

72680-1

09/02/2003

1/3



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

SEP 2 2003

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dr. Alberto R. Quisumbing  
UPM Corporation  
28 Garrett Avenue  
Rosemont, PA 19010

Dear Dr. Quisumbing:

Subject: Vine-X Vine and Brush Control  
EPA Registration Number 72680-1  
Application dated August 20, 2003

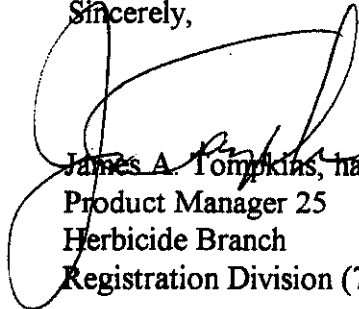
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

1. Add the following text to Environmental Hazards section:  
"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."
2. Add the following text to Directions for Use:  
"Do not allow people or pets to Contact the treated area until applications have dried."
3. Add the following text to Directions for Use, under the subheading "Application Restrictions":  
"Avoid contact with eyes, skin, or clothing during and after application."  
"Do not apply this product in a way that will contact any person or pet. Keep people and pets out of the area during application."
4. Add the following text under Application Restrictions, in a box:  
"User Safety Recommendations"
  - "Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet."
  - "Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing."
  - "Users should remove protective clothing and equipment immediately after handling this product. Wash the outside of gloves before removing. Keep and wash protective clothing and equipment separately from other laundry."

5. Change skin sensitizer statement to "This product may cause skin sensitization in some people" under Precautionary Statements.
6. Change "Storage" to "Pesticide Storage" under STORAGE AND DISPOSAL.
7. Add "Non-porous rubber gloves to "wear long-sleeved shirt and long pants, shoes and socks" under Precautionary Statements.

Submit three (3) copies of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Tompkins", is written over the typed name and title.

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



Keep Out Of Reach Of Children

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed; wear long-sleeved shirt and long pants, shoes and socks. Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals. Wash hands before eating, drinking, chewing gum, or using the toilet.

Table with 2 columns: Hazard (e.g., If swallowed, If on skin or clothing) and First Aid instructions (e.g., Call a poison control center or doctor immediately for treatment advice).

Environmental Hazards: This product 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.

Physical or Chemical Hazards: Combustible: Do not store or use near heat or open flame. Do not smoke when using this product.

Storage and Disposal: Do not contaminate water, food, or feeds by storage or disposal. Open dumping is prohibited.

Storage: Store container upright above 29°F, or agitate before use. Keep out of reach of children in a cool, dry area away from heat or open flame.

Container Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or toll-free 1-800-CLEANUP for disposal instructions.

DISCLAIMER: When used in strict accordance with the manufacturer's specifications this product is reasonably fit for the purposes stated on the label.

Registered for: UPM Corporation, 28 Garrett Ave, Rosemont, PA 19010, USA. EPA Reg. No. 72890-1, EPA Est. 071026-AH-001.

WOODY PLANTS & VINES CONTROLLED

Vine-X will control most common invasive vine & brush species including: Alantus, Ash, Birch, Blackberry, Box Elder, Brazilian Pepper, Choke Cherry, Cottonwood, Elderberry, Elm, Honeylocust, Kudzu, Locust, Mimosas, Mimosa, Oak, Persimmon, Poison Ivy, Poison Oak, Raspberry, Sassafras, Sweet Gum, Trumpet Creeper, Virginia Creeper, Wild Grape, Wild Rose, and more.

RECOMMENDED COVERAGE AREA

Individual circumstances will vary, but under typical residential garden situations one (1) bottle of Vine-X is recommended to control vines & brush over approximately 1/2 to 1 full acre of ground.

A CONSTANT PROBLEM

Nuisance vines and brush pests represent a constant threat to a well-ordered garden. When these weeds take root near valuable ornamental & vegetable plants, the problem can become even more difficult to handle.

THE VINE-X SOLUTION

Used for years by vegetation control professionals, the herbicide in Vine-X is different from any other now in use. Unlike typical water-based sprays which must be applied over large areas of foliage to work effectively, Vine-X's unique herbicide is formulated in a special vegetable oil base which actually penetrates the water-proof outer layer of the bark of undesirable vines & brush pests.

ZERO WASTE = MONEY SAVED!

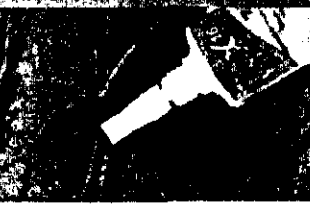
Because Vine-X is applied by contact directly to the stem of a problem plant, virtually no product is lost through airborne transmission; while oil sprays and foamer waste some of their contents even when used properly.

YEAR-ROUND USE

Vine-X's multi-seasonal use capability means that problem plants may be targeted even before foliage appears! This makes them even easier to find and treat, and avoids the risk of contact with toxic leaves of species like poison ivy and poison oak.

FOR MORE INFORMATION

To obtain more information about Vine-X, including Materials Data Safety Sheet, Frequently Asked Questions, extended species controlled list, and more, please visit our website at: www.vine-x.com.



A ready-to-use herbicide for the control of vines, brush, and woody plants wherever spraying is not practical.

SPECIAL FEATURES:

- Penetrating formula goes right through bark!
No risk to garden plants from overspray or mist!
Multi-seasonal - use at almost ANY time of year!
No wasted product - better VALUE than sprays!

Table with 2 columns: Ingredient (e.g., Thiopyr, 3,5,6-trichloro-2-pyridinylacetic acid) and Percentage (e.g., 13.6%).

KEEP OUT OF REACH OF CHILDREN

CAUTION: See box panels for directions and precautionary statements.

NET CONTENTS: 16 FL. OZ.

THE VINE-X ADVANTAGES

Here are just some of the features that give Vine-X the clear advantage when compared with other products often used for the same purpose.

Comparison table between Vine-X and other products (water-based, oil-based, granular) across various attributes like Penetrating Formula, Pre-emptive Application, No Stems Damaged, and Longest Product Residual.

For best value, always select the right product for the right task. For invasive vines & brush in hard-to-spray places, use the same formula that professionals have used for years: new Vine-X.

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.

To help avoid skin contact, wear non-porous rubber gloves when using this product or handling treated plants.

Do not apply this product in a way that will contact any person or animal.

Hold bottle upright and away from face. Unscrew overcap and lift straight up to remove. Twist valve stem counterclockwise to open, apply brush to area of stem or trunk nearest to ground, then squeeze bottle gently to start flow. Glide along in a steady motion to cover at least 6" to 12" of main stem or trunk up to 1/2 inch in diameter, and 5" more for every additional half inch in diameter.



ACCEPTED with COMMENTS in EPA Letter Dated

SEP 2 2003

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

72680-1