

73342-4

7/17/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Rebecca M. Horton, Agent for  
Ambrands  
Registration by Design, Inc.  
118 1/2 East Main Street, Suite 1  
Salem, VA 24153—3805

JUL 17 2009

SUBJECT: Application for Pesticide Notification (PRN 98-10)

Request Alternate Brand Name "IMAGE Ready-to-Spray Herbicide  
Concentrate" and General Label Changes (Marketing Claims)  
EPA Reg. No. 73342-4  
Application Dated June 8, 2009

Dear Ms. Horton:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 06/08/09 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 73342-4	2. EPA Product Manager Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMAGE® Herbicide Consumer Concentrate	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Ambrands 2030 Powers Ferry Road, Ste. 370, Atlanta, GA 30339  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>NOTIFICATION</u> Product Name <u>JUL 17 2009</u>	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)  
 Notification of administrative label changes: (1) Additional Brand Name - IMAGE Ready-to-Spray Herbicide Consumer Concentrate; (2) Optional Marketing Statements; (3) updated company address and (2) revised emergency contact phone number.  
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. Ambrands understands that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA, and further understands that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and Ambrands may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 PT / 24 FLOZ / 1 QT		5. Location of Label Directions <input checked="" type="checkbox"/> on label/attached booklet	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Rebecca M. Horton		Title Consultant/Agent for AMBRANDS		Telephone No. (Include Area Code) 540-375-8826	
<p align="center"><b>Certification</b></p> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Rebecca M. Horton</i>			3. Title Consultant/Agent for AMBRANDS		
4. Typed Name Rebecca M. Horton			5. Date June 8, 2009		

# Registrations by Design, Inc.™

118½ East Main Street  
Suite 1  
Salem, VA 24153-3805  
phone 540.375.8826  
fax 540.375.8827

CERTIFIED MAIL #7008 1140 0001 7211 2209  
June 8, 2009

Document Processing Desk (NOTIF)  
Office of Pesticide Programs/Registration Division (7504P)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: Notification of Administrative Label Changes  
EPA Reg. No. 73342-4, IMAGE® Herbicide Consumer Concentrate

Attn: Linda Arrington, Team Leader  
Notifications & Minor Formulations

On behalf of Ambrands of Atlanta, Georgia, enclosed is notification of the following administrative label changes for the above pesticide product:

- (1) Additional Brand Name: IMAGE® Ready-to-Spray Herbicide Consumer Concentrate
- (2) Optional Marketing Statements consistent with currently approved label claims
- (3) Revised/updated emergency contact telephone number
- (4) Updated company address (suite number change only)

The following documents are enclosed:

- 1) EPA Form 8570-1, Application for Pesticide – Notification (2 copies)
- 2) Copy of the revised label with areas of revision highlighted in blue.

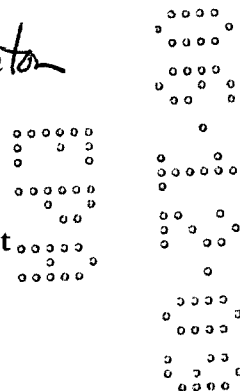
If further action or information is required on Ambrands' behalf, please advise.

Best regards,



Rebecca M. Horton  
Consultant/Agent for  
AMBRANDS

e-mail: [hortonb@ntelos.net](mailto:hortonb@ntelos.net)



/bmh  
Enclosures

Established  
1996



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

**CAUTION**

Harmful if inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets out of the treated area until sprays have dried.

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call (800) 265-0761 for emergency medical information.

**If inhaled** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

**If on skin or clothing** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**If in eyes** Hold eye open and rinse slowly and gently with water for 15-20 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.

**ENVIRONMENTAL HAZARDS**

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

**DIRECTIONS FOR USE**

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown on golf courses or lawns and grounds.

Observe all cautions and limitations on this label. The use of IMAGE Consumer Concentrate not consistent with this label may result in plant injury. Keep container closed to avoid spills and contamination.

**Storage & Disposal**

**Pesticide Storage:** KEEP FROM FREEZING. Do not store below 32°F. Store in a cool, dry place inaccessible to children or pets.

**Pesticide Disposal:** *If partially filled* — Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

### GENERAL INFORMATION

IMAGE Consumer Concentrate selectively kills (controls) tough weeds like purple and yellow nutsedge, wild onion and garlic, dollarweed, annual bluegrass, and others as listed. It can be used to kill (control) weeds in bermudagrass, St. Augustinegrass, buffalograss, centipedegrass, or zoysiagrass lawn and also in certain landscape ornamentals and groundcovers (see KILL (CONTROL) OF WEEDS IN ORNAMENTALS). IMAGE is mainly absorbed by the roots of sprayed weeds and is translocated throughout the weed to provide complete kill. Complete kill should occur in 3-5 weeks.

[Note to EPA: to include graphics demonstrating weed kill]

1. IMAGE is absorbed into the weed directly after application
2. Weed is yellow and wilted in 1-2 weeks
3. Weed is dead in 3-5 weeks

### MIXING INSTRUCTIONS

APPLICATION METHOD			USE RATE
Trigger or Pump-up Sprayer			
[graphic of trigger sprayer]	[graphic of pump-up sprayer]	Spot Weed Treatment	Mix 2.5 fl. oz. (5 Tablespoons) in 1 gal. of water. [2 teaspoons in 16 fl. oz.]. Spray to wet.
		Large Area Treatment	Mix 0.8 fl. oz. (1-1/2 Tbs.) in 1 gallon of water to cover 200 sq. ft.
Hose-end Sprayers			USE RATE
[graphic of hose-end sprayer]			Use at the rate of 24 oz. Image to cover 6,000 sq. ft. of lawn. Apply in sufficient water (i.e. 5 gallons per 1000 sq. ft.) to insure adequate coverage.
For ORTHO® Dial 'n Spray®, pour 24 oz. Image into jar, set metering dial at 4 tsp. and uniformly apply until jar is empty over 6,000 sq. ft.			
Ortho® and Dial 'n Spray® are registered trademarks of OMS Investments, Inc.			

(Optional Hose-end Ready Spray)

Apply at the rate of 24 oz. Image to cover 6,000 sq. ft. of lawn [hose-end ready spray graphic]  
(1 quart Image to cover 8000 sq. ft.)

1. Make sure knob control lever is in the OFF position. Shake well and attach to hose.
2. Turn water on at faucet, aim nozzle toward lawn and turn control lever to ON to begin spraying. The product will automatically siphon and mix with water.
3. When finished, turn control lever to OFF position. Turn faucet off. Discharge residual water pressure by turning control lever ON and OFF again.

### APPLICATION INSTRUCTIONS

- Wear long-sleeved shirt, long pants, shoes and socks when applying this product.
- Use only on well-established, non-stressed, labeled lawngrasses with a dense and uniform stand. TEMPORARY YELLOWING MAY OCCUR.
- Water in within 1-7 days after application to wash the IMAGE into the root zone where the greatest weed control activity occurs.
- For difficult to kill weeds, a second application can be made 6 weeks after the initial application.
- For best results, do not mow immediately before or for 48 hours after application.
- IMAGE may injure tall fescue. Do not use on tall fescue when it is used as a desirable turfgrass.
- Wait at least 1½ months after treatment before reseeding, winter overseeding, or plugging lawns.
- Not for use on newly planted or plugged lawns – nor on winter overseeded lawns, such as ryegrass, when the overseeded grass is desirable.

- Avoid application to soil where annual bedding plants may be planted the following year, or plant injury may result.
- Try to avoid overlaps when spraying. Apply only when wind is no more than 10 mph.
- Avoid drift onto vegetables, flowers and unlabeled ornamental shrubs and plants as injury may result.
- Do not graze or feed treated grass clippings. Do not apply in vegetable gardens.
- Do not apply in greenhouses.

KILL [CONTROL] OF SUMMER WEEDS		
To kill	yellow nutsedge	purple nutsedge
[sun graphic]	annual sedge*	green kyllinga
	rice flatsedge	globe sedge
	dollarweed*	violets*
	Virginia buttonweed*	field sandbur
	crabgrass*	bahiagrass*
	perennial ryegrass	tall fescue

Do not apply during the cooler winter months when turf and weeds are not actively growing. Do not apply just prior to or during transition or during periods of very slow turf growth or severe discoloration could occur.

\*More than one application may be needed.

KILL [CONTROL] OF WINTER WEEDS		
To kill	annual bluegrass*	hairy bittercress
[snowflake graphic]	( <i>Poa annua</i> )	lawn burweed
	tall fescue	red sorrel
	common chickweed	wild onion
	cutleaf evening primrose	perennial ryegrass
	dovetail geranium	buttercup
	knawel	cudweed
	purple deadnettle	Carolina geranium
	wild garlic	henbit
	black medic	parsley-piert
	mouseear chickweed	white clover
	dandelion*	

Time applications to follow the first killing frost. IMAGE may be applied prior to or soon after emergence of the weeds listed with the exception of wild onion and wild garlic which must be emerged at application time for control. DO NOT USE ON ST. AUGUSTINEGRASS FOR WINTER WEED CONTROL or other labeled turfgrasses that do not go dormant.

\*More than one application may be needed.

**KILL (CONTROL) OF WEEDS IN ORNAMENTALS AND GROUND COVERS**

IMAGE is effective in killing (controlling) the listed weeds in established landscape plantings. Apply IMAGE spray solution to the area where weeds occur. Applications should only be made over the top of or around the listed ornamentals. APPLICATION TO THE FOLIAGE OR ROOT ZONE OF UNLABELED ORNAMENTALS, PERENNIALS, OR ANNUAL BEDDING PLANTS MAY RESULT IN SEVERE PLANT INJURY. Use only on well-established, non-stressed plants. Ornamentals which are known to be severely injured by IMAGE include azalea, ligustrum (privet), viburnum, pieris, azelia and roses.





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Mondograss	( <i>Ophiopogon japonicus</i> )
Hosta 'Lancifolia'	( <i>Hosta</i> sp.)
Society Garlic	( <i>Tulbaghia violacea</i> )

[In case of an emergency endangering life or property involving this product, call day or night, Area Code 800-265-0761.]

[For more information, please visit our website at [www.imageforweeds.com](http://www.imageforweeds.com).]

NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

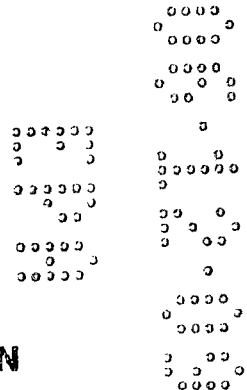
Image and Ambrands are registered trademarks of Central Garden & Pet.



Manufactured for:

**Ambrands**  
2030 Powers Ferry Road, Ste. 370  
Atlanta, GA 30339

[Batch Code to be inserted at production.]



**NOTIFICATION**

JUL 17 2009

EPA Reg No. 73342-4

EPA Est. No. 5905-GA-01<sub>A</sub>, 2217-KS-02<sub>B</sub>

Subscript used is first letter of Run Code on Container.

June 8, 2009 – Notification

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