

2217-643

7-30-2002

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JUL 30 2002

Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
1217 West 17th Street
Kansas City, MO 64104

Dear Mr. Martens:

Subject: Conversion From MCPP to MCPP-p
Trimec Weed and Feed 24B
EPA Registration Number: 2217-643
Your Submission Dated May 1, 2002

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 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 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.

Copies of the revised basic Confidential Statement of Formula 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.

107. Cooke
7-30-02

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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 TRIMEC® WEED & FEED 24B

20-10-5

ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid	0.55%
(+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid.....	0.12%
Dicamba: 3,6-dichloro-o-anisic acid	0.05%
INERT INGREDIENTS:	99.28%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 11.0 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.
- 2.4 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per ton.
- 1.0 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.

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.

2217-643

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 (16, 17, 18, 20, 22, 25, 40, 50 or 54) P OUNDS

560/ AP-----
 EPA Reg. No. 2217-643 Amend
 EPA Est. No. 2217-KS-1

MANUFACTURED BY:



Telephone: 1-800-821-7925

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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 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 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.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
<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 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 apply this product to dichondra or carpetgrass. Do not apply this product to 'Floratam' St. Augustinegrass in Florida.

Do not use this product where desirable clovers are present or allow the material to drift onto flowers, vegetables or ornamental shrubbery. Do not apply in areas underlaid by roots of desirable trees or shrubs. 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. Do not apply to newly seeded lawns. During application, close spreader openings when turning to prevent over-application.

INSTRUCTIONS:

Gordon's Trimec® Weed & Feed 24B controls a wide range of lawn weeds including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 20-10-5 fertilizer provides plant nutrients or 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.

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.

Fertilizer 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/>."
- "OR" Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.xxx.com>.

The maximum application rate to turf is 1.2 pounds of 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.

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

The above spreader settings are approximate.

- 16 lb. bag: Calibrate your spreader on 310 sq.ft. and adjust to apply 1.0 lb. of product per 310 sq.ft.
- 17 lb. bag: Calibrate your spreader on 300 sq.ft. and adjust to apply 1.0 lb. of product per 300 sq.ft.
- 18 lb. bag: Calibrate your spreader on 275 sq.ft. and adjust to apply 1.0 lb. of product per 275 sq.ft.
- 20 lb. bag: Calibrate your spreader on 250 sq.ft. and adjust to apply 1.0 lb. of product per 250 sq.ft.
- 22 lb. bag: Calibrate your spreader on 227 sq.ft. and adjust to apply 1.0 lb. of product per 227 sq.ft.
- 25 lb. bag: Calibrate your spreader on 200 sq.ft. and adjust to apply 1.0 lb. of product per 200 sq.ft.
- 40 lb. bag: Calibrate your spreader on 250 sq.ft. and adjust to apply 1.0 lb. of product per 250 sq.ft.
- 50 lb. bag: Calibrate your spreader on 300 sq.ft. and adjust to apply 1.0 lb. of product per 300 sq.ft.
- 54 lb. bag: Calibrate your spreader on 275 sq.ft. and adjust to apply 1.0 lb. of product per 275 sq.ft.

- WEEDS -			
Bedstraw	Ground ivy	Peppergrass	Spurge
Black medic	Healall	Pigweed	Thistle
Buckhorn	Henbit	Plantain	Wild carrot
Burdock	Knotweed	Poison ivy	Wild garlic
Chicory	Lambsquarters	Poison oak	Wild lettuce
Chickweed	Lespedeza	Purslane	Wild onion
Clover	Mallow	Ragweed	Yarrow
Dandelion	Morningglory	Sheep sorrel	
Dock	Oxalis	Speedwell	

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. Container Packaging and Size:

Note to Supplemental Registrants: Select the appropriate bag size and present only the information provided for that bag size on your product labeling. Also, equipment settings of drop spreaders, rotary spreaders, and other granular applicators (pictures or drawings) may be presented on the container labels.

Bag Size, Pounds	Calibration Rate, Pounds/Sq.Ft.	Application Rate, Pounds/1000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.	
			Cool Season Grass	St. Augustinegrass
16	1/310	3.23	5,000	5,000
17	1/300	3.33	5,100	5,100
18	1/275	3.64	5,000	5,000
20	1/250	4.00	5,000	-----
22	1/227	4.40	5,000	-----
25	1/200	5.00	5,000	-----
40	1/250	4.00	10,000	-----
50	1/300	3.33	15,000	-----
54	1/275	3.64	15,000	-----

II. Previously Approved Fertilizer Grades:

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

15-5-7	18-4-6	20-4-10	23-3-3	25-6-4	28-3-3
15-5-8	18-5-10	20-10-5	23-4-5	26-3-3	29-3-4
16-3-5	18-6-12	22-3-16	25-3-3	26-5-3	30-2-4
16-6-8	20-4-4	22-4-4	25-3-5	28-2-14	31-4-4

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.

III. Advertising claims appropriate for the bag size:

- ◆ Prepares your lawn for winter dormancy.
- ◆ The key to a beautiful lawn next spring.
- ◆ Promotes deeper green lawns and early rapid growth.
- ◆ For long lasting results.
- ◆ Controls (Kills) dandelion and other tough broadleaf weeds.
- ◆ *Advisories for fertilizers containing iron:*
 - a) "This product may stain concrete and stone, where spilling occurs, sweep off immediately, then flush with water."
 - b) Sweep all residue from concrete surfaces immediately after application. The iron content in this product will stain sidewalks, patios, driveways, swimming pools and deck coatings if not removed before watering. Seller nor distributor assumes any responsibility for damage incurred to any surface other than product's intended use.
- ◆ ___ pounds of product cover up to ___ square feet of turf
- ◆ Controls (Kills) (desired weed species from attached listing may be inserted here e.g. dandelion, chickweed, knotweed, plantain, henbit, spurge) and many other broadleaf weeds; including those listed on the back panel.
- ◆ Contains Polyon® controlled-release nitrogen.
- ◆ Greens 3X longer.

- ◆ Premium quality
- ◆ What makes Pursell's Polyon® controlled-release nitrogen so unique? Each granule of Polyon® controlled-release nitrogen is encapsulated by our exclusive ultra-thin polymer coating which steadily releases nitrogen into your lawn as your grass needs it. This means your lawn receives a gradual and precise amount of nitrogen. Polyon® controlled-release nitrogen releases in response to temperature rather than moisture so when used as directed, there is virtually no risk of burning or surge growth following heavy rainfall. Your lawn steadily becomes thicker, sturdier and greener.
- ◆ Feeds and greens lawns quickly.
- ◆ Three types of nitrogen for long-lasting results.
- ◆ Satisfaction guaranteed!
- ◆ Greens quick, stays green.
- ◆ Promotes longer-lasting winter hardiness & early spring green-up.
- ◆ This product contains a highly effective weed killer and a winter lawn conditioner.
- ◆ Controls (Kills) a wide spectrum of broadleaf weeds.
- ◆ Provides controlled-release feeding and promotes longer-lasting winter hardiness and drought tolerance.
- ◆ A (Grade ex. 22-3-16) fertilizer helps condition lawns to prevent winter injury.
- ◆ Kills (Controls) over (Number) varieties of weeds while feeding your lawn!
- ◆ Premier formula for weed and feed.
- ◆ A balanced formula for overall lawn health.
- ◆ Long lasting with 2% iron.
- ◆ Controls (kills) dandelion, plantain, and other weeds.
- ◆ Feeds the lawn with two types of nitrogen.
- ◆ Easy application with any type of spreader.
- ◆ Combines a highly effective lawn weed killer and winter lawn conditioner.
- ◆ Always apply with a properly calibrated rotary or drop type fertilizer spreader to distribute the granules evenly. Never apply by hand.
- ◆ Place your spreader on the driveway or other paved surface when filling. This guards against spilling fertilizer on grass. For even coverage, begin walking before you turn spreader to the open position to avoid dropping fertilizer in one spot when the spreader is opened. Be sure the spreader is closed when filling it, when turning to backtrack, or when stopping on the lawn.
- ◆ To avoid gaps and streaks, first spread the border and fill in center with uniform, parallel passes.
- ◆ [Spreader Listing and Graphics]

Rotary Spreaders	Ortho Rotary	Ortho Drop
Republic EZ	True Temper	Scotts Drop (PF)
Ev N Spread	Scotts Speedy Green	Scotts Even Green
Scotts Easy Green	Republic EZ Grow	Garden Plus
Precision	Garden Plus	Scotts AccuGreen
Quaker	Drop Spreaders	

- ◆ Greens up to 3 months.
- ◆ Greens rapidly.
- ◆ 10% slow release nitrogen.
- ◆ 2% iron for dark green turf.
- ◆ 1% iron for greener lawns
- ◆ 12% sulfur
- ◆ 1% iron
- ◆ 1% zinc
- ◆ Homogeneous pellets
- ◆ Non-burning formula
- ◆ Pelletized for easy application.
- ◆ Contains Trimec® herbicide to control (kill) the toughest weeds.
- ◆ 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	Falseflax	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