

PM 178

MAR 12 1997

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Mr. Craig Martens  
 PBI/Gordon Corporation  
 1217 West 12th Street  
 P.O. Box 14090  
 Kansas City, Missouri 64101

Dear Mr. Martens:

SUBJECT: Label Amendment Adding Reduced Use Rates and Clarifying  
 Calibration Instructions for Granular Application  
 Equipment.

Gordon's Trimec Weed and Feed 33 1/2  
 EPA Registration No. 2217-660  
 Your Application Dated February 17, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you make the following change:

1. On page 2, in the "INSTRUCTIONS" under "OPTION 1", correct the statement in parentheses at the end of step 2. It should read "see step 5".

A stamped copy 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)  
 Fungicide-Herbicide Branch  
 Registration Division (7505C)

Enclosure

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #5:S519911.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Mar 12, 1997							

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# GORDON'S TRIMEC® WEED & FEED 33½ 24-4-8

(Fifteen, Sixteen, Seventeen, or Eighteen) Pounds Covers Up To 5,000 Square Feet.  
Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge  
and many other broadleaf weeds including those listed on the back panel.

### ACTIVE INGREDIENTS:

*2,4-Dichlorophenoxyacetic acid .....	0.761%
**2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.341%
***Dicamba: 3,6-dichloro-o-anisic acid.....	0.072%
INERT INGREDIENTS.....	98.826%

TOTAL 100.000%

### THIS PRODUCT CONTAINS:

- \*15.22 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per ton
  - \*\*6.82 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton
  - \*\*\*1.44 lbs. 3,6-dichloro-o-anisic acid equivalent per ton
- Isomer Specific by AOAC Methods.  
TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated

MAR 12 1997

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
2217-660

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

### Statement of Practical Treatment

- IF ON SKIN:** Wash with plenty of soap and water. Get medical attention if irritation persists.
- IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.

See back panel for additional Precautionary Statements.

**NET WEIGHT (15, 16, 17, OR 18) POUNDS**

578/ APXXXXXX  
EPA REG. NO. 2217-860  
EPA EST. NO. 2217-KS-1  
MANUFACTURED BY





3/8  
**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.

**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. Do not apply when weather conditions favor drift from target area.

## OPTION 1

### 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.

**PESTICIDE DISPOSAL:** Securely wrap bag in several layers of newspaper and discard in trash.

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

**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 wind-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. Do not apply to newly seeded lawns. During application, close spreader openings when turning.

**INSTRUCTIONS:** Gordon's Trimec Weed & Feed 33½ is a Trimec® complex, 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, plantains, henbit, spurge and many others commonly found in home lawns. In addition, a 24-4-8 fertilizer provides a balanced supply of plant nutrients ~~needed for a normal season's growth~~. 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.

~~Apply 3.0 to 3.64 pounds of product per 1,000 square feet of turfgrass.~~ A second application may be made in approximately 30 days.

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 to 2 days 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. Avoid applying when temperatures are consistently above 90°F.
5. 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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**CALIBRATION INSTRUCTIONS:** Refer to the rate table for the area to be treated.

- ◆ For 3.0 lbs. of product per 1,000 sq. ft. of turfgrass. Check your spreader on 333 sq. ft. and adjust to apply at the rate of 1 lb. of product per 333 sq. ft.
- ◆ For 3.2 lbs. of product per 1,000 sq. ft. of turfgrass. Check your spreader on 310 sq. ft. and adjust to apply at the rate of 1 lb. of product per 310 sq. ft.

Spreader settings for 1.0 lb. of product per 310 sq. ft.	
Scotts EasyGreen® Rotary .....	26
Scotts Drop.....	5
Scotts SpeedyGreen® Rotary.....	3½
GreenView Drop (Spred II).....	4
Central Drop (#205).....	5½
Sears Drop (#19810).....	4
Ortho Drop (#5000).....	5
Precision Drop (Red Devil).....	4

- ◆ For 3.4 lbs. of product per 1,000 sq. ft. of turfgrass. Check your spreader on 300 sq. ft. and adjust to apply at the rate of 1 lb. of product per 300 sq. ft.
- ◆ For 4.0 lbs. of product per 1,000 sq. ft. of turfgrass. Check your spreader on 275 sq. ft. and adjust to apply at the rate of 1 lb. of product per 275 sq. ft.

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

- WEEDS -		
Bedstraw	Knotweed	Ragweed
Black Medic	Lambsquarters	Sheep Sorrel
Buckhorn	Lespedeza	Shepherdspurse
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Oxalis	Thistle
Clover	Peppergrass	Wild Carrot
Dandelion	Pigweed	Wild Garlic
Dock	Plantains	Wild Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow
Henbit	Purslane	

**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.

**OPTION 2. Optional Use Directions**

**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 dust has settled.

**INSTRUCTIONS:** Gordon's Trimec Weed & Feed 33½ controls a wide range of lawn weeds, including dandelion, chickweed, knotweed, plantains, henbit, spurge and many others commonly found in home lawns. In addition, a 24-4-8 fertilizer provides a balanced supply of plant plant ~~nutrients~~ **nutrients** food needed for a normal season's growth.

KEYS FOR SUCCESS	CALIBRATION
◆ Use when weeds are young and actively growing.	Measure your lawn. For example 20' X 50' equals 1,000 square feet.
◆ Mow lawn to normal height 1 to 2 days before application. Water thoroughly before application to sustain moisture until the next watering.	Make sure your spreader is dry. If spreader is not listed below, adjust to apply 1 pound of product per 280 square feet (28' X 10"). 18 pounds will cover 5,000 square feet.
◆ Apply preferably in the morning, when grass is moist from dew, or sprinkle lightly. Water will hold the particles on the foliage and prevent dust drift on to nontarget plants. Apply when air is calm. During application, close spreader openings when turning.	The spreader settings are only approximate. Drop Spreader Settings: Republic EZ Drop/ 4% Scotts 5% Sears, K-Gro 4% True Temper 3% Red Devil 8% Old or rusty spreaders will discharge products at different rates.
◆ Do not water treated area for 1 to 2 days after application. Then water thoroughly.	The spreader settings are only approximate. Rotary Spreader Settings Republic EZ Rotary 2% Scotts Easy Green 2% Scotts Speedy Green 5% Republic EZ Grow 5% Cyclone, True Temper 3% Red Devil 5 Sears, K-Gro 2% Ortho Whirlybird 2%
◆ Use Precautions: Do not use on desirable clovers, dichondra, carpetgrass, closely mowed bentgrass or St. Augustinegrass. Do not use or allow the material to wind drift onto flowers, vegetables or ornamental shrubbery. Do not apply in areas over root systems of desirable trees or shrubs. Do not apply to newly seeded lawns until after the third mowing.	

If necessary, reapply in approximately 30 days, if lawn is heavily overrun by weeds, or if adverse low moisture conditions prevail.

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.

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CONTROLS:		
Bedstraw	Knotweed	Ragweed
Black Medic	Lambsquarters	Sheep Sorrel
Buckhorn	Lespedeza	Shepherdspurse
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Oxalis	Thistle
Clover	Peppergrass	Wild Carrot
Dandelion	Pigweed	Wild Garlic
Dock	Piantains	Wild Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow
Henbit	Purslane	

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

**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.

**PESTICIDE DISPOSAL:** Securely wrap bag in several layers of newspaper and discard in trash.

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

————— *End of Option 2* —————

**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 may be presented on the container labels.

Bag Size Pounds	Application Rate Pounds/1000 Sq. Ft.	Treated Area for This Bag Size Square Feet
55	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200
100	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200
150	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200
180	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200

**II. 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:

0-6-3	5-1-1	6-4-3	20-1-1
2-3-3	5-1-4	10-3-4	
2-1-5	6-1-6	10-1-3	
1-1-7	6-1-4	10-4-1	

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.

2-3-7 GUARANTEED ANALYSIS	
Total Nitrogen (N)	23%
Water Insoluble Nitrogen	8%
Available Phosphate (P <sub>2</sub> O <sub>5</sub> )	9%
Soluble Potash (K <sub>2</sub> O)	7%

**III. The addition of advertising claims by supplemental registrants that may be presented on the retail containers:**

- ◆ Long lasting, lush green lawn.
- ◆ Stimulates deep greening.
- ◆ Stimulates early, vigorous root growth.
- ◆ Stimulates thick, lush grass blades.
- ◆ Ortho product quality you've come to trust.
- ◆ One-step application for a lush green lawn.
- ◆ Fast deep greening balanced with long-term feeding by patented Polyon<sup>®</sup> coated fertilizer technology.

- ◆ Small particle size for uniform coverage to control a wide range of weeds.
- ◆ Patented Polyon® coated fertilizer technology for timed release of fertilizer.
- ◆ Polyon® coating prevents burning.
- ◆ Scientific blend of small particles promotes fast deep greening and balanced long term feeding.
- ◆ Outdoor use only
- ◆ Satisfaction guaranteed\* or your purchase price refunded with proof-of-purchase and original cash register receipt.
- ◆ Controls broadleaf lawn weeds.
- ◆ Controls 35 common lawn weeds including dandelion and clover.
- ◆ Feeds up to 8 weeks
- ◆ These products are the quality choice in complete lawn care. You determine what your lawn needs, and you'll find a product to help you. Fertilizers, lawn starters, crabgrass prevention, weed and insect control... everything for a lush green lawn and year-round protection. Each one is easy to apply and guaranteed to produce quick, long-lasting results.
- ◆ This product is designed to be used in the spring, when weeds are actively growing.
- ◆ The fertilize combination of nitrogen, phosphate, and potash gives your lawn strength above and below the surface. This product promotes root and rhizome development, helping the grass to produce more blades. The result is a thicker, greener lawn.
- ◆ With the right weather conditions and correct application, your lawn will be greener and thin areas of dirt will fill in, making the density of your lawn more uniform.
- ◆ An easy guide to timing your application is to look for dandelions on your lawn.
- ◆ This product can be applied in the fall when weeds are actively growing. Because plants are taking nutrients into their roots at this time of year, it's easier to control some weeds in the fall than in the spring.
- ◆ This product makes it easier to have a lush, green lawn. Our four (4) simple applications eliminate the guesswork and give you professional lawn care results. Each stage combines just the right amount of fertilizer with the right amount of control and prevention. Just match each stage to the correct season and you'll prevent crabgrass, control weeds and insects, and prepare your lawn for the winter. It's what your lawn needs for strong growth.
- ◆ Stage One is a preemergent. Stage Two is a broadleaf postemergent. Stage Three is an insecticide. Stage Four is a fall broadleaf postemergent.

**IV. Addition of a referral claim: "To spot treat individual weeds, use Ortho Weed-B-Gon Weed Killer®".**