

PM 23

2217-533

10/7/98

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 7 1998

Mr. Craig Martens  
PBI/Gordon Corporation  
P.O. Box 014090  
Kansas City, MO 64101

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p  
Super Trimec® Weed-'N-Feed  
EPA Registration Number: 2217-533  
Your Submission Dated September 14, 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(s) of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to the Confidential Statement(s) of Formula (CSF) or the product labeling other than those specified within the body of your certification statement or cover letter dated September 14, 1998. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop 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 09/14/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #<sup>9</sup>8:s549852.cnv

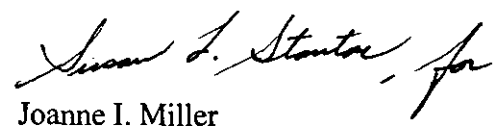
CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Oct 7, 1998							

275

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

395

# SUPER TRIMEC® WEED-'N-FEED

A 20-10-5 Lawn Fertilizer Plus Trimec®

Contains 2,4-D Plus MCPP MCPP-p and Dicamba.

-Covers 5,000 Square Feet-

Controls Chickweed, Dandelion, Knotweed, Plantain,  
Henbit, Spurge and many other weeds as listed.

### ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid .....	1.040%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.471%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.236%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	0.108%

INERT INGREDIENTS: ..... 98.381%

INERT INGREDIENTS: ..... 98.616%

TOTAL 100.00%

### THIS PRODUCT CONTAINS:

- 17.0 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton or 0.855%
- 7.8 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.39%
- 3.9 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.195%
- 1.8 lbs. 3,6-dichloro-o-anisic acid equivalent per ton or 0.09%

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 20 POUNDS

578 APXXXXXX  
 EPA Reg. No. 2217-533  
 EPA Est. No. 2217-KS-1  
 MANUFACTURED BY:

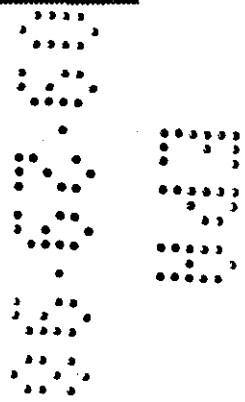


ACCEPTED  
 with COMMENTS  
 In EPA Letter Dated  
 OCT 7 1998

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
 2217-533

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EPA Reg. No. 2217-533 Amendment



4 7 5



**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 and 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 bag 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 product to "wind-drift" on flowers, vegetables or ornamental shrubbery. Do not apply to newly seeded lawns. During application close spreader openings when turning. Apply when the air is calm. Do not apply to areas underlaid by roots of desirable trees and shrubs.

GUARANTEED ANALYSIS 20-10-5	
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%

In addition to the 20-10-5 fertilizer, this product contains Trimec® Turf 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, 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 a Trimec® 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.

The material may be used on bluegrass, fescue, 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.

Super Trimec® Weed-'N-Feed is a remarkably effective lawn food which combines the advantages of both fast and long lasting feeding action plus the broad range of weed control of the Trimec. 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.

**HOW MUCH TO USE:**

This 20 pound bag of Super 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, crisscrossing the area at half the rate each time.

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.

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 ½ pound of product per 100 square feet.

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

**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.

