73342-4

09/07/2011



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

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

SEP 7 2011

Ms. Rebecca M. Horton Agent Of Ambrands P.O. Box 1019 Salem, VA 24153

Subject: Notification For IMAGE® Herbicide Consumer Concentrate (EPA Reg. No. 73342-4).

Ms. Horton:

The Agency is in receipt of your Application, dated July 19, 2010, for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the product IMAGE® Herbicide Consumer Concentrate (EPA Reg. No. 73342-4). The Registration Division (RD) has conducted a review of this request for its applicability under PRNs 98-10, and finds that the action requested fall within the scope of PRNs 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

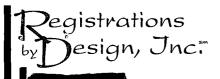
If you have any questions, please contact Phil Errico at 703-305-6663/ errico.philip@epa.gov.

Sincerely,

Kable Bo Davis PM-25 Herbicide Branch/Registration Division (7505P) Office of Pesticide Programs

€EPA	Environment _{Wes}	hington, DC 2046	60		✓ A	egistrati mendm ther		OPP Iden	tifier Number
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. Company/Product Na 73342-4	umber		1	Product Man opkins	nager			posed Clas	
, Company/Product (N IMAGE® Herbicide	lame) Consumer Concentrate	e	PM# Team					None	Restricted
Ambrands	of Applicant <i>(Include ZIP (</i> rry Road, Ste. 370, A		(b)(i), i to:		is simila	r or identic	al in con	nposition	ction 3(c)(3) and labeling
Check .	if this is a new address		Produ	uct Name					
			Section -	11	-				
Amendment - E	xplain below. h response to Agency lette	er dated		Final printe Agency let "Me Too"	ter dated	n repsonse t			
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Notification - Ex	cplain below.			Other - Exp	Nain Délov		SEP -	7 2011	
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EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.



phone 540.375.8826 fax 540.375.8827 CERTIFIED MAIL #7010 0780 0000 9763 2233 July 19, 2010 3

0.16. See letter 4/12/11

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

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

Attn: Jim Tompkins, PM Team 25

On behalf of Ambrands of Atlanta, GA, enclosed is notification to amend the above herbicide label. As currently registered, the label is approved for use to kill dandelion, common chickweed and white clover – identified as "winter" weeds. These weeds commonly occur into and throughout the summer months; therefore, this notification is submitted to include their listing under the "summer" weed section of the label.

Alternative hose-end sprayer use instruction is also added at this time, to allow for variation in hose-end sprayer packaging.

All areas of revision are highlighted for your convenience in review.

The following documents are enclosed:

- 1) EPA Form 8570-1, Application for Pesticide Notification (2 copies)
- 2) Copy of the revised label

Best regards,

Riberca M. Horth

Rebecca M. Horton Consultant/Agent for AMBRANDS e-mail: hortonb@ntelos.netgeccccc

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/bmh Enclosures

Mailing address: P.O. Box 1019, Salem, VA 24153

Federal & State Pesticide/Fertilizer Registration Services *plus* typesetting/design of product labeling

Established 1996

IMAGE[®] Herbicide Consumer Concentrate

[Additional Brand Name(s): IMAGE® Ready-to-Spray Herbicide Consumer Concentrate]

 Optional Marketing Statements:

 Kills Nutsedge

 Nutsedge Killer

 Kills Really Tough Weeds [in Lawns]

 [Also] Kills Dollarweed, Wild Onion, Sandbur, Annual Bluegrass

 ONE PINT TREATS 4,000 SQUARE FEET

 24 FL. OZ. TREATS 6,000 SQUARE FEET

 32 FL. OZ. TREATS 8,000 SQUARE FEET

NOTIFICATION

SEP - 7 2011

6666 6666

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A Selective Herbicide for Use	in Established:
Bermudagrass	St. Augustinegrass
Buffalograss	Zoysiagras
Centipedegrass	And Selected Landscape Ornamentals and Groundcovers

CONTROLS NUTSEDGE Wild Onion and Sandbur

Optional Marketing Statements (when packaged in RTS applicator): Connect and Spray Applicator Treats 8,000 sq ft.

[Note to EPA: Front panel marketing label may include graphics representing product use; e.g., pictures with names of weeds such as nutsedge, dollar weed, annual bluegrass (poa annua), wild onion and garlic]

ACTIVE INGREDIENT:

Ammonium salt of imazaquin (2-[4,5-dihydro-4-methyl-4(1-methylethyl)-5-oxo-	
1 <i>H</i> -imidazol-2-yl]-3-quinolinecarboxylic acid)*	3.3%
OTHER INGREDIENTS	<u>96.7%</u>
TOTAL	100.0%

*Equivalent to 3.14% 2-[4,5-dihydro-4-methyl-4(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3quinolinecarboxylic acid.(1 pint contains 0.0375 pounds of active ingredient as the free acid)

KEEP OUT OF REACH OF CHILDREN CAUTION!/;PRECAUCION!

See Back [Inside/Side/Other Panel] for Additional Precautionary Statements and First Aid. (See inside for additional Precautionary Statements, First Aid, and complete Directions For Use.)

Net Contents:

EPA Reg No. 73342-4

EPA Est. No. 5905-GA- 01_A , 2217-KS- 02_B , 59144-GA- 1_C Subscript used is first letter of Run Code on Container. Page 1 of 6 Pages

July 19, 2010 – Notification

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
•	ict container or label with you when calling a poison control center or doctor, or going for a 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
[nose graphic]	ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
[hand/shirt graphic]	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.
[eye graphic]	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.

July 19, 2010 – Notification

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 Trigger or Pump-up Sprayer			USE RATE
		Spot	Mix 2.5 fl. oz. (5 Tablespoons) in 1 gal.
[graphic of	[graphic of	Weed	of water. [2 teaspoons in 16 fl. oz.]. Spray
trigger	pump-up	Treatment	to wet.
sprayer]	sprayer]	Large Area	Mix 0.8 fl. oz. (1-1/2 Tbs.) in 1 gallon of
		Treatment	water to cover 200 sq. ft.
	Hose-end Spray	yers	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.
	Dial 'n Spray [®] , pour 2 y over 6,000 sq. ft.	24 oz. Image into jar, s	set metering dial at 4 tsp. and uniformly apply

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.

(Alternate Hose-end Sprayer Directions for applicable packaging)

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 the handle is in the upright position and locked **OFF** position. Shake container well and attach spray nozzle to hose.

2. Turn water on at faucet, aim nozzle toward lawn, bend tab back, and rotate handle

clockwise towards the hose connection in the ON position to begin spraying. The product will automatically siphon and mix with water.

3. When finished turn the handle counterclockwise until the handle is in the upright position and locked position. Turn faucet off. Discharge residual water pressure by turning the handle ON and OFF again. Unscrew spray nozzle from hose.

EPA Reg No. 73342-4

EPA Est. No. 5905-GA- 01_A , 2217-KS- 02_B , 59144-GA- 1_C Subscript used is first letter of Run Code on Container. Page 3 of 6 Pages

July 19, 2010 - Notification

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 weeks, 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 1¹/₂ 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 [CONTRO]	L] OF SUMMER WEEDS	
To kill	yellow nutsedge	purple nutsedge	
	annual sedge*	green kyllinga	
[sun graphic]	rice flatsedge	globe sedge	
	dollarweed*	violets*	
	Virginia buttonweed*	field sandbur	
	crabgrass*	bahiagrass*	
	perennial ryegrass	tall fescue	
	common chickweed	dandelion*	
	white clover		

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	
	(Poa annua)	lawn burweed	
[snowflake	tall fescue	red sorrel	
graphic]	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

EPA Reg No. 73342-4

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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, abelia and roses.

Indian Hawthorne	(Raphiolepis indica)	
Dwarf Yaupon Holly 'Schillings Dwarf'	(<u>Ilex vomitoria</u>)	
Blue Pfitzer Juniper 'Pfitzeriana Glauca'	(Juniperus chinensis)	
Helleri Holly 'Helleri'	(<u>Ilex crenata</u>)	
Red Tip Photinia	(<u>Photinia</u> X <u>fraseri</u>)	
Уисса	(<u>Yucca pendula</u>)	
Wax Myrtle	(<u>Myrica cerifera</u>)	
Burford Holly 'Burfordii'	(<u>Ilex cornuta</u>)	
Gardenia 'Miami Supreme'	(<u>Gardenia jasminoides</u>)	
Flame of the Woods	(<u>Ixora coccinea</u>)	
Confederate Jasmine	(<u>Trachelospermum jasminoides</u>)	
Parsons Juniper 'Parsoni'	(Juniperus conferta)	
Blue Pacific Juniper 'Blue Pacific'	(<u>Juniperus conferta</u>)	
Blue Rug Juniper 'Wiltonii'	(Juniperus horizontalis)	
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IMAGE CAN BE APPLIED TO THE FOLLOWING ORNAMENTALS:

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Red Crape Myrtle	(Lagerstroemia indica)
Asiatic Jasmine 'Minima'	(<u>Trachelospermum asiaticum</u>)
Giant Liriope 'Evergreen Giant'	(<u>Liriope muscari</u>)
Variegated Liriope 'Silvery Sunproof'	(<u>Liriope muscari</u>)
Pachysandra	(<u>Pachysandra terminalis</u>)
Mondograss	(Ophiopogon japonicus)
Hosta 'Lancifolia'	(<u>Hosta</u> sp.)
Society Garlic	(<u>Tulbaghia violacea</u>)

[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.]

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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.

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