

PM 23

2217-561

10/29/98

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

OCT 29 1998

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Weed 'N Feed 6
EPA Registration Number: 2217-561
Your Submission Dated September 03, 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 your certification 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. 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 09/03/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

McCoke
10-29-98

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.

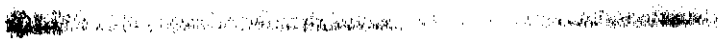
Sincerely yours,

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

Enclosure

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WEED-'N-FEED 6

A 23-3-7 Lawn Fertilizer Plus Trimec®

Contains 2,4-D, 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	0.462%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.230%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)	0.108%
INERT INGREDIENTS	98.390%
INERT INGREDIENTS	98.622%
TOTAL	100.000%

THIS PRODUCT CONTAINS:

- 17.00 ~~17.20~~ lbs. 2, 4-dichlorophenoxyacetic acid equivalent per ton or 0.855% ~~0.86%~~
- 7.64 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.382%
- 3.80 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.19%
- 1.80 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

589 APXXXXXX
 EPA REG. NO. 2217-561
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



ACCEPTED
 with COMMENTS
 In EPA Letter Dated

OCT 29 1998

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-561



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid inhaling dust or contact with skin, eyes and 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.

ENVIRONMENTAL HAZARDS:

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. 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.

PRODUCT 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 on dichondra, carpetgrass, St. Augustinegrass or bentgrass. Do not use this product where desirable clovers are present or allow the product to 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 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.

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%

In addition to the 23-3-7 fertilizer, this product contains Trimec® turf herbicide. The fertilizer supplies a portion of the plant food needed for normal season's growth and the herbicide controls hard-to-kill weeds such as thickweed, 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.

This product may be used on bluegrass, fescue, perennial ryegrass, bermudagrass and zoysiagrass. Weed-'N-Feed 6 is an effective lawn food which combines the advantages of fertilization plus the broad range of weed control of the Trimec®. Weeds contacted by the product stop growing, gradually die, and disappear from the lawn.

HOW MUCH TO USE:

This twenty pound bag of Weed-'N-Feed 6 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 one-half the 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 1.5 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.

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

The above spreader settings are approximate. Calibrate your spreader on 250 square feet and adjust to apply 1.0 pound of product per 250 square feet.

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.