



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
Gordon's Trimec Weeder Granules
EPA Registration Number: 2217-640
Your Submission Dated May 1, 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 May 1, 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,



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

Enclosure

GORDON'S TRIMEC® WEEDER GRANULES

ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid.....	1.37%
(+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid.....	0.31%
Dicamba: 3,6-dichloro-o-anisic acid.....	0.13%
INERT INGREDIENTS:.....	98.19%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 27.4 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.
 - 6.2 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per ton.
 - 2.6 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.

NET WEIGHT 10 OR 20 POUNDS

650/ APxxxxxx
 EPA REG. NO. 2217-640 Amend
 EPA Est. No. 2217-KS-1
 MANUFACTURED BY:



Telephone: 1-800-821-7925

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.**
2217-640



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 hand 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 eye. • 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. For additional information in case of emergency, call toll free 1-877-800-5556.</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 contaminate domestic or irrigation waters. 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.

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partially filled: Call your local solid waste agency or toll-free number (1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

USE PRECAUTIONS:

Do not allow the material to drift onto flowers, vegetables or ornamental shrubbery. Apply when the air is calm. Do not apply to newly seeded lawns. Do not apply in areas underlaid by roots of desirable trees and shrubs. 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 contaminate domestic or irrigation waters.

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INSTRUCTIONS:

Gordon's Trimec® Weeder Granules controls a wide range of lawn weeds including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. 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.

Established turf of warm season grasses includes bermudagrass, centipedegrass, and zoysiagrass. Established turf of cool season grasses includes Kentucky bluegrass, perennial ryegrass, tall fescue, and turf-type tall fescues. Do not apply this product on carpetgrass, dichondra, St. Augustinegrass, or established turf containing desirable clovers.

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.

Option 1: Coverage and Spreader Settings

Spreader Settings	
Scott.....	5½
Sears.....	6

The above spreader settings are approximate. Calibrate your spreader on 100 square feet and adjust to apply at the rate of 1 pound of product per 500 square feet.

Option 2: Alternate Coverage and Spreader Settings

COVERAGE: To determine how much fertilizer you need to apply, multiply the length of your lawn by its width. This equals your total square footage. Deduct any non-lawn areas (house, garden, etc.). One bag covers 5,000 sq. ft. [Length x Width = Total Sq. Ft. - Non-Lawn Areas = Total Sq. Ft. Coverage You Need]

SPREADER SETTINGS:

IMPORTANT: It is important to follow the directions as indicated on this quality lawn care product as over application may cause injury to your lawn. Spreader settings are approximate. Differences may occur due to condition of spreader, speed at which applied and roughness of area treated. Be sure to check spreader before beginning, adjusting if necessary. Consult Owner's Manual. *Never apply by hand.*

Spreading Hints: These granular settings are approximate. Calibrate your spreader on 100 sq. ft. and adjust to apply at the rate of 1 lb. of product per 500 sq. ft. (This bag covers 5000 sq. ft. of lawn area.)

To avoid gaps and streaks, first spread border of lawn and then fill in center with uniform parallel passes. Walk at a steady pace so as to apply evenly throughout the lawn. (Graphics and/or diagrams may be presented on the container label).

Rotary Spreaders	Setting	Drop Spreaders	Setting
Ames	see spreader instructions	Ames	see spreader instructions
BV-N-Spread	13	Bandini	2
Ortho	3	Ortho	6 1/4
Precision	5	Precision	6 1/4
Quaker	4	Republic EZ	6 1/4
Republic EZ	7 1/4	Scotts AvenGreen	8 1/4
Republic EZ Grow	3	Scotts Drop	6 1/4
Scotts Easy Green	27 1/4	Scotts Even Green	6 1/4
Scotts Speedy Green	5	Vigoro	2 1/4
Scotts Speedy Green 1000	6		
Scotts Speedy Green 2000	7		
Scotts Speedy Green 3000	6		
True Temper	4		
Vigoro	7 1/4		

- 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

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. Guarantee of customer satisfaction to be offered by supplemental registrants:

◆ **The Sta-Green® Promise.**

YOUR SATISFACTION [100%] GUARANTEED OR YOUR MONEY BACK. If you apply Brand Name as directed and are not completely satisfied, just send a proof of purchase from this package and a cash register receipt to the address below. We will promptly send your money back [refund your money].

◆ **LOOK**

For other quality Sta-Green® Lawn and Garden products. For more information about Sta-Green® products, visit us on the Internet at www.fertilizer.com or give our customer service a call at 1-800-874-8892.

II. Advertising claims that may be used: These claims may be presented on the retail container label or on the labeling accompanying the product.

- ◆ Ten pounds covers up to 5,000 square feet.
- ◆ Twenty pounds covers up to 10,000 square feet.
- ◆ Controls dandelion, chickweed, knotweed, plantain, henbit, spurge and many other broadleaf weeds including those listed on the back panel.
- ◆ Covers 5,000 square feet.
- ◆ ~~America's Best Value For All Your Lawn & Garden Needs. Vigoro Lawn Weed Control.~~
- ◆ ~~Top Brand Name Premium Garden Products~~
- ◆ ~~Kills (Controls) these weeds & 150 others~~
- ◆ ~~Visit us on the internet at www.XXXXXXX or call our customer service Hotline at (phone number).~~