<ul style="list-style-type: none"> • Do not use on Carpetgrass, Dichondra, or on lawns where desirable clovers are present. • Do not allow this product to wind drift onto vegetables, flowers,

	<p>ornamental plants, shrubs, trees or other desirable plants.</p> <ul style="list-style-type: none"> • Do not spread over the exposed roots of trees or ornamentals. • Do not exceed recommended rates because turf injury may occur. • Do not exceed specified rates for any area, be particularly careful within the dripline of trees and other ornamental species. • Do not reseed treated areas sooner than 3 to 4 weeks after application. • Do not apply to newly seeded or sodded lawn until after 3 mowings.
<p>WHEN TO APPLY (FOR BEST RESULTS) (BEFORE YOU APPLY)</p>	<p><i>[Optional text]</i> [Insert brand name] controls a wide range of lawn weeds including; dandelion, chickweed, plantain, ground ivy, henbit, spurge and many other common weeds found in home lawns. In addition, [Insert brand name] contains slow release nitrogen that feeds the turf for up to 3 months.</p> <p>For best results (follow these instructions)</p> <ul style="list-style-type: none"> • Apply when weeds are actively growing in the Spring or Fall • A second application may be made approximately 30 days later if low moisture conditions prevail and weeds are not actively growing, or if lawn is heavily infested with weeds. • Avoid mowing turf 1 to 2 days before and after application. • Apply when turf is moist from dew, after a rain or sprinkler irrigation. • Avoid unnecessary disturbances of treated area (like heavy foot traffic) or irrigation for 48 hours. A thorough watering may be made 2 days after application. • Avoid application if rainfall is expected within 48 hours after treatment <p>Note: When applying to Southern turfgrasses (Centipede grass, St. Augustine grass) under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grasses.</p>
<p>USER SAFETY RECOMMENDATIONS</p>	<ul style="list-style-type: none"> • Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. • Users should remove clothing immediately if product gets inside, then wash thoroughly and put on clean clothing.
<p>APPLICATION RESTRICTIONS</p>	<ul style="list-style-type: none"> • Do not apply this product in a way that will contact any person or pet, either directly or through drift. <u>Keep people and pets out of the area during application.</u> • Only the person applying this product may be in the area during application. • The maximum number of broadcast applications per treatment site is 2 per year
<p>HOW TO APPLY</p>	<p>The 16-pound bag (or 48 pound) bag should be applied evenly over 5,000 (or 15,000) square feet of turfgrass. It is recommended that</p>

drop spreaders and rotary spreaders be calibrated to ensure the accurate application of this product. The following settings are approximate for applying the contents of this package at a suggested rate of 3.2 pounds per 1,000 square feet. These settings are furnished only as a guide. Age, spreader condition, operating speed and unevenness of terrain can cause variation in applied rates of product. Settings are based on an average walking speed. Reduce setting for slower speed; increase setting for higher walking speed. Check your spreader over 250 square feet of turf and adjust to apply at the rate of 0.8 lb per 250 square feet. Fill the spreader on the driveway or sidewalk to minimize spillage on the lawn. Close the spreader openings when turning to change directions or when stopping. When using a rotary spreader, avoid spreading product into nearby landscape, flower or vegetable plantings.

Suggested Spreader Settings:
(One pass application)

[Optional rotary spreader graphics]

Rotary/Centrifugal Spreaders	Application Rate 3.2 lbs./1,000 sq. ft.
Earthway 2050	14
Ortho Rotary	2
Precision Rotary	5
Republic EZ Grow Rotary	5 ¾
Scotts Edgeguard	5 ¾
Scotts Speedygreen 1000	5 ¾
Scotts Speedygreen 2000	5 ¾
Scotts Speedygreen 3000	5 ¾
Tru Temper Rotary	3 ¾
Vigoro 4000 Rotary	4 ¾

[Optional drop spreader graphics]

Drop Spreaders	Application Rate, 3.2 lbs./1,000 sq. ft.
Ortho Drop	5
Precision Drop	6 ¼
Republic EZ Drop	6 ½
Scotts AccuGreen 1000	7 ½
Scotts AccuGreen 2000	7 ½
Scotts AccuGreen 3000	7 ½
Vigoro 4000 Drop	2

Sweep all fertilizer materials from surfaces immediately after application. Do not wash into lawn, landscape bedding or any drain including sewer.

	[Required for product being sold in Kentucky when product does not deliver 1 lb of nitrogen per 1000 sq ft] A lawn will typically utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing [insert # lbs] pounds of nitrogen per 1,000 square feet and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.
HOW TO CLEAN SPREADER	Wash out spreader with water after each use and allow to dry thoroughly before storing. Treat any exposed metal spreader part with oil to reduce corrosion.

WEEDS CONTROLLED [Optional section]			
Alder	Dogfenel	Oxalis	Stinging nettle
Annual yellow sweet clover	Elderberry	Oxeye daisy	Stinkweed
Artichoke	English daisy	Parsley-piert	Stitchwort
Aster	Fall dandelion	Parsnip	Strawberryclover
Austrian fieldcress	False dandelion	Pearlwort	Sumac
Bedstraw	False flax	Pennycress	Sunflower
Beggartick	False sunflower	Pennywort	Sweet clover
Biden	Fiddleneck	Peppergrass	Tall nettle
Bindweed	Field bindweed	Pepperweed	Tall vervain
Bird vetch	Field pansy	Pigweed	Tansy mustard
Bitterweed	Flea bane (daisy)	Pineywoods bedstraw	Tansy ragwort
Bitter wintercress	Flixweed	Plains coreopsis	Tanweed
Black-eyed susan	Florida betony	Plantain	Tarweed
Black medic	Florida pusley	Poison hemlock	Thistle
Black mustard	Frenchweed	Poison ivy	Tick trefoil
Blackseed plantain	Galinsoga	Poison oak	Taodflax
Blessed thistle	Garlic mustard	Pokeweed	Trailing crownvetch
Blue lettuce	Goathead	Poorjoe	Tumble mustard
Blue vervain	Goatsbeard	Povertyweed	Tumble pigweed
Box elder	Goldenrod	Prairie	Tumbleweed
Bracted plantain	Ground ivy	Prickly lettuce	Velvetleaf
Brassbuttons	Gumweed	Prickly sida	Venice mallow
Bristly oxtongue	Hairy bittercress	Primrose	Veronica
Broadleaf dock	Hairy fleabane	Prostrate knotweed	Vervain
Broadleaf plantain	Hawkweed	Prostrate pigweed	Vetch
Broomweed	Healall	Prostrate spurge	Virginia buttonweed
Buckhorn	Heartleaf drymary	Prostrate vervain	Virginia creeper
Buckhorn plantain	Hedge bindweed	Puncture vine	Virginia pepperweed
Bulbous buttercup	Hedge mustard	Purslane	Wavyleaf bullthistle
Bull nettle	Hemp	Ragweed	Western clematis
Bull thistle	Henbit	Red clover	Western salsify
Burdock	Hoary cress	Redroot pigweed	White clover
Burning nettle	Hoary plantain	Red sorrel	White mustard
Bur ragweed	Hoary vervain	Redstem filaree	Wild mustard

Burweed	Honeysuckle	Rough cinquefoil	Wild aster
Buttercup	Hop clover	Rough fleabane	Wild buckwheat
Canada thistle	Horsenettle	Roundleafed marigold	Wild carrot
Carolina geranium	Horsetail	Rush	Wild four-o'clock
Carpetweed	Indiana mallow	Russian pigweed	Wild garlic
Catchweed bedstraw	Ironweed	Russian thistle	Wild geranium
Catsear	Jewelweed	St. johnswort	Wild lettuce
Catnip	Jimsonweed	Scarlet pimpernel	Wild marigold
Chickweed	Kochia	Scotch thistle	Wild onion
Chicory	Knawel	Sheep sorrel	Wild parsnip
Cinquefoil	Knotweed	Shepherdspurse	Wild radish
Clover	Lambsquarter	Slender plantain	Wild rape
Cockle	Lespedeza	Smallflower galinsoga	Wild strawberry
Cocklebur	Locoweed	Smartweed	Wild sweet potato
Coffeebean	Lupine	Smooth dock	Wild vetch
Coffeeweed	Mallow	Smooth pigweed	Willow
Common chickweed	Marshelder	Sneezeweed	Witchweed
Common mullein	Matchweed	Southern wild rose	Wooly morninglory
Common sowthistle	Mexicanweed	Sowthistle	Woodsorrel
Corn chamomile	Milk vetch	Spanishneedle	Wooly croton
Creeping jenny	Milkweed bloodflower	Spatterdock	Wooly plantain
Crimson clover	Mugwort	Speedwell	Wormseed
Croton	Morninglory	Spiny	Yarrow
Cudweed	Mousear chickweed	Spiny amaranth	Yellow rocket
Curly dock	Musk thistle	Spiny cocklebur	Yellowflower pepperweed
Curly indigo	Mustard	Spotted catsear	Other broadleaf weeds
Dandelion	Narrowleaf plantain	Spotted knapweed	
Dead nettle	Narrowleaf vetch	Spotted spurge	
Dock	Nettle	Spurge	
Dogbane	Orange hawkweed	Spurweed	

STORAGE AND DISPOSAL [Optional trash can illustration]

PESTICIDE STORAGE: Store in original container in a dry place inaccessible to children and domestic animals. Keep product away from direct sunlight.

DISPOSAL: Do not reuse this container. **If Empty:** Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency (or 1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product, remove clothing and launder separately before reuse. Wash hands and exposed skin promptly after use with soap and water.

[Optional:] People and pets may enter treated areas after dust has settled.

re-entry state- ment appears earlier in label] [Re-entry icon]	
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FIRST AID

- | | |
|-------------------|---|
| If in eyes | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. • Call a poison control center (insert contact #) or doctor for additional treatment advice. |
|-------------------|---|

Emergency Medical Information

- Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
- You may contact [Insert contact telephone #] for emergency medical treatment information.
- This product is identified as [**Insert brand name**], EPA Reg. No. 71995-43

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

This 2,4-D components of this product have properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination of drinking water or ground water.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Guaranteed Analysis:

- Total Nitrogen (N)X%
- X% Ammoniacal Nitrogen
- X% Urea Nitrogen*
- X% Other Water Soluble Nitrogen*
- X% Water Insoluble Nitrogen*
- Available Phosphate (P₂O₅)X%
- Soluble Potash (K₂O)X%
- Sulfur(S)X%
- X% Free Sulfur (S)
- Chlorine (Cl) MaximumX%

[Chlorine declaration is optional except where required by State Fertilizer Regulations]

Derived from: polymer-coated sulfur-coated urea, urea, diammonium phosphate, potassium sulfate, ammonium sulfate, methylenediurea and dimethylenetriurea

*Contains X% Slowly Available Nitrogen from *[List sources]*

Primary plant food sources: *[List sources]*

This product is protected by U.S. Patent No. *[Insert relevant patent numbers]*. (Other patents pending.) No license granted under any non-U.S. patent(s).

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© _____ MONSANTO COMPANY

Manufactured for
Monsanto Company
Lawn & Garden Products
800 N. Lindbergh Blvd.
St. Louis, MO 63167
EPA Reg. No. 71995-43
Form No.
EPA Est.
Superscript is first letter of lot number
Made in USA

71995-43
Approved 6 July 2005

RD 1646 EPA Master Label
Submitted August 31, 2007 2,4-D RED Response

APPENDIX 1 – Consolidated List of Label Claims

• (Contains) (Now with) FastAct (II) Technology
• (Contains) FastAct™ (technology)
• [Insert brand name] Kills the weed you see and the root others leave behind
• After [graphic of dead weed]
• Before [graphic of live weed]
• Begins working in hours, New Formula
• Begins working on contact
• Completely kills even the toughest broadleaf weeds
• Contains 2,4-D (Mecoprop-p) (Dicamba)
• Contains AMS for rapid, dense green up
• Contains Fast Act Technology for speed & efficacy
• Contains Fast Act Technology with visible results in 24 hours
• Controls existing weeds, is not a pre-emergent
• Dead Weeds Guaranteed (or Your Money Back)
• Dual potassium source promotes disease, drought and traffic resistant turf
• Easy (-ier,)To Use (convenient, handy, useful, well-situated)
• Economical
• Ester formula for speed and efficacy
• Fast acting formula
• Fast and complete
• Fast and total
• Fast results
• Fast Uptake
• Fast-acting formula absorbs to root more quickly
• Feeds up to 3 months
• For a beautiful weed free lawn
• For a beautiful weed free lawn
• For Control of Tough Weeds
• Gets to the Root in hours
• Got Tough Broadleaf Weeds in your Lawn - Get [Insert brand name]
• Guaranteed (we guarantee it)
• Guaranteed [results]
• Guaranteed effective: Kills over 250 types of weeds roots and all, with [Insert brand name]
• Guaranteed results (with one application)
• Ideal for killing unwanted broadleaf weeds throughout your yard.
• Improved (faster formula)
• Improved extra strength formula
• Improved for tough weed control
• Improved formula, completely kills even the toughest weeds with just one application
• Increased strength for Intense Weeds
• Industry leading performance

• Kill Tough Weeds Quickly
• Kills (the toughest weeds) the root so weeds (they) don't come back
• Kills (to) the root
• Kills 250+ weeds
• Kills 250+ weeds
• Kills dandelion, clover, chickweed and others
• Kills dandelion, clover, chickweed and others
• Kills even tough weeds
• Kills lawn weeds, promotes Thick Green Turf
• Kills the root so weeds don't come back
• Kills the toughest weeds (always- guaranteed)
• Kills the weed you see and the root you don't
• Kills to the Root (in 24 hours)
• Kills tough broadleaf weeds
• Kills tough broadleaf weeds
• Kills tough weeds – fast
• Kills Tough Weeds (to the Root) (Fast)
• Kills tough weeds in 2 to 3 weeks
• Kills Ugly, Annoying (Undesirable)(Unwanted) Weeds in your lawn
• Kills weeds - roots and all
• Kills weeds – not lawns
• Kills weeds ((clear) down to the root) in (24 hours) (days) (2-4 weeks) (roots and all)
• Kills weeds clear down to the root, 1 st time, every time so weeds don't come back – guaranteed
• Kills weeds dead
• Kills weeds down to the roots
• Kills weeds not lawns
• Kills weeds, roots and all
• New (formula)
• New 4-way control with 3-month greening
• New 4-way feeding that greens in 3 days and feeds for 3 months
• New 4-way proprietary ester formulation
• Next day (this weekend) results: Begins killing on contact, visible results in 24 hours
• No Root, No Weed, No Problem for your lawn
• No waiting, weeds wilt in days
• Now
• Once it enters the plant, it won't wash off
• One application kills over 250 broadleaf weeds, roots and all (maximum effectiveness)
• Outdoor use only [optional graphic]
• Overnight speed
• Patented FastAct (II) Technology
• Patented formula with 4-way control
• Provides maximum control: Kills weeds to the root so they don't ever come back
• Quick and easy to use

• Quick kill formula
• Quick uptake, eliminates weather concerns
• Quick visible results
• Quick-action formula lets you see results
• Ready-To-Spread (broadleaf weed killer) (tough weed killer)
• Results that show
• Satisfaction guaranteed or we will gladly refund purchase price
• Satisfaction guaranteed or your money back with proof of purchase
• See results in 24 hours (overnight)
• Speedy results
• Starts to kill [in] the same day
• Starts to kill in hours
• Starts to kill in/within the same day
• Starts to kill overnight
• Starts working overnight (in hours) (fast)
• Strong (-er) formula
• Superior dandelion & clover control
• Systemic weed killer
• The easy way to kill tough (lawn) weeds
• The fast weed killer (starts working immediately)
• Tougher formula (kills to the roots)
• Treats up to XX sq ft
• Use [Insert brand name] to control weeds in your lawn
• Visible results in 24 hours (days)
• Weeds start dying in 1 day
• Won't harm lawns
• Works first time, every time (guaranteed)
• Works in 24 hours (days)
• Works on [insert weed list]
• Works overnight
• Works to the root in hours

[Promotional options]

- Save up to \$[x] on (your) next purchase
 - Free weed guide inside
 - Free [] with this purchase
 - FREE REFILL
 - FREE SAMPLE
- SAMPLE NOT FOR SALE

APPENDIX 2 – Packaging Related Claims

NET 16 lbs 48 lb

PULL HERE TO OPEN LABEL
PEEL HERE
PEEL OPEN FOR USE DIRECTIONS AND FURTHER INFORMATION
PRESS TO RESEAL

16 lbs treats 5000 sq ft
48 lbs treats 15,000 sq ft