

802-579

6/26/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JUN 26 2003

Ms. Molly Hickman
Brand Manager
Central Garden & Pet DBA Lilly Miller Brands
P.O. Box 2289
Clackamas, Oregon 97015

Dear Ms. Hickman:

Subject: Lilly Miller Super Rich Feed & Weed
EPA Registration No. 802-579
Application Dated June 11, 2003, Request To Amend
Confidential Statement of Formula (CSF) and To
Revise Labeling To Reflect a Change in the Isomeric
Form of the Active Ingredient, Mecoprop

The proposed amendment to the Confidential Statement of Formula (CSF), submitted on EPA Form 8570-4 and dated June 11, 2003, has been reviewed and found as an acceptable amendment to the registration of "Lilly Miller Super Rich Feed & Weed" under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The amended basic CSF has been placed in this Agency's file for the subject pesticide product registration.

The proposed labeling amendment reflecting the change in the isomeric form of mecoprop (changed from its racemic form dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid to its isomeric form dimethylamine salt of (+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid) in the ingredient statement on the labeling has been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, provided that you:

1. Revise the ingredient statements to reflect the nominal amounts of the ingredients to comply with PR Notice 91-2.
2. Have not changed the labeling other than that which was high-lighted.

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3. Do not sell or distribute this product bearing the ingredient claim for the racemic form of mecoprop 18 months from the date of this letter.
4. Submit one (1) copy of the final printed label prior to shipment of this pesticide product under the enclosed revised label.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment under this labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

Sincerely Yours,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

LILLY/MILLER
SUPER RICH FEED & WEED

A premium blend of natural and slow-release fertilizers for long-lasting green
With Trimec® broadleaf weed killer

15-5-10

Feeds 5,000 Sq. Ft.

ACTIVE INGREDIENTS:

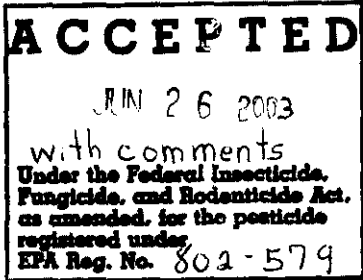
| | |
|--|---------------|
| Dimethylamine salt of 2,4-Dichlorophenoxyacetic acid | 0.28% |
| Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid | 0.13% |
| Dimethylamine salt of Dicamba (3,6-dichloro-o-anisic acid) | 0.03% |
| INERT INGREDIENTS | <u>99.56%</u> |
| Total | 100.00% |

This product contains:

- 0.02 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 0.24%.
 - 0.005 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 0.05%
 - 0.002 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.02%
- Isomer Specific by AOAC Methods.

Keep out of reach of children
CAUTION
See back panel for additional precautionary statements

NET WT. 33.3 LBS. (15.1 kg)



our Lawn Can Be a Super Rich ® Lawn in Just Four Easy Steps

Now there's a Super Rich Lawn Food for each season of the year. Start now by applying this season's recommended product. And then every three months, apply the appropriate Super Rich Lawn Food. It's as simple as that. By following the Super Rich annual program, your lawn will remain in peak condition all year long.

Winter: January – March

Super Rich Moss Control Lawn Food kills moss quickly so grass has room to grow. Greens and thickens your lawn for up to 3 months. For mild-winter climates where moss isn't a problem, apply Super Rich Fall & Winter Lawn Food.

Spring: April – June

Super Rich Feed & Weed with Trimec® controls dandelions, clover, plantain and many other broadleaf weeds while greening your lawn for up to 3 months.

Summer: July – September

Super Rich Lawn Food with 2% iron produces a dark green, deep-rooted lawn. Keeps on greening for up to 3 months. Now with non-staining iron to reduce rust spots on concrete and clothing.

Fall: October – December

Super Rich Fall & Winter Lawn Food with extra potassium keeps your lawn green through the fall and promotes thick, sturdy growth. Prepares your lawn for winter and helps it green up fast next spring.

Improved Super Rich lawn foods are now made with:

- 25% natural ingredients, including dried poultry waste and sulfate of potash magnesia (a naturally-occurring mineral)
- Four types of nitrogen for quick greening and long-term feeding
- University-endorsed ratios of nitrogen, phosphorus and potassium
- Non-staining iron* for a dark green lawn without the worry of rust spots on concrete and clothing

*In all Super Rich lawn foods except Super Rich® Moss Control Lawn Food.

Super Rich Feed & Weed kills weeds while greening and thickening your lawn. It kills dandelion, clover, black medic (Japanese clover), plantain, chickweed, buttercup, spurge, English daisy, and puncture vine. Super Rich Feed & Weed contains Trimec®--a combination of three systemic weed killers—to kill weeds from top to bottom.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Keep out of reach of children. Avoid contact with skin, eyes and 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. Avoid breathing dust. Do not allow people (other than applicator) or pets on treatment area during application. Do not reenter or permit others to reenter treated areas until granules have been washed into the soil and grass has dried.

FIRST AID

Have product container or label with you when calling a poison control center or doctor, or going for treatment.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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.

If on skin or on 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 lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget 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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. The maximum number of broadcast applications per treatment site is two per year. For household use only.

USE PRECAUTIONS

2,4-D, MCPP and Dicamba are injurious to most plants other than grasses, so this material should be applied carefully on a day with low wind velocity to avoid drift onto valuable plants. Do not use on St. Augustinegrass, dichondra, carpetgrass or clover lawns. May cause possible injury to bentgrass. Do not apply within the drip line of desirable trees and shrubs. Rinse spreader with clear water after use.

For best results, apply 33.3 lbs. to 5,000 sq. ft.

Apply any time weeds are growing actively-spring, summer or fall. Weed control is best when the foliage and soil are moist and the air temperature is between 50 and 80 degrees F. When applied during hot weather (over 80 degrees F) or on dry soil, turfgrass may be temporarily damaged.

1. Do not apply to a new lawn. Wait until lawn is 3 months old.
2. Do not mow the lawn for two days before application so that there are enough weed leaves to catch the weed killer granules.
3. Apply to moist soil and foliage using an accurate spreader. Make sure lawn is moist at time of application.
4. Do not water lawn for 24 hours after application. Resume watering, if needed, after 24 hours.
5. Make second application after one month if control of hard-to-kill weeds is not complete. Or use Lilly Miller® Lawn Weed Killer to control broadleaf weeds without harming your lawn.

SETTING YOUR LAWN SPREADER

THESE SETTINGS ARE A GUIDE. They were determined by landscape professionals using new spreaders. The condition of your spreader, your walking speed, the roughness of the lawn, and even the humidity can affect how fast the lawn food comes out. Watch the flow rate. If fertilizer appears to be coming out either slower or faster than you are covering the lawn, adjust the setting. Close the spreader when filling, turning or stopping.

Setting
(33.3 lbs. for 5,000 sq. ft.)

Drop Spreader Models

| | |
|-----------------------------|------|
| Earthway Ev-N-Spread | 10 |
| Red Devil/Precision | 3 |
| Scotts AccuGreen 1000 | 8.75 |
| Scotts AccuGreen 2000 | 9 |
| Scotts AccuGreen 3000 | 9.25 |
| Scotts Precisiongreen (PF3) | 8.5 |
| Sta Green 4500 | 2.5 |
| Vigoro 4000V | 13 |

Rotary Spreader Models

These spreaders can toss lawn food a great distance. Do not allow granules to fall in flower or shrub beds or around trees. These plants can be hurt.

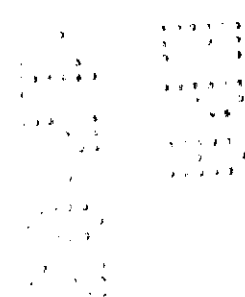
| | |
|--------------------------|------|
| Earthway Ev-N-Spread | 15 |
| Red Devil/Precision 1000 | 9.5 |
| Scotts SpeedyGreen 1000 | 9.5 |
| Scotts SpeedyGreen 2000 | 10.5 |
| Scotts SpeedyGreen 3000 | 9 |
| Sta Green 4500 | 7 |
| Vigoro SB 4000V | 10 |

Captions for illustrations:

Lawns must be thoroughly watered the day before application. Then water again lightly, just prior to application. Begin spreading by laying down two strips of lawn food at each end of lawn. Fill in remaining area as shown here. Close the spreader when you stop walking or make turns to avoid uneven coverage. Stopping and starting with the spreader box open will waste lawn food. Overlap previous wheel track slightly, as shown, to avoid gaps in coverage. Wait 24 hours for herbicide to work. Then water lawn to start the greening process.

GUARANTEED FERTILIZER ANALYSIS:

- Total Nitrogen (N) 15%
 - 2.9% Ammoniacal Nitrogen
 - 11.1% Urea Nitrogen*
 - 1.0% Water Insoluble Nitrogen
- Available Phosphate (P2O5) 5%
- Soluble Potash (K2O) 10%



Calcium (Ca) 2%
Magnesium (Mg)2%
Sulfur (S)6%
Iron (Fe)2%

Derived from ammonium sulfate, urea, polymer coated urea, dried poultry waste, ammonium phosphate, sulfate of potash magnesia, muriate of potash, iron sucate.

*4.2% slowly available urea nitrogen from polymer coated urea.

Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-lmb.com/>.

PROTECT YOUR PETS

This fertilizer contains animal manures and/or byproducts that may attract dogs or other pets. Consumption of this product may make animals sick. To minimize potential problems: 1) Store away from pets, 2) Thoroughly water in as directed.

STORAGE AND DISPOSAL

Store this product in its original container and keep out of reach of children and domestic animals. 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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Filled by weight not by volume. Product may settle after packaging.

TRIMEC is the reg. TM of PBI/Gordon Corporation.

SATISFACTION GUARANTEED: If for any reason you are not satisfied with this product, send proof of purchase to the address shown and we will gladly refund your purchase price.

LILLY MILLER BRANDS
PO BOX 2289
CLACKAMAS, OREGON 97015
EPA Reg. No. 802-579
EPA Est. 35497-OR-1
www.lillymiller.com
EPA draft 6/11/2003

