

72155-3

01/17/2001

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JAN 17 2001

Mr. Bruce R. Spesard
 Bayer-Pursell, LLC
 1500 Urban Center Pkwy., Suite 520
 Birmingham, AL 35242

Dear Mr. Spesard:

SUBJECT: Label Amendment Adding Groundwater Advisory, "Shake Well Before Use"
 and Updating Company Website Information
 Lawn Herbicide TN Concentrate
 EPA Registration No. 72155-3
 Your Application Dated January 9, 2001

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided you make the following changes:

1. Add the following restriction to the Directions for Use as required by the 2,4-D Exposure Reduction Agreement:

"The maximum number of broadcast applications per treatment site is two per year."

2. In the Disposal instructions, revise the last "bulleted" statement ("Place in trash") to read as specified in the 2,4-D Registration Standard:

"Securely wrap original container in several layers of newspaper and discard in trash."

3. In the Precautionary Statements, revise the "bullets" which follow the statement "After using this product and before eating, drinking, chewing gum, or using tobacco:" to read as specified in the 2,4-D Exposure Reduction Agreement:

- Rinse gloves before removing,
- Remove clothing and launder separately before reuse, and
- Promptly and thoroughly wash hands and exposed skin with soap and water.
- Remove saturated clothing as soon as possible and shower.

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CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jan 17, 2001							

4. Under Environmental Hazards, revise the third "bulleted" statement to read:

"Drift or runoff may harm aquatic invertebrates and plants."

5. Add the following statements to the Environmental Hazards section [NOTE: The MCPP Registration Standard requires these statements on all products except Ready-to-Use homeowner products.]:

"When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources."

This labeling supersedes all previously accepted labeling for the subject product. A stamped copy of the label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment.

Sincerely yours,



James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

Enclosure

Lawn Herbicide TN Concentrate

- Kills listed weeds
- Kills hard-to-control [tough] weeds
- Kills the weeds, not the lawn
- All-in-one lawn weed killer
- Gets the root
- Kills over 200 types of weeds
- Systemic
- Won't harm lawns
- Treats up to X square feet
- Convenient MEASURE-UP™ Cup
- Kills tough weeds like ground ivy, chickweed, clover & nutgrass
- Won't Harm Your Lawn

ACTIVE INGREDIENTS:

Monosodium acid methanearsonate	18.00 %
2,4-D, dimethylamine salt	5.83 %
Mecoprop-p, dimethylamine salt	2.93 %
Dicamba, dimethylamine salt	1.46 %
OTHER INGREDIENTS:	71.78 %

THIS PRODUCT CONTAINS:

Total Arsenic (as elemental) all in water soluble form 8.33%.

4.84 % 2,4-D acid equivalent

2.42 % Mecoprop-p acid equivalent

1.21 % Dicamba acid equivalent
Isomer Specific by AOAC Method.

Net Contents: 16 fl. oz. (473 mL) or 24 fl. oz. (709 mL) or
32 fl. oz. (946 mL) or 1 Gal. (3.78 L)

KEEP OUT OF REACH OF CHILDREN

WARNING

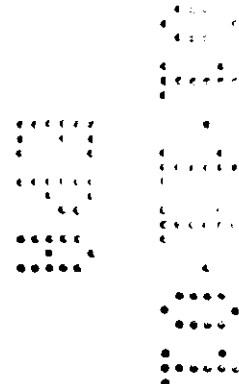
See Back Panel [Booklet] for Additional Ingredients and Precautionary Statements

[] Information is optional

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

JAN 17 2001



**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
72155-3**



(BACK PANEL)

Lawn Herbicide TN Concentrate kills hard to control weeds in one step. This convenient formula kills grassy weeds such as Nutgrass/Nutsedge and broadleaf weeds such as Ground Ivy, Chickweeds, Clovers and other listed weeds. Controlling weeds in your lawn has never been easier.

READ THE LABEL FIRST!

QUICK FACTS (Claims positioned here)	
KILLS	Grassy Weeds: Nutgrass/Nutsedge Broadleaf weeds: Ground Ivy, Chickweeds, Clovers, and Oxalis (and other listed grassy and broadleaf weeds)
WHERE TO USE	On Lawns (NOT for use on Carpetgrass, Centipede, Creeping Fescue, Dichondra, St. Augustine (including Floratam) or desirable clovers.)
WHEN TO USE	<ul style="list-style-type: none"> When weeds are actively growing Temperature Limitations: Temperatures above 80 °F - Do not apply on Kentucky Bluegrass, Perennial Rye or Tall Fescue Temperatures above 90 °F - Do not apply on Bermuda or Zoysia
HOW MUCH TO USE	Northern Lawns: 1-1/2 oz. per 500 sq. ft. [Treats up to X sq. ft.] Southern Lawns: 2 oz. per 500 sq. ft. [Treats up to Y sq. ft.] (see lawn types under Direction for Use)
 	For questions or comments, call toll-free 1-877 BayerAL or visit us on-line at www.BayerAdvanced.com

FOR OUTDOOR RESIDENTIAL USE ONLY

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ACTIVE INGREDIENTS:

Monosodium acid methanearsonate	18.00 %
2,4-D, dimethylamine salt	5.83 %
Mecoprop-p, dimethylamine salt	2.93 %
Dicamba, dimethylamine salt	1.46 %
OTHER INGREDIENTS*:	71.78 %

TOTAL 100.00 %

*Other ingredients include: Water, suspending aids (to keep the active ingredients dispersed in water), surfactants (to keep the active ingredients dispersed in water), and antifoam.

THIS PRODUCT CONTAINS:

Total Arsenic (as elemental) all in water soluble form 8.33%.
4.84 % 2,4-D acid equivalent
2.42 % Mecoprop-p acid equivalent
1.21 % Dicamba acid equivalent
Isomer Specific by AOAC Method.


EPA Reg. No. 72155-3

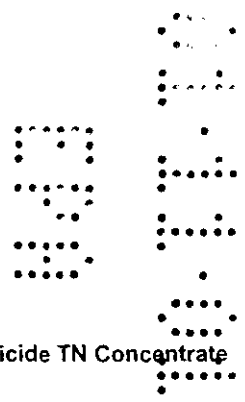
EPA Est. No. XXXX-AA-XX

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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 and follow all label directions.	
BEFORE YOU USE Read and follow directions when using.	<ul style="list-style-type: none"> Do not apply near lakes, streams, rivers or ponds. Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Apply when wind is calm. Do not apply while grass is emerging from dormancy. Newly seeded lawns may be treated after the fourth mowing. Do not apply with a hose-end sprayer.
HOW TO USE SHAKE WELL BEFORE USE	<ul style="list-style-type: none"> Determine amount of product to use based on grass type and size of area to be treated. Dilute product with water in sprayer. Pressurize sprayer. Apply.
HOW MUCH TO APPLY	Northern Lawns: Kentucky Bluegrass, Perennial Ryegrass and Tall Fescue 1-1/2 oz. (3 Tbs. or 9 tsp.) per gallon of water Each gallon of solution treats 500 sq. ft. Southern Lawns: Bermuda and Zoysia 2 oz. (4 Tbs. or 12 tsp.) per gallon of water Each gallon of solution treats 500 sq. ft. TIP: Measure length and width of area to be treated in feet. Multiply these 2 numbers together. This is the area to be treated in square feet (sq. ft.)
HOW TO APPLY PUMP-STYLE AND PLUNGER TANK SPRAYERS	<ol style="list-style-type: none"> Add the appropriate amounts of water and concentrate to the sprayer tank. Close sprayer, shake well and pressurize. Set nozzle to a coarse spray pattern. Broadcast Treatment — Apply evenly over area. Spot Treatment — Hold tip of wand 12 inches from weed, aim at center of weed and spray. Occasionally repressurize the sprayer if needed to maintain a good spray pattern.
Continued in next column	

DIRECTIONS FOR USE continued	
FOR BEST RESULTS	<ul style="list-style-type: none"> Apply when weeds are young and actively growing Apply when the lawn has adequate moisture (to promote the rapid uptake of the herbicide by the weeds). If the lawn is dry, water 24 hours before using this product. Water again 24 hours after application. Do not use this product if rain is likely within 24 hours. Apply 1 to 3 days after mowing (mowing encourages weed growth which enhances uptake of the weed killer). Certain hard-to-kill weeds may need to be spot treated in 14 days. Bare spots may be seeded 3 to 4 weeks after application.
HOW LAWN HERBICIDE TN CONCENTRATE WORKS	LAWN HERBICIDE TN CONCENTRATE is a <i>selective</i> [lawn] herbicide — it <i>selectively</i> kills weeds in the lawn but won't harm the lawn itself. It is a blend of proven weed killers designed to get broadleaf weeds such as dandelion, clover and chickweed and grassy weeds such as crabgrass and nutgrass/nutsedge. [This product works on broadleaf weeds by speeding up their growth, the new tissues block the food transport system (phloem), certain parts of the plants starve e.g., the roots, and the plants die. It kills grassy weeds by "looking like" the essential plant nutrient phosphate — it is absorbed and moved around inside plants as if it were phosphate — but since it isn't phosphate, it can't be utilized by the plants and grassy weeds die.]

	Do not allow people (other than applicator) or pets on treatment area during application or until grass has dried.
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KILLS [CONTROLS]		
	Annual yellow sweetclover	Daisy, English
	Aster	Daisy, fleabane
	Austrian fieldcress	Daisy, oxeye
	Barryardgrass	Dallisgrass
	Bedstraw	Dandelion
	Beggarticks	Dichondra
	Betony, Florida	Dogbane
	Bindweed, field	Dogfennel
	Bird vetch	Dollarweed
	Bitter wintercress	Elderberry
	Bittercress, hairy	False dandelion
	Bitterweed	False flax
	Black-eyed Susan	False sunflower
	Black medic	Fiddleneck
	Black mustard	Florida pusley
	Blackseed plantain	Frenchweed
	Blessed thistle	Galinsoga
	Bloodflower	Goathead
	milkweed	Goldenrod
	Blue lettuce	Goosegrass
	Blue vervain	Ground ivy
	Bracted plantain	Gumweed
	Brassbuttons	Hairy fleabane
	Bristly oxtongue	Hawkweed
	Broadleaf dock	Healall
	Broadleaf plantain	Heartleaf drymary
	Broomweed	Heath aster
	Buckhorn	Hedge bindweed
	Buckhorn plantain	Hedge mustard
	Bulbous buttercup	Hemp
	Bull thistle	Henbit
	Bullnettle	Hoary cress
	Burclover	Hoary plantain
	Burdock	Hoary vervain
	Burning nettle	Horsenettle
	Burweed	Jimsonweed
	Buttercup	Johnsongrass
	Buttonweed	Knawel
	Canada thistle	Knotweed
	Carolina geranium	Kochia
	Carpetweed	Lambsquarters
	Catchweed	Lespedeza
	bedstraw	Mallow
	Catnip	Matchweed
	Catsear	Mexicanweed
	Chickweed, common	Milk vetch
	Chickweed, mouseear	Momingglory
	Chicory	Mouseear
	Cinquefoil	hawkweed
	Clover, crimson	Mugwort
	Clover, hop	Musk thistle
	Clover, red	Mustard
	Clover, strawberry	Narrowleaf plantain
	Clover, sweet	Narrowleaf vetch
	Clover, white	Nettle
	Cockle	Nutgrass/Nutsedge
	Cocklebur	Orange hawkweed
	Common mullein	Oxalis
	Crabgrass	Parsley-piert
	Creeping charlie	Parsnip
	Creeping jenny	Pearlwort
	Cudweed	Pennycress
	Curly dock	Pennywort
		Peppergrass
		Pepperweed

Continued in next column

KILLS LIST continued		
KILLS [CONTROLS]		
	Pigweed	Strawberry, India
	Pineywoods	mock
	bedstraw	Tall nettle
	Plains coreopsis (tickseed)	Tall vervain
	Plantain	Tansy mustard
	Poison ivy	Tansy ragwort
	Poison oak	Tanweed
	Pokeweed	Thistle
	Poorjoe	Trailing crownvetch
	Prairie sunflower	Tumble mustard
	Prickly lettuce	Tumble pigweed
	Prickly sida	Velvetleaf
	Prostrate knotweed	Venice mallow
	Prostrate pigweed	Virginia buttonweed
	Prostrate spurge	Virginia creeper
	Prostrate vervain	Virginia
	Puncturevine	pepperweed
	Purslane, common	Water pennywort
	Ragweed	Wavyleaf bulthistle
	Red sorrel	Western clematis
	Redroot pigweed	Western salsify
	Redstem filaree	White mustard
	Rough cinquefoil	Wild aster
	Rough fleabane	Wild buckwheat
	Russian pigweed	Wild carrot
	Russian thistle	Wild four-o'clock
	Sandbur	Wild garlic
	Scarlet pimpernel	Wild geranium
	Scotch thistle	Wild lettuce
	Sheep sorrel	Wild marigold
	Shepherdspurge	Wild mustard
	Slender plantain	Wild onion
	Smallflower	Wild parsnip
	galinsoga	Wild radish
	Smooth dock	Wild rape
	Smooth pigweed	Wild strawberry
	Sorrel	Wild sweet potato
	Sowthistle	Wild vetch
	Spanishneedles	Woodsorrel
	Speedwell	Woolly croton
	Spiny amaranth	Woolly
	Spiny cocklebur	momingglory
	Spiny sowthistle	Woolly plantain
	Spotted catsear	Wormseed
	Spotted spurge	Yarrow
	Spurweed	Yellow rocket
	Stinging nettle	Yellowflower
		pepperweed
		and other broadleaf
		weeds

IMPORTANT: Directions for Storage and Disposal

Storage Conditions: Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet. Protect from freezing.

- Disposal:**
- Do not reuse empty container.
 - Rinse the empty product container thoroughly and disperse the rinse water on weeds as part of application.
 - Place in trash.

Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state and local guidelines.

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

WARNING

- Causes substantial but temporary eye injury.
- Do not get in eyes or on clothing.
- Harmful if absorbed through skin.
- Avoid breathing spray mist.
- Avoid contact with skin.
- When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves, and eye protection.

After using this product and before eating, drinking, chewing gum, or using tobacco:

- Rinse gloves before removing.
- Wash hands thoroughly with soap and water.
- IF product gets on clothing, remove clothing as soon as possible and launder separately before reuse.

FIRST AID +	
IN CASE OF ACCIDENTAL...	IMMEDIATELY...
Contact with eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Skin Contact	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
Swallowing	<ul style="list-style-type: none"> • 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 do so by a poison control center or doctor. • Do not give anything to an unconscious person.

NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. You may call toll-free 877-229-3763 for medical emergency information. Active Ingredients: 18.00% Monosodium acid methanearsonate [CAS # 2163-80-6], 5.83% 2,4-D, dimethylamine salt [CAS # 2008-39-1], 2.93% Mecoprop-p, dimethylamine salt [CAS # 66423-09-4], and 1.46% Dicamba, dimethylamine salt [CAS#2300-66-5].

ENVIRONMENTAL HAZARDS

- This product is toxic to aquatic invertebrates. Do not apply directly to water.
- Do not contaminate water when disposing of equipment washwater or rinsate.
- Drift or runoff may harm fish and plants.
- Do not apply in windy conditions.

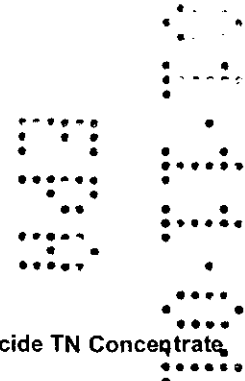
Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

NOTICE: Research and testing have determined that the "Directions For Use" are appropriate for the proper use of LAWN HERBICIDE TN CONCENTRATE under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

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Distributed by:
Bayer-Pursell, LLC
1500 Urban Center Drive
Birmingham, AL 35242



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