

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM 23

2217-489

10-20-98

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Craig Martens  
 PBI/Gordon Corporation  
 1217 West 12<sup>th</sup> Street  
 P.O. Box 14090  
 Kansas City, MO 64101-0090

OCT 20 1998

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p  
 Trimec Weed-'N-Feed  
 EPA Registration No. 2217-489  
 Your Submission Dated September 2, 1998

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (basic formulation dated September 2, 1998) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

DK: 305-7546: HB/PM23

CONCURRENCES

SYMBOL	SURNAME	DATE						
7505C	D. KENNY	10/20/98						

20/5

A stamped copy of the labeling is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

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

Enclosure

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3045

# TRIMEC® WEED-'N-FEED

A 20-10-5 Lawn Fertilizer Plus TRIMEC®

Controls Chickweed, Dandelion, Knotweed, Plantain, Henbit, Spurge,  
and Many Other Weeds As Listed.

**ACTIVE INGREDIENTS:**

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid .....	0.630%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.640%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.320%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid) .....	0.056%

<b>INERT INGREDIENTS:</b> .....	98.614%
<b>INERT INGREDIENTS:</b> .....	98.924%
<b>TOTAL</b>	<b>100.000%</b>

**THIS PRODUCT CONTAINS:**

- 10.6 lbs. 2, 4-dichlorophenoxyacetic acid equivalent per ton or 0.53%
- 10.6 lbs. 2-(2-Methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.53%
- 5.4 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.270%
- 0.94 lb. 3, 6-dichloro-o-anisic acid equivalent per ton or 0.047%

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

**CONTAINS SINGLE ISOMER FORM OF MECOPROP-p**

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

See back panel for Precautionary Statements.

**NET WEIGHT 22 POUNDS**

569/ APXXXXXX  
 EPA REG. NO. 2217-489  
 EPA EST. NO. 2217-KS-1  
 MANUFACTURED BY:



ACCEPTED  
 with COMMENTS  
 in EPA Letter Dated  
 OCT 20 1998

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
2217-489

4075



**READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.**

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if swallowed. When using this product, wear long-sleeved shirt, long pants, socks and shoes. Avoid inhaling dust or contact with skin, eyes or clothing.

After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

**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. Do not contaminate water when disposing of equipment washwater.

**DIRECTIONS FOR USE**

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

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has settled.

**STORAGE & DISPOSAL**

**STORAGE:** Store in original container in a locked storage area inaccessible to children and domestic animals. Do not store near food or feedstuffs.

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

**CONTAINER DISPOSAL:** Do not reuse bag. Discard bag in trash.

**USE PRECAUTIONS:**

Do not use this product where desirable clovers are present or allow the material to wind drift onto flowers, vegetables or ornamental shrubbery. Do not spread over exposed roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within dripline of tree and other ornamental species. Apply when the air is calm. Do not apply to newly seeded lawns. During application, close spreader openings when turning.

In addition to the 20-10-5 fertilizer, this product contains Trimec<sup>®</sup> herbicide. The fertilizer supplies a generous portion of the plant food needed for normal season's growth and the herbicide controls hard-to-kill weeds such as chickweed, black medic, ground ivy, knotweed, plantain, dandelions, henbit, spurge and most other common lawn weeds.

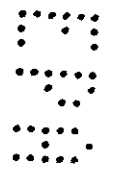
If adverse low moisture conditions prevail and weeds are in a state of poor growth, possible retreatment may be necessary with Trimec<sup>®</sup> liquid formulation when conditions improve.

**WHEN TO APPLY:**

For best results apply when weeds are growing vigorously in the spring or early fall after heavy rains.

This material may be used on bluegrass, fescue, perennial ryegrass, bermudagrass and zoysiagrass lawns. Normally, at this time there is sufficient moisture for excellent response from the fertilizer as well as very effective weed control.

Trimec<sup>®</sup> Weed-'N-Feed is a remarkably effective premium lawn food which combines the advantages of both fast and long lasting feeding action plus the broad range of weed control of the Trimec<sup>®</sup>. The fertilizer produces a thick, green turf while killing weeds to make way for turf growth. Weeds contacted by the product stop growing gradually die, and disappear from the lawn.



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- COVERS 5,000 SQUARE FEET -

**HOW MUCH TO USE:**

This 22 pound bag of Trimec® Weed-N-Feed should be used on 5,000 square feet. Apply evenly with a lawn spreader either as a one pass application or a two pass application by crisscrossing the area at half rate.

To get maximum weed killing results, do not rake, mow, or water the lawn for at least 24 hours after spreading the product.

Lawns which are heavily overrun by weeds and are in poor condition may require more than one application of this product. A suggested second application could be made in approximately 30 days.

The maximum application rate to turf is 1.0 pound 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

During application close spreader openings when turning. Spreader setting should be adjusted as follows:

Spreader Settings	
Scott.....	6
Lawn Beauty.....	5
Jackson.....	7½
Sears.....	4

The above spreader settings are approximate. Calibrate your spreader on 100 square feet and adjust to apply 1 pound per 100 square feet

20-10-5 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	20%
Water Insoluble Nitrogen (N).....	5%
Available Phosphoric Acid (P <sub>2</sub> O <sub>5</sub> ).....	10%
Soluble Potash (K <sub>2</sub> O).....	5%

**LIMITED WARRANTY AND DISCLAIMER.**

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

