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

NOV 6 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
St. Augustinegrass Weed & Feed 580 20-106
Lawn Fertilizer
EPA Registration Number: 2217-568
Your Submission Dated July 23, 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 07/23/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

P. Lake
-C-98

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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
Herbicide Branch
Registration Division (7505C)

Enclosure

3 of 5

ST. AUGUSTINEGRASS WEED & FEED 580

20-10-5

LAWN FERTILIZER PLUS TRIMEC®

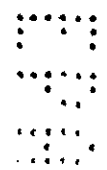
- Covers 5,000 Square Feet -

Controls Chickweed, Dandelion, Knotweed, Plantain, Henbit, Spurge,
and many other weeds in St. Augustinegrass, Centipedegrass,
Bentgrass and most other grasses.

ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid.....	0.1746%
2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.7897%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.3943%
Dicamba (3,6-dichloro-o-anisic acid).....	0.0635%

INERT INGREDIENTS.....	98.9722%
INERT INGREDIENTS.....	99.3670%
TOTAL	100.0000%



CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

EQUIVALENT TO:

- 3.488 lbs of 2,4-dichlorophenoxyacetic acid per ton.
- 15.775 lbs of 2-(2-methyl-4-chlorophenoxy)propionic acid per ton.
- 7.898 lbs (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid per ton.
- 1.268 lbs of (3,6-dichloro-o-anisic acid) per ton.

Isomer Specific by AOAC Methods.

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for Precautionary Statements
and Statement of Practical Treatment

NET WEIGHT 20 POUNDS

APXXXXXX

EPA REG. NO. 2217-568

EPA EST. NO. 2217-KS-1

MANUFACTURED BY:



KANSAS CITY, MO 64101

ACCEPTED
with COMMENTS
In EPA Letter Dated

NOV 6 1998

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

2217-568

4/25



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

PRECAUTIONARY STATEMENTS

Hazards to Humans and 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:

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. 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.

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 or pets.

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 DIRECTIONS:

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 spread over exposed roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within dripline of trees and other ornamental species.

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

GENERAL INFORMATION:

This product contains a special formulation low in 2,4-D for maximum safety to St. Augustinegrass. The fertilizer provides needed plant food while the herbicide will control hard-to-kill weeds such as creeping Charlie, knotweed, chickweed, dandelions and plantains and most other broadleaf weeds.

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

This product can be used on such sensitive grasses as St. Augustinegrass, bahiagrass, centipedegrass, bermudagrass, bentgrass and zoysiagrass. Under conditions of adequate moisture, high temperature and high humidity, over application may cause minor transitory discoloration on St. Augustinegrass.

WHEN TO APPLY:

For best weed control, application should be made when weeds are growing vigorously. Application can be made at any time but for maximum safety to St. Augustinegrass, make application during spring and fall when temperatures are moderate.

Safs

HOW MUCH TO USE:

This twenty pound bag 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 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.

The maximum application rate to turf is 0.4 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 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 at the rate of one-half pound of product per 100 square feet.

The following is a partial list of weeds controlled by this product:

Bedstraw	Knotweed	Ragweed
Black medic	Lambsquarters	Sheep sorrel
Buckhorn	Lespedeza	Shepherdspurse
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	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.