82052-1 7/1/2010 1 of 13

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

JUL 1 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Susan MacIntosh
MacIntosh & Associates, Inc.
Agent for Cutting Edge Formulations, Inc.
1203 Hartford Ave
Saint Paul, MN 55116-1622

Subject: Avenger Weed Killer Concentrate
EPA Reg. No. 82052-1
Notification application dated June 7, 2010
Conversion to label amendment of June 28, 2010

Dear Ms. MacIntosh:

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) Revise the Sublabel A title to "Residential and Garden Use"
2) Add appropriate Net Contents information to the label

Submit one (1) copy 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. If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,

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

MASTER LABEL:

AVENGER
WEED KILLER CONCENTRATE

ACTIVE INGREDIENT:

d-limonene (citrus oil)	70%
INERT INGREDIENTS	30%
TOTAL	100%

SUBLABEL A: Home and Garden Use
SUBLABEL B: Commercial Use

KEEP OUT OF REACH OF CHILDREN

CAUTION

Net Contents: _____

EPA Reg. No. 82052-1
EPA Est. No. 82052-GA-1

Manufactured by: Cutting Edge Formulations, Inc.
3057 Summer Oak Place, Buford, Georgia 30518
(866) 906-WEED www.AvengerWeedKiller.com

ACCEPTED
with COMMENTS
in EPA Letter Dated
JUL - 1 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.
82052-1

SUBLABEL A: Home and Garden Use

AVENGER
WEED KILLER CONCENTRATE

ACTIVE INGREDIENT:

d-limonene (citrus oil)	70%
INERT INGREDIENTS	30%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional Precautionary Statements and First Aid

FOR ORGANIC GARDENING *[or]* FOR ORGANIC PRODUCTION

OMRI™ Listed
Organic Materials Review Institute

[Front panel: optional marketing claims may be used on any panel]

Non-Selective: Controls most annual weeds, grasses & broadleaves
Kills most annual weeds, grasses & broadleaves
For Use on Borders Around Patios, Driveways and Sidewalks
For Use on Borders Around Driveways, Patios and Sidewalks, Around Mature Trees and Ornamentals, Around Buildings, In Residential Greenhouses, Fencerows and Around Flower Beds.
Fast Acting
Made from Oranges
Contains Citrus Oil
Clean Citrus Scent
Does not stain brick, concrete or pavement
Can Be Used Around Pets /Wildlife When Spray Has Dried
Weed Eliminator
Weed Killer
Spray weeds until thoroughly wet
Spray must appear white on weed
For Outdoor Use around the Home
Quick Visible Results

Makes up to ___ gallons
Patented formula
Made in the USA or depiction of USA flag
Satisfaction guaranteed or your money back

[Label may include graphic representation consistent with labeled product use: e.g., "before" and "after" illustrations of use on weeds.]

Net Contents: _____ FL OZ

EPA Reg. No. 82052-1 EPA Est. No. 82052-GA-1

Manufactured by: Cutting Edge Formulations, Inc.
3057 Summer Oak Place, Buford, Georgia 30518
(866) 906-WEED www.AvengerWeedKiller.com

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed though skin. Causes moderate eye-irritation. Avoid contact with skin, eyes or clothing.

FIRST AID	
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 lens, if present, after the first 5 minutes. Then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

USER SAFETY RECOMMENDATIONS

User should:
- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if product gets inside. Then wash thoroughly and put on clean clothing.

PHYSICAL AND CHEMICAL HAZARDS: Combustible. Do not use or store near heat or open flame.

ENVIRONMENTAL HAZARDS: Do not apply directly to water or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Product Information: Avenger Weed Killer is a broad spectrum weed killer that contains d-limonene. D-limonene is the citrus oil that is extracted from the rind of oranges. It is non-selective and controls most annual weeds, both grasses and broadleaves.

For best performance, **complete** coverage of target weeds is necessary. Spray until thoroughly wet. For use on non-crop areas, borders around driveways, patios and sidewalks, around mature trees and ornamentals, around buildings, in residential greenhouses, fencerows and around flower beds.

Avenger Weed Killer is fast acting with quick visible results. Foliar contact results in control of annual grasses and broadleaves and top growth reduction of deep rooted perennial weeds. Re-treatment may be required for control of perennial weeds or older, hardier weeds.

Keep children and pets out of the treated area until sprays have dried.

Environmental Conditions: Avenger Weed Killer is effective over a wide range of environmental conditions. Cool weather will slow the activity of Avenger Weed Killer, but should not affect its performance.

Allow heavy dew to evaporate prior to Avenger Weed Killer applications. Do not apply if windy conditions exist or a strong threat of rain is expected within 2 hours. Do not allow the herbicide solution to contact desirable vegetation as small amounts can cause severe damage to crops and other desirable plants.

Mixing of Avenger Weed Killer: Fill the spray tank ½ full with clean water. Add any other dry formulations then liquid formulations to the tank. Add Avenger Weed Killer while agitating. Then fill remainder with water.

Tank Mix Combination: When this product is used in combination with any other products, refer to the respective product labels for rates and methods of application, proper timing, restrictions and precautions.

Compatibility testing: If the compatibility with another product is not known, a jar test or physical compatibility study should be conducted before tank mixtures are made.
Do not apply this product through any type of irrigation system.

Application Instructions
Mix this product in clean water and apply to the foliage of vegetation to be controlled. Spray until thoroughly wet. NOTE: All contacted vegetation is affected. Avoid contacting desirable plants. Overspray or drift will injure or kill contacted vegetation. Do not spray on lawns – it will damage or kill treated grass.

Mixing Instructions		
To Control Small Annual Weeds (weeds less than 6 inches tall)	Large Annuals and Most Perennials	Hard to Kill Weeds
Add 1 Quart of Concentrate to 7 quarts of water to make 2 Gallons (8 quarts) of spray solution	Add 1 Quart of Concentrate to 5 quarts of water to make 1 ½ Gallons (6 quarts) of spray solution	Add 1 Quart of Concentrate to 3 quarts of water to make 1 Gallon (4 quarts) of spray solution

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.
Pesticide Storage: Store in a cool, dry place inaccessible to children and pets.
Pesticide Disposal: If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.
Container Disposal: If empty: Non-refillable container. Do not reuse or refill this container. Place is trash or offer for recycling if available.

Conditions of Sale and Warranty

The Directions For Use of this product reflects the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of factors such as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of Manufacturer, Distributor or the Seller. To the extent consistent with applicable law, all such risks are assumed by the Buyer.

SUBLABEL B: Commercial Use

AVENGER
WEED KILLER CONCENTRATE

ACTIVE INGREDIENT:

d-limonene (citrus oil)	70%
INERT INGREDIENTS	30%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FOR ORGANIC GARDENING *[or]* FOR ORGANIC PRODUCTION

OMRI™ Listed
Organic Materials Review Institute

[Front panel: optional marketing claims may be used on any panel]
Non-Selective: Controls most annual weeds, grasses & broadleaves
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Spray weeds until thoroughly wet
Spray must appear white on weed
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Quick Visible Results
Makes up to ___ gallons
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Satisfaction guaranteed or your money back

[Label may include graphic representation consistent with labeled product use: e.g., "before" and "after" illustrations of use on weeds.]

See back panel for additional Precautionary Statements and First Aid

Net Contents: _____ FL OZ

EPA Reg. No. 82052-1
EPA Est. No. 82052-GA-1

Manufactured by: Cutting Edge Formulations, Inc.
3057 Summer Oak Place, Buford, Georgia 30518
(866) 906-WEED www.AvengerWeedKiller.com

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed though skin. Causes moderate eye-irritation. Avoid contact with skin, eyes or clothing.

FIRST AID	
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If in Eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lens, if present, after the first 5 minutes. Then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

Personal Protective Equipment (PPE): Applications and other handlers must wear:

- Long sleeved shirt and pants
- Shoes plus socks
- Protective eyewear

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS
User should: • Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing immediately if product gets inside. Then wash thoroughly and put on clean clothing.

PHYSICAL AND CHEMICAL HAZARDS: Combustible. Do not use or store near heat or open flame.

ENVIRONMENTAL HAZARDS: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry to treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas (that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water), is:

- Long sleeved shirt and pants
- Shoes plus socks
- Protective eyewear

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. **Keep children and pets out of the treated area until sprays have dried.**

Product Information: Avenger Weed Killer is a broad spectrum weed killer that contains a citrus extract called d-limonene. D-limonene comes from the peel of oranges. It is non-selective and controls most annual weeds, both grasses and broadleaves.

Avenger Weed Killer is fast acting with quick visible results. For best performance, **complete** coverage of target weeds is necessary. Spray until thoroughly wet. For use on non-crop areas, borders around driveways, patios, roadsides and sidewalks, around mature trees and ornamentals, around building, in greenhouses containing non-food crops, fencerows and around flower beds.

Environmental Conditions: Avenger Weed Killer is effective over a wide range of environmental conditions. Cool weather will slow the activity of Avenger Weed Killer, but should not affect its performance.

Allow heavy dew to evaporate prior to Avenger Weed Killer applications. Do not apply if windy conditions exist or a strong threat of rain is expected within 2 hours.

Spray Drift Management: Do not allow the herbicide solution to contact desirable vegetation as small amounts can cause severe damage to crops and other desirable plants.

Mixing of Avenger Weed Killer: Fill the spray tank ½ full with clean water. Add any other dry formulations then liquid formulations to the tank. Add Avenger Weed Killer while agitating. Then fill remainder with water.

Tank Mix Combination: When used in combination with any other products, refer to the respective product labels for rates and methods of application, proper timing, restrictions and precautions. The most restrictive precautions and restrictions must be followed.

Compatibility Testing: If the compatibility with another product is not known, a jar test or physical compatibility study should be conducted before tank mixtures are made.
Do not apply this product through any type of irrigation system.

Application Instructions

Mix this product in clean water and apply to the foliage of vegetation to be controlled. Spray weeds until thoroughly wet. NOTE: All contacted vegetation is affected. Avoid contacting desirable plants. Overspray or drift will injure or kill contacted vegetation. DO NOT spray on lawns – it will damage or kill treated grass.

Mixing Instructions		
To Control Small Annual Weeds (weeds less than 6 inches tall)	Large Annuals and Most Perennials	Hard to Kill Weeds
Add 1 Quart of Concentrate to 7 quarts of water to make 2 Gallons (8 quarts) of spray solution	Add 1 Quart of Concentrate to 5 quarts of water to make 1 ½ Gallons (6 quarts) of spray solution	Add 1 Quart of Concentrate to 3 quarts of water to make 1 Gallon (4 quarts) of spray solution

Small annual weeds: for control of annual weeds less than 6 inches tall, a 1:7 ratio of Avenger Weed Killer to water; dilute 1 part of Avenger Weed Killer in 7 parts of water.

Larger annual and most perennial weeds: for annual weeds above 6 inches, use a 1:5 ratio of Avenger Weed Killer to water; dilute 1 part of Avenger Weed Killer in 5 parts of water.

Hard to control weeds: for harder to control weeds (for example, weeds with a thick cuticle such as ivy and hard to control perennials), use a 1:3 ratio of Avenger Weed Killer to water. Dilute 1 part of Avenger Weed Killer in 3 parts of water.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Pesticide Disposal: To avoid wastes, use all material in this container by application according

to label directions. If wastes cannot be avoided offer remaining product to a waste disposal facility or pesticide disposal program, (often such programs are run by state or local governments or by industry).

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Offer for recycling, if available, otherwise puncture and dispose of in a sanitary landfill or by incineration. Do not burn, unless allowed by state and local ordinances.

Conditions of Sale

The Directions For Use of this product reflects the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of factors such as weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling. All of which are beyond the control of Cutting Edge Formulations or the Seller. To the extent consistent with applicable law, all such risks are assumed by the Buyer.