



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

JUL 30 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Craig Martens
PBI Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Weed-'N-Feed 5 23-3-7
EPA Registration Number: 2217-560
Your Submission Dated April 5, 2002

The Agency is conditionally approving an amendment to the registration for 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 Statements of Formula (CSFs) 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 product other than those specified within the body of your certification statement and cover letter dated April 17, 2002. 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.
3. Update the labeling to delete "spray has dried or" under the heading "It is a violation....with its labeling".

A copy of the revised Basic CSF dated April 3, 2002 has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'J. Miller', written over the typed name.

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

Enclosure

3 7 6

WEED-'N-FEED 5

23-3-7

(Sixteen, Eighteen, or Twenty) Pounds Covers 5,000 Square Feet.

Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge and many other broadleaf weeds including those listed on the back panel.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	0.83%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.20%
Dimethylamine salt of dicamba: (3,6-dichloro-o-anisic acid).....	0.09%
INERT INGREDIENTS.....	98.88%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 13.8 lbs. or 0.69% 2,4-dichlorophenoxyacetic acid equivalent per ton.
 - 3.4 lbs. or 0.17% (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton.
 - 1.6 lbs. or 0.08% 3,6-dichloro-o-anisic acid equivalent per ton.
- Isomer Specific by AOAC Methods.
 Contains the single isomer form of Mecoprop-p.
 TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Statement of Practical Treatment

~~In case of contact, wash skin with plenty of soap and water.~~
~~For eyes, flush with water for 15 minutes and get medical attention.~~
 See back panel for additional Precautionary Statements.

NET WEIGHT (16, 18, or 20) POUNDS

588 APxxxxxx
 EPA REG. NO. 2217-560 Amend
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



ACCEPTED
with COMMENTS
In EPA Letter Dated:
 JUL 30 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2217-560

4 8 6



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Do not inhale dust. Do not allow contact with skin, eyes or clothing. When using this product, wear long-sleeved shirt, long pants, 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.

First Aid

If in eyes:	<ul style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • 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 swallowed:	<ul style="list-style-type: none"> • 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.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p> <p>You may also call toll-free, 1-877-800-5556 for emergency medical treatment information.</p>	

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. Do not apply when weather conditions favor drift from target area.

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: Store in original container and keep any bags containing unused product 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.

DISPOSAL:

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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

USE PRECAUTIONS:

Do not use on dichondra, carpetgrass, closely-mowed bentgrass putting greens or St. Augustinegrass. Do not use this product where desirable clovers are present or allow the material to drift onto flowers, vegetables or ornamental shrubbery. Do not spread over exposed roots of trees and other ornamental species. Apply when the air is calm. Do not apply to newly seeded lawns. During application, close spreader openings when turning.

INSTRUCTIONS:

Weed-N-Feed 5 controls a wide range of lawn weeds, including dandelion, chickweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 23-3-7 fertilizer provides a supply of plant food needed for a normal season's growth. Possible retreatment may be necessary if (a) lawn is heavily overrun by weeds, or, (b) if adverse low moisture conditions prevail and weeds are in a state of poor growth. A second application may be made in approximately 30 days.

The maximum application rate to turf is 1.2 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.

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering (see step 4).
3. Apply when weeds are young and actively growing, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to hold the material and prevent dust drift onto nontarget plants.
4. Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

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

The above spreader settings are approximate.

- 16 pound bag:** Calibrate your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- 18 pound bag:** Calibrate your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet
- 20 pound bag:** Calibrate your spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet

23-3-7 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	23%
Water Insoluble Nitrogen	5%
Available Phosphoric Acid (P ₂ O ₅).....	3%
Soluble Potash (K ₂ O).....	7%

Labeling Requirements:

- All fertilizer products distributed in Washington at a minimum, must have the following labeling statement: *"This product has been registered with the Washington State Department of Agriculture. When applied as directed, this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product."*
- After July 1, 1999, the label must also state: *"Information received by the Washington State Department of Agriculture regarding the components in this product is available on the internet at <http://www.wa.gov/agr/>."*

- WEEDS -		
Bedstraw	Knotweed	Ragweed
Black medic	Lambsquarters	Sheep sorrel
Buckhorn	Lespedeza	Shepherdspurse
Burdock	Mallow	Speedwell
Chickweed	Morningglory	Spurge
Chicory	Oxalis	Thistle
Clover	Peppergrass	Wild carrot
Dandelion	Pigweed	Wild garlic
Dock	Plantain	Wild lettuce
Ground ivy	Poison ivy	Wild onion
Healall	Poison oak	Yarrow
Henbit	Purslane	

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.