

2217-579

5/23/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

MAY 23 2002

Dear Mr. Martens:

SUBJECT: Gordon's Trimec® Weed & Feed 30
EPA Registration No. 2217-579
Application and Letter Dated May 1, 2002, Request
To Amend Registration: Conversion To MCPP, with
Fast Track Review with Revised Basic Formulation on
on EPA Form 8570-4, Confidential Statement of Formula
(CSF), Basic Formulation; Dated April 3, 2002

The proposed amendment to the registration of the subject pesticide product is conditionally accepted under section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment this Agency is approving the conversion of the active ingredient mecoprop from its racemic forms [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 in support of the conversion is 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 (CSFs) 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 this product containing the racemic form of mecoprop and bearing that previously approved labeling for 18 months from the date of this letter, provided that the labeling complies with requirements as described in PR Notices that you should have received from this Agency. Note, some of the requirements may have to be addressed by amendments prior to the 18 months.
3. The section "Spreaders and Calibration", instruction 1., must be revised to read: "Drop spreaders and rotary spreaders must be calibrated for accurate application of this product".
4. This Agency does not certify or accept spreader setting as presented under "Suggested Spreader Settings" by accepting the proposed labeling requested.

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- 5. Revise the "Limited Warranty and Disclaimer" statements by adding a statement that allows the purchaser of this product to return this product to the seller, if after reading the labeling there is a reason that the remedies stated are unacceptable. You may limit the time of return after purchase to that which is reasonable. A copy of the Uniform Commercial Codes that are applicable to the remedies claimed are enclosed with an example of an acceptable warranty with limitation of remedies.

The Confidential Statement of Formula has been placed in this Agency's file for this pesticide product registration. A stamped copy of the labeling is enclosed for your records. This labeling supersedes all previous accepted labeling. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

Eugene M. Wilson
 for Joanne I. Miller
 Product Manager (23)
 Herbicide Branch
 Registration Division (7505C)

Enclosures

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GORDON'S TRIMEC® WEED & FEED 30 24-4-8

ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid.....	0.69%
(+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid	0.15%
Dicamba: 3,6-dichloro-o-anisic acid.....	0.06%
INERT INGREDIENTS:.....	99.10%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 13.8 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton
- 3.0 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per ton
- 1.2 lbs. 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.~~

See back panel for Precautionary Statements.

NET WEIGHT (15, 16, 18 or 20) POUNDS

575 AP-----

EPA REG. NO. 2217-579 Amend

EPA EST. NO. 2217-KS-X

MANUFACTURED BY:



An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101

Telephone: 1-800-821-7925

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAY 23 2002
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-579



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

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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:

Drift or runoff may adversely affect 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 AND DISPOSAL

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.

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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 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. Application of this product to newly seeded areas should be delayed until the third mowing. ~~During application, close spreader openings when turning.~~ Do not contaminate domestic or irrigation waters.

INSTRUCTIONS:

Gordon's Trimec® Weed & Feed 30 contains Trimec® herbicide. Trimec® controls a wide range of lawn weeds, including dandelion, chickweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a (X-X-X analysis of fertilizer grade) fertilizer provides a supply of plant food. 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. Treated areas may be seeded 3 to 4 weeks after application.

Note to Supplemental Registrants: Guarantees for plant nutrients other than nitrogen, phosphorous, and potassium may be permitted or required by regulation by the _____. The guarantees for such other nutrients shall be expressed in the form of the element. The source (oxides, salts, chelates, etc.) of such other nutrients may be required to be stated and may be included on the label.

For state registrations in Kentucky, add the following paragraph:

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing (*Number of pounds) of nitrogen per 1,000 square feet. Please consult your local extension office for questions regarding a regular fertilizer program suitable for your geographic region.

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/>."*

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 the 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.

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

The above spreader settings are approximate. (15 pound bag: Calibrate your spreader on 330 square feet and adjust to apply 1.0 pound of product per 330 square feet of turfgrass. (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.)

SPREADERS AND CALIBRATION:

1. Drop spreaders and rotary spreaders should be calibrated for uniform application of this product.
2. Close spreader opening (orifice).
3. Adjust spreader setting using the Spreader Suggestions chart

Application Rate = 3 lbs. of product per 1,000 square feet.

SUGGESTED SPREADER SETTINGS:

Centrifugal/Rotary Spreaders	Application Rate, 3 lbs./1,000 sq.ft.
Frank's Broadcast	2 1/4
Scotts Speedy Green	5
Radio Flyer #0047	8 ¼
True Temper Rotary CB2000	3 ¾
Earthway Rotary #2050SU	14 ½
Drop Spreaders	Application Rate, 3 lbs./1,000 sq.ft.
Frank's Drop	8 ¼
Greenview II	5 ½
True Temper CD20	4 - 4 ½
Scotts Accugreen AG1	5 ½
Earthway Drop #7300SU	13 ½

These spreader settings are approximate. Differences may occur due to the condition of spreader, speed at which applied and roughness of area treated. Check your spreader on 330 square feet and adjust to apply at the rate of 1 pound per 1,000 square feet.

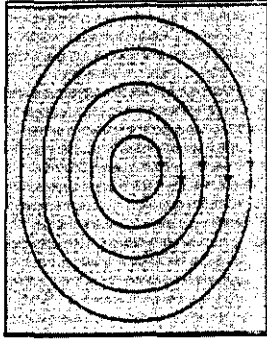
4. CALIBRATION INSTRUCTIONS:

- For 3.0 pounds of product per 1,000 square feet of turfgrass: Check you spreader on 330 square feet and adjust to apply at the rate of 1 pound of product per 330 square feet.
- For 3.2 pounds of product per 1,000 square feet of turfgrass: Check you spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- For 3.6 pounds of product per 1,000 square feet of turfgrass: Check you spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.
- For 4.0 pounds of product per 1,000 square feet of turfgrass: Check you spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet.

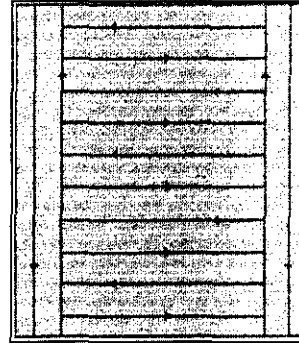
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5. Fill spreader. Fill spreader on driveway or sidewalk to eliminate the chance of spillage on the lawn.
6. Apply the product to lawn. Refer to the patch charts below:

Path A for centrifugal/rotary spreaders.



Path B for drop spreaders.



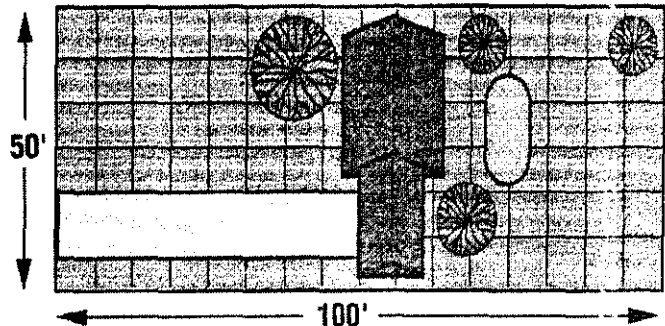
7. Close the spreader openings when turning to change directions or when stopping.
8. If using a centrifugal/rotary spreader, avoid spreading product into adjacent landscape, flowers or vegetable plantings.

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NOTE: Supplemental applications of lawn fertilizer are needed to achieve a minimum 1 pound nitrogen per 1,000 square feet.

This ___ pound bag should cover approximately ___ square feet (___ ft. x ___ ft.) Refer to the table and picture to determine the size of your lawn.

COVERAGE CHART	
_____	Length
X _____	Width
= _____	Total Sq. Ft.
- _____	Non-Lawn Areas
= _____	Total Sq. Ft. Coverage you need.



24-4-8 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	24%
Water Insoluble Nitrogen	5%
Available Phosphate (P ₂ O ₅).....	4%
Soluble Potash (K ₂ O).....	8%

Note to Supplemental Registrants: Fertilizer sources may vary in micronutrient composition, and iron may discolor or stain concrete. For fertilizers containing iron: Sweep all fertilizer from concrete surfaces immediately after application. Do not wash this product from concrete surfaces because fertilizers which contain iron may cause discoloration upon oxidation.

- 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	

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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.

APPENDIX

I. Previously Approved Fertilizer Grades:

- Fertilizer grades with nutrient contents expressed as the percentages of N, P₂O₅, and K₂O include the following:

10-6-4	16-3-5	20-10-0-(1)	23-7-7	25-4-8	28-3-8	32-4-8
10-16-20	16-6-9	20-10-5	24-3-7	26-3-3	29-3-4	
10-18-10	18-3-5	21-5-7	24-4-8	26-3-5	30-3-4	
12-5-5	18-6-12	22-6-6	25-3-3	26-4-6	30-3-5	
15-5-10	20-4-6	22-7-7	25-3-5	28-3-3	30-3-10	
16-2-3	20-4-8	22-10-10	25-3-8	28-3-7	30-4-8	

The fertilizer grade guaranteed analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations. The following guaranteed analyses presentations have previously been submitted as notifications:

10-16-20 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	10%
6.0% Ammoniacal Nitrogen	
4.0% Urea Nitrogen	
Available Phosphate (P ₂ O ₅).....	16%
Soluble Potash (K ₂ O).....	20%
Magnesium (Mg).....	1.0%
0.1% Water Soluble Magnesium (Mg)	
Sulfur (S).....	2.0%
2.0% Combined Sulfur (S)	
Iron (Fe).....	1.0%
Manganese (Mn).....	0.5%
0.1% Water Soluble Manganese (Mn)	
Nutrient Sources: Urea, Ammonium Phosphate, Ammonium Sulfate, Muriate of Potash, Ferrous Sulfate, Manganese Oxide, Manganese Sulfate, Sulfate of Potash Magnesia and Magnesium oxide.	

29-3-4 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	29%
1.1% Ammoniacal Nitrogen	
27.9% Urea Nitrogen	
Available Phosphate (P ₂ O ₅).....	3%
Soluble Potash (K ₂ O).....	4%
Derived from: Polymer-coated urea, urea, diammonium phosphate, and muriate of potash.	
* 11.0% slowly available urea nitrogen from polymer coated urea.	
Chlorine (Cl), note more than.....	4.0%

10-18-10 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	10%
10.0% Ammoniacal Nitrogen	
Available Phosphate (P ₂ O ₅).....	18%
Soluble Potash (K ₂ O).....	10%
Sulfur (S).....	2.0%
5.0% Combined Sulfur (S)	
Nutrient Sources: Ammonium Sulfate, Ammonium Phosphate and Muriate of Potash.	

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26-4-6 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	26%
1.8% Ammoniacal Nitrogen	
24.4% Urea Nitrogen	
Available Phosphoric Acid(P ₂ O ₅).....	4%
Soluble Potash (K ₂ O).....	6%
Boron (B).....	0.02%
Copper (Cu).....	0.05%
Iron (Fe).....	1.00%
Total Manganese (Mn).....	0.06%
Molybdenum (Mo).....	0.0005%
Zinc (Zn).....	0.05%
Primary Plant Food Sources: Sulfur coated urea, urea, diammonium phosphate, muriate of potash.	
Secondary Plant Food Sources: Fertilizer grade borate, sulfates and oxides of copper, sulfates and oxides of iron, oxides of manganese, fertilizer grade molybdate, and sulfates and oxides of zinc.	
*4.0% slowly available urea nitrogen from sulfur coated urea.	
Chlorine (Cl), not more than	4.8%

28-3-7 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	28%
1.2% Ammoniacal Nitrogen	
26.8% Urea Nitrogen	
Available Phosphoric Acid(P ₂ O ₅).....	3%
Soluble Potash (K ₂ O).....	7%
Primary Plant Food Sources: Polymer-coated urea, urea, diammonium phosphate, muriate of potash	
*7.0% slowly available urea nitrogen from polymer-coated urea.	
Chlorine (Cl), not more than	6.4%

II. Advertising claims that may be presented on the retail containers:

- ◆ (Fifteen, Sixteen, Eighteen or Twenty) Pounds Covers Up To 5,000 Square Feet.
- ◆ Controls/Kills dandelion, chickweed, knotweed, plantain, henbit, spurge and many other broadleaf weeds; some of which are listed on the back panel
- ◆ An 18-6-12 fertilizer provides slow-release feeding to promote winter hardiness and drought tolerance in lawns.
- ◆ Feeds your lawn for up to 12 weeks.
- ◆ Controls/Kills over 30 varieties of weeds while feeding your lawn
- ◆ Greens lawns and develops deep roots while controlling weeds.
- ◆ Bring out the best with the turf magic touch!
- ◆ Controls/Kills dandelion, plantain, and other weeds.
- ◆ Feeds the lawn with two (2) types of nitrogen and is pelleted for easy application.
- ◆ Controls (Number) weeds! (Listing of weeds may include the following.)

◆ Controls (Number) weeds! (Listing of weeds may include the following.)

- WEEDS -			
Annual yellow sweetclover	Cockle	Musk thistle	Spiny amaranth
Aster	Cocklebur	Mustard	Spiny cocklebur
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spiny sowthistle
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted catsear
Beggarticks	Cudweed	Nettle	Spotted spurge
Betony, Florida	Curly dock	Orange hawkweed	Spurweed
Bindweed, field	Daisy, English	Oriental cocklebur	Stinging nettle
Bird vetch	Daisy fleabane	Oxalis	Strawberry, India mock
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall nettle
Bittercress, hairy	Dandelion	Parsnip	Tall vervain
Bitterweed	Dichondra	Pearlwort	Tansy ragwort
Black-eyed Susan	Dogbane	Pennycress	Tansy mustard
Black medic	Dogfennel	Pennywort	Tanweed
Black mustard	Dollarweed	Peppergrass	Thistle
Blackseed plantain	Elderberry	Pepperweed	Trailing crownvetch
Blessed thistle	False dandelion	Pigweed	Tumble mustard
Bloodflower milkweed	False flax	Pineywoods bedstraw	Tumble pigweed
Blue lettuce	False sunflower	Plains coreopsis (tickseed)	Velvetleaf
Blue vervain	Fiddleneck	Plantain	Venice mallow
Bracted plantain	Florida pusley	Poison ivy	Virginia buttonweed
Brassbuttons	Frenchweed	Poison oak	Virginia creeper
Bristly oxtongue	Galinsoga	Pokeweed	Virginia pepperweed
Broadleaf dock	Goathead	Poorjoe	Water pennywort
Broadleaf plantain	Goldenrod	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Ground ivy	Prickly lettuce	Western clematis
Buckhorn	Gumweed	Prickly sida	Western salsify
Buckhorn plantain	Hairy fleabane	Prostrate knotweed	White mustard
Bulbous buttercup	Hawkweed	Prostrate pigweed	Wild aster
Bull thistle	Healall	Prostrate spurge	Wild buckwheat
Bullnettle	Heartleaf drymary	Prostrate vervain	Wild carrot
Burclover	Heathaster	Puncturevine	Wild four-o'clock
Burdock	Hedge bindweed	Purslane, common	Wild garlic
Burning nettle	Hedge mustard	Ragweed	Wild geranium
Burweed	Hemp	Red sorrel	Wild lettuce
Buttercup	Henbit	Redroot pigweed	Wild marigold
Buttonweed	Hoary cress	Redstem filaree	Wild mustard
Canada thistle	Hoary plantain	Rough cinquefoil	Wild onion
Carolina geranium	Hoary vervain	Rough fleabane	Wild parsnip
Carpetweed	Horsenettle	Russian pigweed	Wild radish
Catchweed bedstraw	Jimsonweed	Russian thistle	Wild rape
Catnip	Knawel	Scarlet pimpernel	Wild strawberry
Catsear	Knotweed	Scotch thistle	Wild sweet potato
Chickweed, common	Kochia	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lambsquarters	Shepherdspurse	Woodsorrel
Chicory	Lespedeza	Slender plantain	Woolly croton
Cinquefoil	Mallow	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Matchweed	Smooth dock	Woolly plantain
Clover, hop	Mexicanweed	Smooth pigweed	Wormseed
Clover, red	Milk vetch	Sorrel	Yarrow
Clover, strawberry	Morningglory	Sowthistle	Yellow rocket
Clover, sweet	Mouseear hawkweed	Spanishneedles	Yellowflower pepperweed
Clover, white	Mugwort	Speedwell	and other broadleaf weeds