

73342-4

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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,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis PM-25
Herbicide Branch/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 J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMAGE® Herbicide Consumer Concentrate	PM# Team 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. _____ Product Name _____	

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.

NOTIFICATION

SEP - 7 2011

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION to repeat currently labeled particular winter application weed species for summer application and provide alternative hose-end sprayer use directions for applicable packaging.
 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
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				<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 1PT, 24FLOZ, 1QT	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) 540-875-8826
Certification 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 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 July 19, 2010	

**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.

[nose graphic] **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.

[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.

[eye graphic] **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.

(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.

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
	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
[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, abelia and roses.

IMAGE CAN BE APPLIED TO THE FOLLOWING ORNAMENTALS:

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

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

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.

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Manufactured for:

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

[Batch Code to be inserted at production.]

Made in USA