

SEP 26 2002

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

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p  
Gordon's Trimec Weed and Feed 27  
EPA Registration No. 2217-658  
Your Resubmission Dated September 3, 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 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 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.

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Martens								
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A copy of the revised Confidential Statement of Formula, dated September 3, 2002 has been placed in the Agency's file for the subject product. This CSF supersede all previously submitted CSF's for this product. 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 27 20-10-5

**ACTIVE INGREDIENTS:**

2,4-dichlorophenoxyacetic acid .....	0.62%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.14%
Dicamba: 3,6-dichloro-o-anisic acid .....	0.06%
<b>INERT INGREDIENTS:</b> .....	<u>99.18%</u>
<b>TOTAL</b>	<b>100.00%</b>

**THIS PRODUCT CONTAINS:**

- 12.4 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.
  - 2.8 lbs. 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**

~~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 side panels for additional Precautionary Statements

**NET WEIGHT (15, 16, 17, 18, 20, 30, or 36) POUNDS**

570/ APxxxxxx  
 EPA Reg. No. 2217-658 Amend  
 EPA Est. No. 2217-KS-1

MANUFACTURED BY:



Telephone: 1-800-821-7925

**ACCEPTED  
 with COMMENTS  
 In EPA Letter Dated**

**SEP 26 2002**

EPA Reg. No. 2217-658

**Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
2217-658**

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### WELL-MAINTAINED LAWN BENEFITS OUR ENVIRONMENT.

- ◆ Apply when weeds are young and actively growing.
- ◆ Provides vital nutrients plus time-released nitrogen which encourages grass to fill in bare spots weeds leave behind.
- ◆ Contains sulfur which helps maintain dark green color and encourages plant and root growth.

### GRASS CYCLING AND LAWN BENEFITS

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients will go back into your lawn.

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

- ◆ A 50 foot x 50 foot lawn produces enough oxygen for a family of four.
- ◆ Controls erosion
- ◆ Reduces glare
- ◆ Traps dust, smoke particles and other pollutants
- ◆ Purifies water
- ◆ Reduces noise
- ◆ Improves soil condition
- ◆ Modifies temperature



Professional Lawn Care Association of America



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

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and 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

<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse <b>thoroughly</b> and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, <b>if present</b>, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<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>	

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**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 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. Apply when the air is calm. Treated areas may be seeded 3 to 4 weeks after application. Application of this product to newly seeded areas should be delayed until the third mowing. During application, close spreader openings when turning.

Do not apply this product to dichondra or carpetgrass. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

Gordon's Trimec Weed & Feed 27 is a Trimec® herbicide, a combination of three proven weed killers - 2,4-D, mecoprop and dicamba. Together, they control a wide range of lawn weeds including dandelion, chickweed, knotweed, plantain, henbit, spurge and other broadleaf weeds commonly found in home lawns. In addition, a 20-10-5 fertilizer provides a supply of plant food. 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.

Gordon's Trimec Weed & Feed 27 controls broadleaf weeds commonly found in cool season and warm season turfgrass established in residential lawns. Established turf of Kentucky bluegrass, fescues, and perennial ryegrass may be treated. Established turf of bermudagrass, bahiagrass, buffalograss, zoysiagrass, St. Augustinegrass, and centipedegrass may be treated.

The maximum application rate to turf is 1.0 pound 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.

**CALIBRATION INSTRUCTIONS:**

To provide proper distribution, calibrate spreader before application.

- Always apply with a properly calibrated rotary or drop 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, when turning to backtrack, or when stopping.

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

The above spreader settings are approximate.

**15 & 30 lb. bags:** Calibrate your spreader on 330 square feet and adjust to apply at the rate of 1 pound of product per 330 square feet.

**16 & 17 lb. bags:** Calibrate your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.

**18, 20, 36 & 50 lb. bags:** Calibrate your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.

**DISTRIBUTION AND SPREADER PATTERNS:**

**Coverage** - To determine how much you need to apply, multiply the length of your lawn by its width. This equals your total square footage. Deduct all non-lawn areas (house, gardens, etc.). One bag covers up to XXX square feet. *[Graphics Optional]*

**SINGLE PASS DISTRIBUTION:**

First spread the borders of your lawn. Then spread the center by spreading in straight line passes. Spread at a uniform walking speed to insure even coverage *[Graphics Optional]*. To avoid gaps and streaks, first spread the border and fill in center with uniform, parallel passes.

FERTILIZER ANALYSIS	
Total Nitrogen (N).....	xx%
Water Insoluble Nitrogen.....	xx%
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ).....	x%
Soluble Potash (K <sub>2</sub> O).....	x%

**NOTE:** Fertilizer grades with nutrient contents expressed as the percentages of N, P<sub>2</sub>O<sub>5</sub> and K<sub>2</sub>O may include the following: 20-10-5, and x-x-x. The fertilizer grade analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.

**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/>."

**Advisory For Fertilizers Containing Iron:**

Keep this product off sidewalks, patios, driveways, etc. This fertilizer contains iron which will stain concrete and painted surfaces. If it comes in contact with concrete surfaces, sweep off immediately before flushing with water. If concrete is wet when contact occurs, staining may be impossible to prevent. Be careful when using rotary spreaders which scatter fertilizer beyond lawn edge and onto concrete.

**Labeling requirement for fertilizers sold and/or distributed in Texas:**

Information about the contents of this product may be obtained by writing to: (Company name and address).

**- BROADLEAF 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



**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, P<sub>2</sub>O<sub>5</sub>, and K<sub>2</sub>O include the following:

10-6-4	20-10-5	25-3-5	28-3-4	33-3-5
18-3-5	21-3-3	26-3-3	28-3-7	
18-8-20	22-3-4	26-4-6	29-3-4	
19-3-12	24-4-8	27-3-5	30-3-5	

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.

**II. Previously approved retail container package sizes include:** 15, 16, 17, 18, 19, 20, 30, 36, 45, 48, 50, 54, and 60 pounds.

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

- ◆ Controls dandelion, chickweed, knotweed, plantain, henbit, spurge and many other broadleaf weeds; some of which are listed on the back panel.
- ◆ (Fifteen, Sixteen, Seventeen, Eighteen, or Twenty) pounds covers up to 5,000 square feet.
- ◆ (Thirty or Thirty-Six) pounds covers up to 10,000 square feet.
- ◆ Greens and thickens turf.
- ◆ Homogenous based granules for better weed control.
- ◆ Provides both fast greening and extended feeding nitrogen.
- ◆ Encourages a thicker, greener lawn while killing weeds.
- ◆ 50 pounds of product: treats [covers] up to 13,750 sq. ft.
- ◆ Combines a highly effective herbicide and winter lawn conditioner.

**Quick and easy application for lasting results**