UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM 23

2217-594

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8-21-98

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AUG 2 1 1998

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

Dear Mr. Martens:

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Subject: Conversion from MCPP to MCPP-p Gordon't St. Augustinegrass Lawn Weeder & Feeder EPA Registration Number: 2217-594 Your Submission Dated July 23, 1998

The Agency is conditionally approving an amendment to the registration of the abovereferenced 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 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.

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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 (23) Herbicide Branch Registration Division (7505C)

Enclosure

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GORDON'S ST. AUGUSTINEGRASS LAWN WEEDER & FEEDER 16-4-8

Sec. 84.

TREATS UP TO 5,000 SQUARE FEET

For Use On St. Augustinegrass And Other Grasses For Control Of Broadleaf Weeds

ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid	0.0820%
2-(2-methyl-4-chlorophenoxy)propionic acid	0.2952%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.1476%
Dicamba: 3,6-dichloro-o-anisic acid	0.0295%
INERT INGREDIENTS:	99.5933%
INERT INGREDIENTS	99.7409%
TOTAL	100.0000%

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

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THIS PRODUCT CONTAINS:

1.64 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.

5.90 lbs. 2 (2 methyl-4 chlorophenoxy) propionic acid equivalent per ton.

2.95 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propronic acid equivalent per tan.

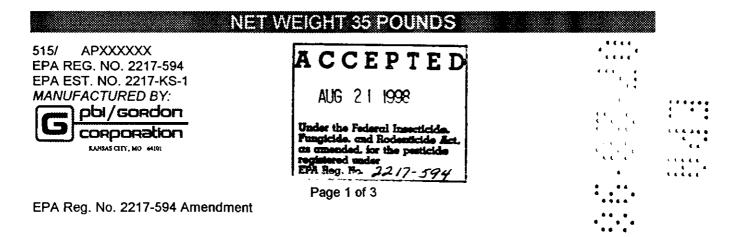
0.59 lbs. 3,6-dichloro-o-anisic acid equivalent per ton.

Isomer Specific by AOAC Methods

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for Precautionary Statements and Statement of Practical Treatment.





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 inhalation or contact with eyes, skin or clothing. When using this product, wear long-sleeved shirt, long pants, socks and shoes.

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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 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.

PRODUCT DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse bag. Discard bag in trash.

USE PRECAUTIONS:

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Do not use this product where desirable clovers are present or allow the material to wind drift onto flowers, vegetables or ornamental shrubbery. 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. During application, close spreader openings when turning. Do not use on newly seeded tawns.

16-4-8 GUARANTEED ANALYSIS	
Total Nitrogen (N)	16.00%
Ammonical Nitrogen (N)	2.67%
Water Soluble Organic Nitrogen (N)	8.67%
Water Insoluble Nitrogen (N)	4.67%
Available Phosphate (P2O5)	4.00%
Soluble Potash (K ₂ O)	8.00%

Gordon's St. Augustinegrass Lawn Weeder & Feeder destroys growing broadleaf weeds as it feeds St. Augustinegrass, bermudagrass, centipedegrass, zoysiagrass and other turfgrasses.

Page 2 of 3

CONTROLS THESE WEEDS:

Black medic	Henbit	Plantains
Chickweed	Knotweed	Poison ivy
Clover	Lambsquarters	Purstane
Cocklebur	Mustard	Ragweed
Dandelion	Oxalis	Spurge
Dock	Peppergrass	Wild lettuce and most
Florida pusley	Pigweed	other broadleaf weeds.

TIME TO APPLY:

Apply at any time broadleaf weeds are present except avoid treating St. Augustinegrass in summer months (June through September) when it is growing rapidly, because temporary foliage discoloration may occur. Best results are obtained when weeds are young and growing vigorously. If weeds are growing slowly, control will be slow and more than one application may be needed. Moisture from dew or watering on weed foliage at time of application aids control. Do not water for 24 to 48 hours after application.

HOW MUCH TO APPLY:

Use 35 pounds of product per 5,000 square feet for St. Augustinegrass and bentgrass. Over-application may cause temporary discoloration. On other grasses such as bluegrass, bermudagrass, zoysiagrass, fescuegrass, and bahiagrass use 35 pounds of product per 3,500 square feet of lawn.

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.

SUGGESTED SPREADER SETTINGS:

May vary with age, model and condition of spreader and waking speed. Calibrate your spreader on a known area.

SPREADER SETTINGS					
Make of Spreader	Bentgrass & St. Augustinegrass	Other Grasses			
K-Mart	3 ¼	4 3/4			
Lawn Beauty	7 1/2	8 1⁄4			
Scotts	4 1⁄4	5			
Sears	5 3⁄4	6 1/2			
Wards	6	6 1/2			

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 beyoftil 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 state nents 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.