

82052-3

1110612007

1/12



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

November 6, 2007

Mr. M. Olav Messerschmidt  
Agent for CUTTING EDGE FORMULATIONS, INC.  
OMC Ag Consulting  
5106 Bristol Industrial Way Suite 400  
Buford, GA 30518

Subject: Label Notification

Dear Mr. Messerschmidt:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 10/1/07 for **EPA Registration 82052-3**. The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact me directly at 703-305-6249 or Sherada Hobgood of my staff at 703-308-8893.

Sincerely,

A handwritten signature in black ink, appearing to be "L5/".

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



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

2/12

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> Other	OPP Identifier Number
--	---	---	-----------------------

**Application for Pesticide - Section I**

<b>1. Company/Product Number</b> 82052	<b>2. EPA Product Manager</b> James Tompkins	<b>3. Proposed Classification</b> <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
<b>4. Company/Product (Name)</b> Cutting Edge Formulations, Inc.	<b>PM#</b> 25	
<b>5. Name and Address of Applicant (Include ZIP Code)</b> Cutting Edge Formulations, Inc. 5106 Bristol Industrial Way Buford, GA 30515  <input type="checkbox"/> Check if this is a new address	<b>6. Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 82052 - 3  Product Name <u>Nature's Avenger Herbicide</u>	

**NOTIFICATION**  
NOV 06 2007

**Section - II**

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

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

Minor label changes: Instructions of assembling sprayer

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>					
<b>Child-Resistant Packaging</b>  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Unit Packaging</b>  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Water Soluble Packaging</b>  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>2. Type of Container</b>  <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
<b>* Certification must be submitted</b>		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container		
<b>3. Location of Net Contents Information</b>  <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		<b>4. Size(s) Retail Container</b> 1 pt, 1 qt, 1gal, 2.5 gal, 55 gall		<b>5. Location of Label Directions</b> <input type="checkbox"/> _____	
<b>6. Manner in Which Label is Affixed to Product</b> <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____					

**Section - IV**

<b>1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</b>			
<b>Name</b> M. Olav Messerschmidt	<b>Title</b> Consultant / agent	<b>Telephone No. (Include Area Code)</b> 517-881-0106	
<b>Certification</b> 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.			<b>6. Date Application Received (Stamped)</b>  _____
<b>2. Signature</b> 	<b>3. Title</b> Consultant / agent		
<b>4. Typed Name</b> M. Olav Messerschmidt	<b>5. Date</b> 10/1/2007		

3/1a



**Cutting Edge Formulations, Inc.**  
5106 Bristol Industrial Way, Suite 400  
Buford, GA. 30518

11/6

October 1, 2007

Mr. James Tompkins  
Herbicide Product Manager (PM 25)  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency (US EPA)  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Subject: Notification of Minor Label Changes**  
Nature's Avenger® Herbicide  
EPA Registration No. 82052 - 3

Dear Mr. Tompkins:

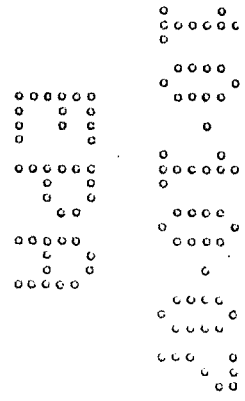
Attached is EPA form 8570-1 for a Notification to add optional instructions on how to assemble a sprayer system. One copy of the label with the changes highlighted is included. Also included are five (5) copies of labeling.

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. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand 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 I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please don't hesitate to contact me.

Sincerely,

M. Olav Messerschmidt  
OMC Ag Consulting



4/12

Nature's Avenger RTU  
Version-87  
Revised 082807100107

**Master Label:**

**NATURE'S AVENGER Herbicide**

ACTIVE INGREDIENT: d-limonene (citrus oil).....	17.5%
INERT INGREDIENTS:.....	<u>82.5%</u>
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

(See back/side/other panel(s) for additional precautionary statements and first aid.)

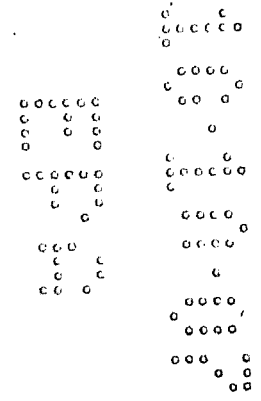
**SUBLABEL A:** Home and Garden Use

**SUBLABEL B:** Commercial Use

Net Contents: \_\_\_ FL OZ (\_\_\_ mL)

EPA Reg. No. 82052 - 3  
EPA Est. No. 82052-GA-1

**Manufactured by:**  
Cutting Edge Formulations, Inc.  
5106 Bristol Industrial Way  
Buford, GA 30518  
(678) 546-5009



**NOTIFICATION**

NOV 06 2007

5/12

Nature's Avenger RTU  
Version-87  
Revised 082807100107

**SUBLABEL A: Home and Garden Use**

# NATURE'S AVENGER Herbicide

ACTIVE INGREDIENT: d-limonene (citrus oil).....	17.5%
INERT INGREDIENTS:.....	82.5%
Total	100.0%

## KEEP OUT OF REACH OF CHILDREN CAUTION

(See back/side/other panel(s) for additional precautionary statements and first aid.)



For Organic Gardening [or]



For Organic Production



{Front panel: optional marketing claims may be used on any panel}

- Ready to Use (RTU)
- Non-selective: controls most weeds, grasses and broadleaves
- Can be used around pets and wildlife
- Contains citrus oil
- Clean citrus scent
- Made from oranges
- Weed eliminator
- For outdoor use around the home
- Patented formula
- Made in the USA
- Satisfaction guaranteed or your money back
- Does not stain brick, concrete, or pavement

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

6/12

[Optional Individual Sprayer Design Preparation Directions:]

• **Prepare Sprayer:**

1. Remove sprayer from bottle and remove shrink wrap
2. Remove plug from sprayer and pull cord out all the way
3. Remove tab from flip top cap
4. Open and insert plug into cap opening
5. Turn sprayer nozzle to selected pattern and follow directions for use

[Sprayer Directions may include graphics depicting use of the individual sprayer design.]

**SHAKE WELL BEFORE USING**

Net Contents: \_\_\_ FL OZ (\_\_\_ mL)

EPA Reg. No. 82052 - 3  
EPA Est. No. 82052-GA-1

**Manufactured by:**  
Cutting Edge Formulations, Inc.  
5106 Bristol Industrial Way  
Buford, GA 30518  
(678) 546-5009

7/12

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

Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Harmful if inhaled. Avoid breathing vapor. May cause eye or skin irritation. Wash thoroughly with soap and water after handling.

<b>FIRST AID</b>	
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted con detalle. (If you do not understand the label, find someone to explain it to you in detail.)	
<b>If on Skin or Clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in Eyes:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

**PHYSICAL AND CHEMICAL HAZARDS**

Combustible: Do not use or store near heat or open flame.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water. 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.

**SHAKE WELL BEFORE USING**

NATURE'S AVENGER is a broad spectrum weed killer that contains d-limonene. D-limonene is the citrus oil that is extracted from the rind of oranges. NATURE'S AVENGER is non-selective and controls most annual weeds, both grasses and broadleaves. It is recommended for non-food areas such as borders, driveways, patios, sidewalks, around mature trees and ornamentals, around building, in greenhouses, fencerows and around flower beds.

NATURE'S AVENGER 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 is required for control of perennial weeds. Spray until thoroughly wet. For best performance, **complete** coverage of target weeds is necessary.

8/12

**For Control of SMALL ANNUAL WEEDS:** apply NATURE'S AVENGER to the foliage of the small weeds (less than 6 inches) making sure leaves are thoroughly wet and uniformly covered. Do not apply if a strong threat of rain is expected within 2 hours.

**For Control of LARGER ANNUAL WEEDS and BURNDOWN of PERENNIAL WEEDS:** Larger annual weeds (more than 6 inches) and perennials are more difficult and may require re-treatment. Treat as described above.

Best results are obtained when applied to young, actively growing weeds. Weeds that are mature, dormant or hardened due to moisture stress are more resistant to herbicide treatment.

**NOTE: All contacted vegetation is affected. Avoid contacting desirable plants. Overspray or drift will injure or kill contacted vegetation.**

### **PESTICIDE STORAGE AND DISPOSAL**

**Storage:** Store in a cool, dry place inaccessible to children and pets.

**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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

### **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 Cutting Edge Formulations or the Seller. To the extent consistent with applicable law, all such risks are assumed by the Buyer.

To the extent consistent with applicable law, Cutting Edge Formulations warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above. To the extent consistent with applicable law, Cutting Edge Formulations makes no other express or implied warranty of fitness or merchantability or any other express or implied warranty. To the extent consistent with applicable law, shall Cutting Edge Formulations or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, Cutting Edge Formulations and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of Cutting Edge Formulations.



9/12

**SUBLABEL B: Commercial Use**

**NATURE'S AVENGER Herbicide**

ACTIVE INGREDIENT: d-limonene (citrus oil).....	17.5%
INERT INGREDIENTS:.....	82.5%
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

(See back/side/other panel(s) for additional precautionary statements and first aid.)



For Organic Gardening [or]



For Organic Production



*{Front panel: optional marketing claims may be used on any panel}*

- Ready to Use (RTU)
- Non-selective: controls most weeds, grasses and broadleaves
- Can be used around pets and wildlife
- Contains citrus oil
- Clean citrus scent
- Made from oranges
- Weed eliminator
- For outdoor use around the home
- Patented formula
- Made in the USA
- Satisfaction guaranteed or your money back
- Does not stain brick, concrete, or pavement

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

10/12

## SHAKE WELL BEFORE USING

Net Contents: \_\_\_ FL OZ (\_\_\_ mL)

EPA Reg. No. 82052 - 3  
EPA Est. No. 82052-GA-1

**Manufactured by:**  
Cutting Edge Formulations, Inc.  
5106 Bristol Industrial Way  
Buford, GA 30518  
(678) 546-5009

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Harmful if inhaled. Avoid breathing vapor. May cause eye or skin irritation. Wash thoroughly with soap and water after handling.

<b>FIRST AID</b>	
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted con detalle. (If you do not understand the label, find someone to explain it to you in detail.)	
<b>If on Skin or Clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in Eyes:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

### 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.

11/12

## DIRECTIONS FOR USE

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

### SHAKE WELL BEFORE USING

NATURE'S AVENGER is a broad spectrum weed killer that contains d-limonene. D-limonene is the citrus oil that is extracted from the rind of oranges. NATURE'S AVENGER is non-selective and controls most annual weeds, both grasses and broadleaves. It is recommended for non-food areas such as borders, driveways, patios, sidewalks, around mature trees and ornamentals, around building, in greenhouses, fencerows and around flower beds.

NATURE'S AVENGER 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 is required for control of perennial weeds. Spray until thoroughly wet. For best performance, **complete** coverage of target weeds is necessary.

**For Control of SMALL ANNUAL WEEDS:** apply NATURE'S AVENGER to the foliage of the small weeds (less than 6 inches) making sure leaves are thoroughly wet and uniformly covered. Do not apply if a strong threat of rain is expected within 2 hours.

**For Control of LARGER ANNUAL WEEDS and BURNDOWN of PERENNIAL WEEDS:** Larger annual weeds (more than 6 inches) and perennials are more difficult and may require re-treatment. Treat as described above.

Best results are obtained when applied to young, actively growing weeds. Weeds that are mature, dormant or hardened due to moisture stress are more resistant to herbicide treatment.

**NOTE: All contacted vegetation is affected. Avoid contacting desirable plants. Overspray or drift will injure or kill contacted vegetation.**

### PESTICIDE STORAGE AND DISPOSAL

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

**STORAGE:** Keep from freezing. Store only in original sealed container and keep out of reach of children.

**PESTICIDE DISPOSAL:** Securely wrap original container in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse container (plastic bottle). Rinse thoroughly before discarding in trash.

## 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 Cutting Edge Formulations or the Seller. To the extent consistent with applicable law, all such risks are assumed by the Buyer.

To the extent consistent with applicable law, Cutting Edge Formulations warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above. To the extent consistent with applicable law, Cutting Edge Formulations makes no other express or implied warranty of fitness or merchantability or any other express or implied warranty. To the extent consistent with applicable law, shall Cutting Edge Formulations or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, Cutting Edge Formulations and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of Cutting Edge Formulations.