

82052-4

01-15-2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

JAN 15 2009

Mr. Olav Messerschmidt  
Cutting Edge Formulations, Inc.  
3057 Summer Oak Place  
Buford, GA 30518

SUBJECT: Application for Pesticide Notification (PRN 98-10)  
Request Alternate Brand Name "EcoAvenger Weed Killer"  
EPA Reg. No. 82052-4  
Application Dated November 12, 2008

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 11/12/08 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,

A handwritten signature in black ink, appearing to read "Linda Arrington".

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



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

<b>1. Company/Product Number</b> 82052 -4	<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./ GreenMatch Burndown Herbicide	<b>PM#</b> 25	
<b>5. Name and Address of Applicant (Include ZIP Code)</b> Cutting Edge Formulations, Inc. 3057 Summer Oak Place Buford, GA 30518  <input checked="" 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: <b>EPA Reg. No.</b> <span style="font-size: 1.2em; font-weight: bold;">NOTIFICATION</span>  <b>Product Name</b> <span style="font-size: 1.2em; font-weight: bold;">JAN 15 2009</span>	

**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 checked="" type="checkbox"/> Other - Explain below.

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

Alternate Brand Name: EcoAvenger Weed Killer

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>				<b>2. Type of Container</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			<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>		<b>4. Size(s) Retail Container</b>		<b>5. Location of Label Directions</b>	
<input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		2.5, 5, 20 and 55 gallon		<input type="checkbox"/> _____	
<b>6. Manner in Which Label is Affixed to Product</b>			<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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> 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 or both under applicable law.		<b>6. Date Application Received</b> (Stamped) C
<b>2. Signature</b> 	<b>3. Title</b> Consultant / agent	
<b>4. Typed Name</b> Olav Messerschmidt	<b>5. Date</b> 11/12/2008	



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

November 12, 2008

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 – Alternate Brand Name**  
Primary name: GreenMatch Burndown Herbicide  
Alternate name: EcoAvenger Weed Killer  
EPA Registration No. 82052 - 4

Dear Mr. Tompkins:

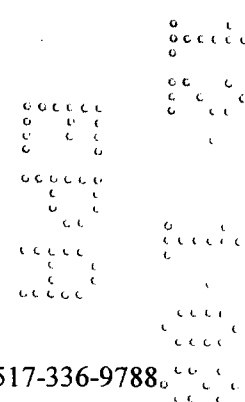
Attached is EPA form 8570-1 for a Notification to add an alternate brand name for the subject registration.

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,

Olav Messerschmidt  
OMC Ag Consulting



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EcoAvenger Label  
Version 1-1  
Nov, 2008

# EcoAvenger Weed Killer

## *For Control of Grasses and Broadleaf Weeds (both Annual and Perennial) In Crop and Non-Crop Areas*

**NOTIFICATION**

JAN 15 2009

ACTIVE INGREDIENT: d-limonene..... 55%  
INERT INGREDIENTS:..... 45%  
Total 100%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**



**FOR ORGANIC PRODUCTION**

Net Contents: 5 [or 2½ or 55] Gallons

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

- *OMRI or other organic listing logo*
- *Non-selective: controls most weeds, grasses and broadleaves*
- *Contains citrus oil*
- *Made from oranges*
- *Weed eliminator*
- *Patented formula*

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

EPA Reg. No. 82052 - 4  
EPA Est. No. 82052-GA-1

**Manufactured by:**  
Cutting Edge Formulations, Inc.  
5106 Bristol Industrial Way  
Buford, GA 30518

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

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing.

<b>FIRST AID</b>	
<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.	

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

- Long sleeved shirt and pants
- Shoes plus socks
- Protective eyewear
- Chemical resistant gloves such as nitrile rubber, polyvinyl chloride (PVC) and viton.

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.

<b>User Safety Recommendations</b>
User should: <ul style="list-style-type: none"><li>• Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.</li><li>• Remove clothing immediately if product gets inside. Then wash thoroughly and put on clean clothing.</li></ul>

**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) 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 into 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
- Chemical resistant gloves such as nitrile rubber, polyvinyl chloride (PVC) and viton.

### 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.

**General information:** EcoAvenger is a broad spectrum weed killer that contains a citrus extract. It is non-selective and controls most annual and perennial weeds, both grasses and broadleaves. **For best performance, complete coverage of target weeds is necessary.** The product does not translocate. It will affect only those portions of plants that are coated with the spray solution. **Spray until thoroughly wet.**

**Environmental Conditions:** EcoAvenger is effective over a wide range of environmental conditions. Cool weather may slow the activity of EcoAvenger. For best results, spray when ambient high temperatures are expected above 50°F and lows above freezing. On cooler days, spray during the warm part of the day.

Allow heavy dew to evaporate prior to EcoAvenger applications. Do not apply if windy conditions exist or 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 EcoAvenger:** Fill the spray tank ½ full with clean water. Add EcoAvenger while agitating. Then fill remainder with water.

**Tank Mixing of EcoAvenger:** Fill the spray tank ½ full with clean water. Add any dry formulations and then liquid formulations to the tank. Add EcoAvenger while agitating. Then fill remainder with water.

**Tank Mix Combinations:** When EcoAvenger 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.

### Application Instructions and Rates

Mix this product in clean water and apply to the foliage of vegetation to be controlled. Spray until weeds are thoroughly wet. A minimum spray volume of 60 gallons per acre is recommended. Because the underside of the weed leaf may be more susceptible, side sprays are recommended.

Do not apply this product through any type of irrigation system or by aerial application.

### Broadcast Applications

Apply EcoAvenger at a ratio of 1 part EcoAvenger into 6 parts of water (see Table 1).

<b>Table 1 - Broadcast Application: Mixing Rates for 1:6 Dilution</b>	
<b>Final Spray Volume</b>	<b>Amount of EcoAvenger 1:6 ratio (14% dilution rate)*</b>
1 Gal	20 fl. oz.
60	8½ gal
100 Gal	14 gal

*\*Percent EcoAvenger Weed Killer in water.  
(Equivalent to 8% d-limonene active ingredient in water.)*

A minimum spray volume of 60 gallons per acre is recommended. Spray until thoroughly wet. Do not exceed 8½ gallons of EcoAvenger per acre per application.

### Spot Applications (Spot Treatments)

In cool situations or for tough to kill weeds, a more concentrated spray of d-limonene may be needed. In such situations, spot treatments with a 20% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 4 parts of water may be used in spot treatments up to one (1) week before harvest (see Table 2). Do not exceed 8½ gallons of EcoAvenger per acre per application.

Table 2 - Spot Applications: Mixing Rates for 1:4 Dilution	
Final Spray Volume	Amount of EcoAvenger 1:4 ratio (20% dilution rate)*
1 Gal	26 fl. oz.
60	12 gal
100 Gal	20 gal
*Percent EcoAvenger Weed Killer in water. (Equivalent to 11% d-limonene active ingredient in water.)	

**Directions for Minimizing Spray Drift:**

Spray directly on weeds (or apply with hooded spray equipment is recommended to prevent the spray from contacting crop.) Use equipment to direct spray on to the weeds. Do not use mist blowers or any other application techniques which may result in drift on to desirable vegetation.

**Do not allow spray solution to drip, splash or drift on to desirable vegetation; small amounts can cause severe damage to crops.** Use low drift, low pressure nozzles.

These procedures will also reduce the potential for off-target drift and for crop injury:

- Spray hoods must be operated on the ground or skimming across ground surface.
- Operate at ground speeds of no greater than 5 miles per hour to avoid bouncing of the spray hoods.
- Apply when wind speeds are 10 miles per hour or less.

EcoAvenger is intended for non-selective weed control in and around all crop and non-crop areas

**CROPS**

Crop	Broadcast Treatment Instructions	Spot Treatment Instructions	Precautions and other Comments
<b>Bearing Tree, Vine and Berry Crops:</b> Berries Citrus Grapes (wine, table, raisin) Nuts Pome Fruit Stone Fruit	Apply at a 14% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 6 parts of water (see Table 1) <b>up to first fruit set.</b>  Do not exceed 8½ gallons of EcoAvenger per acre per application.  A minimum spray volume of 60 gallons per acre is recommended	In cool situations or for tough to kill weeds, a more concentrated spray of d-limonene may be needed. In such situations, spot treatments with a 20% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 4 parts of water may be used <b>up to one (1) week before harvest</b> (see Table 2).  Do not exceed 8½ gallons of EcoAvenger per acre per application.	Do not apply this product through any type of irrigation system or by aerial application.  Spray until weeds are thoroughly wet.  Follow directions for Minimizing Spray drift.  Avoid contact of herbicide solution, spray drift or mist with foliage, green bark of trunk or branches, fruit or other parts of trees, canes and vines.
<b>Non-Bearing Tree, Vine and Berry Crops:</b> Berries Citrus Grapes (wine, table, raisin) Nuts Pome Fruit Stone Fruit	Apply at a 14% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 6 parts of water (see Table 1) Do not exceed 8½ gallons of EcoAvenger per acre.  A minimum spray volume of 60 gallons per acre is recommended	Not Applicable	Do not apply this product through any type of irrigation system or by aerial application.  Spray until weeds are thoroughly wet.  Follow directions for Minimizing Spray drift.



			Avoid contact of herbicide solution, spray drift or mist with foliage, green bark of trunk or branches, fruit or other parts of trees, canes and vines.
<p><b>Vegetable Crops:</b> Brassica (cole) Vegetables Fruiting Vegetables Leafy Vegetables Legume Vegetables Root and Tuber Vegetables</p>	<p>Make pre-emergence or at planting applications of EcoAvenger, or apply to burn down winter foliage; applications must be made before seedling emergence to avoid severe injury. Allow at least 2 days between application and transplanting.</p> <p>Apply at a 14% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 6 parts of water (see Table 1) Do not exceed 8½ gallons of EcoAvenger per acre per application</p> <p>A minimum spray volume of 60 gallons per acre is recommended.</p>	<p>In cool situations or for tough to kill weeds, a more concentrated spray of d-limonene may be needed. In such situations, spot treatments with a 20% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 4 parts of water may be used (see Table 2).</p> <p>Do not exceed 8½ gallons of EcoAvenger per acre per application.</p>	<p>Do not apply this product through any type of irrigation system or by aerial application.</p> <p>Spray until weeds are thoroughly wet.</p> <p>Follow directions for Minimizing Spray drift.</p> <p>Avoid contact of herbicide solution, spray drift or mist with foliage.</p>
<p><b>Herb and Spices:</b></p>	<p>Make pre-emergence or at planting applications of EcoAvenger, or apply to burn down winter foliage; applications must be made before seedling emergence to avoid severe injury. Allow at least 2 days between application and transplanting.</p> <p>Apply at a 14% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 6 parts of water (see Table 1) Do not exceed 8½ gallons of EcoAvenger per acre per application.</p> <p>A minimum spray volume of 60 gallons per acre is recommended</p>	<p>In cool situations or for tough to kill weeds, a more concentrated spray of d-limonene may be needed. In such situations, spot treatments with a 20% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 4 parts of water may be used (see Table 2).</p> <p>Do not exceed 8½ gallons of EcoAvenger per acre per application.</p>	<p>Do not apply this product through any type of irrigation system or by aerial application.</p> <p>Spray until weeds are thoroughly wet.</p> <p>Follow directions for Minimizing Spray drift.</p> <p>Avoid contact of herbicide solution, spray drift or mist with foliage.</p>
<p><b>Non-Crop Areas:</b> Including borders, driveways, sidewalks, around mature landscaping, trees, shrubs, foliage and ornamentals, around buildings, in greenhouses and nurseries, and around flower beds.</p>	<p>Apply at a 14% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 6 parts of water (see Table 1).</p> <p>Do not exceed 8½ gallons of EcoAvenger per acre per application.</p> <p>A minimum spray volume of 60 gallons per acre is recommended</p>	<p>In cool situations or for tough to kill weeds, a more concentrated spray of d-limonene may be needed. In such situations, spot treatments with a 20% dilution rate of EcoAvenger, a ratio of 1 part EcoAvenger into 4 parts of water may be used (see Table 2).</p> <p>Do not exceed 8½ gallons of EcoAvenger per acre per application.</p>	<p>Do not apply this product through any type of irrigation system or by aerial application.</p> <p>Spray until weeds are thoroughly wet.</p> <p>Follow directions for Minimizing Spray drift.</p> <p>Avoid contact of herbicide solution, spray drift or mist with foliage, green bark of trunk or branches, fruit or other parts of trees, canes and vines.</p>

### 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:** wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** **DO NOT** reuse any part of this packaging. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burning, stay out of smoke.

**NOTIFICATION**

JAN 15 2009

### 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. 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, in no case 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.