



H. R. McLANE, INC.

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Chemical Consultants in EPA Regulatory Affairs
FFRA Licensing & Registrations
March 22, 1993

Ms. Joanne I. Miller PM-23
Document Processing Desk (2,4-D Reg. Std.)
Office of Pesticide Programs (H7505C)
Environmental Protection Agency
401 "M" Street S.W.
Washington DC 20460

Registrant: HOWARD FERTILIZER COMPANY EPA Est. No. 35512
P.O. BOX 13800 - ORLANDO, FO 32859-3800
Subject: Response to; 2,4-D Product Label Revisions
Product: TURF PRIDE LAWN FOOD WITH TRIMEC HERBICIDE
EPA Reg. No. 35512-20

Dear Ms. Miller:

This response including the enclosed revised labeling supercedes our 2,4-D response dated, FEB 05 93. 2,4-D Acid Equivalent amounts per acre, per application, per site, have been corrected.

Enclosed you will find three copies of revised labeling which conforms with the OCT 30, 1992 and JAN 14, 1993 instructional documents concerning revised labeling for 2,4-dichlorophenoxy - acetic acid (2,4-D), and its inorganic salts, amines and esters.

Please stamp ACCEPTED on the third label copy and return for our further use in State registration procedures.
We Certify labeling as follows:

"I being an authorized representative of Howard Fertilizer Company, Inc. certify that all containers of the above listed products produced by October 23, 1993 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products."

"I further certify that all containers of said products sold or distributed by this company by April 15, 1994 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products."

If there are any questions concerning this important matter please call 305 661 1706. We enclose alternate fertilizer inert addendums for each product.

Sincerely
H. R. McLane, INC.
H. R. McLane

H. R. McLane, Authorized Agent for
James H. Brown, President
HOWARD FERTILIZER COMPANY
HRM/nb/cc/JHB/HFCI

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282

TURF PRIDE Lawn Food with TRIMEC HERBICIDE

A TRIPLE ACTION BROADLEAF HERBICIDE WITH LAWN FOOD

50 lbs. TREATS 5,500 SQ.FT. of Turfgrass
For Use in Control of Broadleaf Weeds in Home Lawns, Apartment and Condominium Turf, in Parks, Playgrounds and other Ornamental & Recreational Turfgrass

A BROADLEAF WEED KILLER FOR SOUTHERN LAWNS

BALANCED LAWN FOOD GIVES TURF FAST GREENING WITH EXTENDED FEEDING

CONTROLS: Dandelions, Chickweed, Knotweed and Many Other Weeds as Listed. For Use On St. Augustine Grass, Centipede, Zoysiagrass, Bahiagrass & Bermudagrass; Bluegrass, Rye Grass, and Fescue Varieties.

ACTIVE INGREDIENTS:

- *Dimethylamine Salt of 2-(2-methyl-4-chlorophenoxy) propionic acid - - - 0.2480%
- **Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid - - - 0.0723%
- ***Dimethylamine Salt of Dicamba (3,6 dichloro-o-anisic) acid - - 0.0308%

INERT INGREDIENTS:

Total 99.6489%
100.0000%

- *Equivalent to .2050% 2(2 methyl-4-chlorophenoxy propion- acid)
- **Equivalent to .0600% 2,4-Dichlorophenoxy acetic acid
- ***Equivalent to .0255% (3,6 dichloro-o-anisic) acid (Isomers Specific by AOAC 14th Edition #6.321)

BROADLEAF WEEDS CONTROLLED

A PARTIAL LIST OF WEEDS CONTROLLED WITH THIS PRODUCT

Bedstraw	Croton	Knotweed	Pigweed	Varvain
Black Medic	Curly Dock	Kochia	Plantains	Velvetleaf
Blue Lettuce	Dandelion	Lambquarter	Poison Ivy/Oak	Vetch
Buckhorn	English Daisy	Lespedeza	Povertyweed	Wild Carrot
Bull Thistle	Fleabane	Mallow, Venice	Purslane	Wild Garlic
Burdock	Florida Pusley	Morning glory	Ragweed	Wild Lettuce
Buttercup	Ground Ivy	Mustard	Sheepspurse	Wild Onion
Chickweed	Hawkweed	Oxalis	Sheep Sorrel	Yarrow
Clover	Heelall	Pennywort	Smartweed	
Cocklebur	Herbit	Peppergrass	Spurge	and many other Broadleaf Weeds

This product contains a Complete Lawn Food and TRIMEC Herbicide, which gives triple action Broadleaf Weed control.

WHERE TO USE

This product may be used on all varieties of St. Augustine Grass, Zoysiagrass, Bermudagrass, Bahiagrass, and Centipede Grass, Perennial and Annual Varieties of Rye, Rough and Fine leafed Fescues, and Bluegrass. It should not be used where desirable clovers are present. Apply at a time when the air is calm. Do not use on newly seeded lawns until after the second cutting. After application delay seeding for at least three weeks and increase the rate of seed put down by 25%.

WHEN TO USE

Apply when weeds are young and actively growing in the spring, summer, or fall. Best results will be obtained when temperatures range from 65 to 90 degrees F. and weeds are in a vigorous state of growth from rain and/or watering. Results will be erratic if applied during drought periods. Apply when the air is calm. Lawns that are heavily over-run by hard-to-kill weeds will benefit from an additional treatment in 30 to 45 days.

HOW MUCH TO USE

The maximum rate for turf is 0.24 pounds of 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year. Select an appropriate spreader and distribute 50 lbs. per 5,500 Sq. Ft. (9.1 lbs./1,000 Sq. Ft.) of turf for control of the many weeds as listed and to supply the lawn with a complete NPK fertilization at the same time. This application applies a total of 1.2 lbs. herbicide per acre.

HOW TO MAKE SURE YOUR SPREADER IS OPERATING CORRECTLY

Using a Scott Spreader for broadleaf weeds place 4.5 lbs. granules in your spreader using No. 7 setting and apply to 500 Sq. Ft. With a 20 inch spreader this will equal 3 spreader widths wide (3 passes) by 100 feet long. If you run out before you cover the pre-measure area close the spreader setting by 1/2 the number. If you have granules left over, open (increase) the setting by 1/2 the number. For further help refer to your Spreader Guide Book.

Poor weed control will result if your spreader applies less than recommended. Make sure to apply the total pounds per sq. ft. as shown in the following chart:

SPREADER SETTINGS		
SPREADER	AMOUNT TO APPLY PER 5,500 SQ. FT.	SETTING
Scott	50 lbs.	#7
Cyclone	50 lbs.	#4

When using a 25 lb. bag, spreader settings will be the same as for the 50 lb. bag but it will treat half the Sq. Ft. These settings are based on a One Time Over application with a New spreader.

GUARANTEED FERTILIZER ANALYSIS

Nitrogen (N)	variable %
Sulfur Coated Urea	variable %
Ammoniated Nitrogen	variable %
Available Phosphoric Acid (P ₂ O ₅)	variable %
Soluble Potash (K ₂ O)	variable %
Derived from Ammonium Sulfate, Sulfur Coated Urea, Ammoniated Phosphate, Muriate of Potash (as variable fertilizer inerts)	

NOTICE: Buyer and user assumes all risk and liability of use, storage and/or handling of this material not in accordance with the terms of this label. (35512-20, PM4 103-22-93) Rev. for 2,4-D Reg. Writs Prot Version)

EPA REG. NO. 35512-20

EPA EST. NO. 35512-FL-1

Net Weight 50 Pounds

KEEP OUT OF REACH OF CHILDREN WARNING

STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. **IF INHALED:** Remove victim to fresh air and apply artificial respiration if indicated. Get medical attention. **IF IN EYES:** Flush eyes with plenty of water. Get medical attention immediately. **IF ON SKIN:** Remove contaminated clothing and wash affected area with soap and water. Get medical attention if irritation persists.

See Side/Back Panel For Additional Precautionary Statements
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed, absorbed through the skin, or inhaled. Avoid inhalation of dust and contact with eyes, skin or clothing. When using this product, wear long pants, long-sleeved shirt, socks and shoes. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Do not allow people (other than applicator) or pets on treatment area during application.

ENVIRONMENTAL HAZARD

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water, 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 washwaters. Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with misloading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for misloading equipment on an impervious pad to contain spills will help prevent groundwater contamination. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

RE-ENTRY & WORKER SAFETY STATEMENT

Do not re-enter or permit workers to reenter treated areas until dusts have settled.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Store product in its original labeled container in a cool, dry, locked place out of reach of children. **DISPOSAL:** Do not reuse empty bag. Securely wrap original container in several layers of newspaper and discard in trash.

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