

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 23 2002

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

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
Gordon's Trimec Weed and Feed 33 ½
EPA Registration No. 2217-660
Your Resubmission Dated August 16, 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.

7505C Wetjen 8/23/02								
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A copy of the revised Confidential Statement of Formula, dated April 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

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

ACTIVE INGREDIENTS:

2,4-D	0.76%
Mecoprop-p	0.17%
Dicamba	0.07%

OTHER INGREDIENTS:	<u>99.00%</u>
TOTAL	100.000%

THIS PRODUCT CONTAINS:

15.2 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton
 3.4 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton
 1.4 lbs. 3,6-dichloro-o-anisic acid equivalent per ton
 Isomer Specific by AOAC Methods
 Contains singler isomer form of Mecoprop-p
 TRIMEC[®] is a registered trademark of PBI/GORDON CORPORATION

CAS Registry Numbers:

2,4-D CAS# 94-75-7
 Mecoprop-p CAS# 16484-77-8
 Dicamba CAS# 1918-00-9

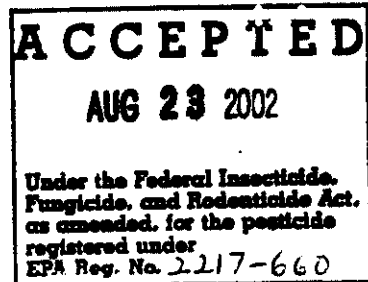
KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional Precautionary Statements.

NET WEIGHT: _____ POUNDS

578 APXXXXXX
 EPA REG NO 2217-660 Amend
 EPA EST NO 2217-KS-1
 MANUFACTURED BY:





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	
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.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.</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.

5/23

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.

CONTAINER DISPOSAL: **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 on dichondra, carpetgrass or St. Augustinegrass.

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. 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-p and Dicamba. Together, they control a wide range of lawn weeds, including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 24-4-8 fertilizer provides a supply of plant nutrients. 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 2.4 to 3.6 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.

WHEN TO APPLY:

Apply when broadleaf weeds are actively growing in spring or early fall.

WHAT TO EXPECT:

Weed stems and leaves will begin to twist and curl in a few days, but a month or more may be required for complete control. This product will not prevent weed seeds from producing new plants.

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 5).
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.

CALIBRATION INSTRUCTIONS:

To provide proper distribution, calibrate spreader before application. [Refer to table for appropriate bag sizes.]

- ◆ For 2.4 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 420 square feet and adjust to apply at the rate of 1 pound of product per 420 square feet.
- ◆ For 2.6 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 385 square feet and adjust to apply at the rate of 1 pound of product per 385 square feet.
- ◆ For 2.8 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 360 square feet and adjust to apply at the rate of 1 pound of product per 360 square feet.
- ◆ For 3.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 333 square feet and adjust to apply at the rate of 1 pound of product per 333 square feet.
- ◆ For 3.2 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.

Spreader settings for 1.0 pound of product per 310 square feet	
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 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 300 square feet and adjust to apply at the rate of 1 pound of product per 300 square feet.
- ◆ For 3.6 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.

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, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
12	2.4	5,000
	2.6	4,600
	2.8	4,300
	3.0	4,000
	3.2	3,800
	3.4	----
	3.6	----
13	2.4	5,400
	2.6	5,000
	2.8	4,600
	3.0	4,300
	3.2	4,100
	3.4	3,800
	3.6	3,600
14	2.4	5,800
	2.6	5,400
	2.8	5,000
	3.0	4,700
	3.2	4,400
	3.4	4,100
	3.6	3,900
15	2.4	6,300
	2.6	5,800
	2.8	5,400
	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200
16	2.4	6,700
	2.6	6,200
	2.8	5,700
	3.0	5,300
	3.2	5,000
	3.4	4,700
	3.6	4,400
17	2.4	7,100
	2.6	6,500
	2.8	6,100
	3.0	5,700
	3.2	5,300
	3.4	5,000
	3.6	4,700
18	2.4	7,500
	2.6	6,900
	2.8	6,400
	3.0	6,000
	3.2	5,600
	3.4	5,300
	3.6	5,000

8/23

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
24	2.4	10,000
	2.6	9,200
	2.8	8,600
	3.0	8,000
	3.2	7,500
	3.4	7,100
	3.6	6,700
25	2.4	10,400
	2.6	9,600
	2.8	8,900
	3.0	8,300
	3.2	7,800
	3.4	7,400
	3.6	6,900
26	2.4	10,800
	2.6	10,000
	2.8	9,300
	3.0	8,700
	3.2	8,100
	3.4	7,600
	3.6	7,200
28	2.4	11,700
	2.6	10,800
	2.8	10,000
	3.0	9,300
	3.2	8,800
	3.4	8,200
	3.6	7,800
36	2.4	15,000
	2.6	13,800
	2.8	12,900
	3.0	12,000
	3.2	11,300
	3.4	10,500
	3.6	10,000
37	2.4	15,400
	2.6	14,200
	2.8	13,200
	3.0	12,300
	3.2	11,600
	3.4	10,900
	3.6	10,300
39	2.4	16,300
	2.6	15,000
	2.8	13,900
	3.0	13,000
	3.2	12,200
	3.4	11,500
	3.6	10,800
42	2.4	17,500
	2.6	16,200
	2.8	15,000
	3.0	14,000
	3.2	13,100
	3.4	12,400
	3.6	11,700

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
43	2.4	17,900
	2.6	16,500
	2.8	15,400
	3.0	14,300
	3.2	13,400
	3.4	12,600
	3.6	11,900
48	2.4	20,000
	2.6	18,500
	2.8	17,100
	3.0	16,000
	3.2	15,000
	3.4	14,100
49	3.6	13,300
	2.4	20,400
	2.6	18,800
	2.8	17,500
	3.0	16,300
	3.2	15,300
	3.4	14,400
	3.6	13,600

DISTRIBUTION AND SPREADER PATTERNS:

Always apply with a properly calibrated rotary or drop type fertilizer spreader to distribute the granules evenly. Never apply by hand.

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.

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.

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

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

Referrals to other sequentially used products:

- For best results, apply (brand name) products.
- Apply using the 4-Step Program
- **4-Step Program:**
 - STEP 1:* Menards Premium Crabgrass Preventor - Apply March - early May - Prevents crabgrass, foxtail, goosegrass, *poa annua* and other annual weed grasses. - Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
 - STEP 2:* Menards Premium Weed & Feed - Apply May - June - Kills dandelion, clover, plantain and over XXX other broadleaf weeds. - Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
 - STEP 3:* Menards Premium Lawn Food - Apply June - August - Nourishes your lawn throughout the summer months with extended feeding of Nitrogen. - Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
 - STEP 4:* Menards Premium Winterizer & Weed Control - Apply late August - mid October - Kills dandelion, clover, plantain and over XXX other broadleaf weeds. - Maximizes root building. - Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
- OR**
- STEP 4:* Menards Premium Starter & Winterizer - Apply late August - November - Maximizes root building. - Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening. - Use with new seeding and sodding of turfgrass.

- BROADLEAF WEEDS -

Annual yellow sweetclover	Cocklebur	Mustard	Spiny amaranth
Aster	Common mullein	Narrowleaf plantain	Spiny cocklebur
Austrian fieldcress	Creeping jenny	Narrowleaf vetch	Spiny sowthistle
Bedstraw	Cudweed	Nettle	Spotted catsear
Beggarticks	Curly dock	Orange hawkweed	Spotted spurge
Betony, Florida	Daisy, English	Oriental cocklebur	Spurweed
Bindweed, field	Daisy fleabane	Oxalis	Stinging nettle
Bird vetch	Daisy, oxeye	Parsley-piert	Strawberry, India mock
Bitter wintercress	Dandelion	Parsnip	Tall nettle
Bittercress, hairy	Dichondra	Pearlwort	Tall vervain
Bitterweed	Dogbane	Pennycress	Tansy ragwort
Black-eyed Susan	Dogfennel	Pennywort	Tansy mustard
Black medic	Dollarweed	Peppergrass	Tanweed
Black mustard	False dandelion	Pepperweed	Thistle
Blackseed plantain	Falseflax	Pigweed	Trailing crownvetch
Blessed thistle	False sunflower	Pineywoods bedstraw	Tumble mustard
Bloodflower milkweed	Fiddleneck	Plains tickseed	Tumble pigweed
Blue lettuce	Florida pusley	Plantain	Velvetleaf
Blue vervain	Frenchweed	Poison ivy	Venice mallow
Bracted plantain	Galinsoga	Poison oak	Virginia buttonweed
Bristly oxtongue	Goathead	Pokeweed	Virginia creeper
Broadleaf dock	Goldenrod	Poorjoe	Virginia pepperweed
Broadleaf plantain	Ground ivy	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Gumweed	Prickly lettuce	Western clematis
Buckhorn	Hairy fleabane	Prickly sida	Western salsify
Buckhorn plantain	Hawkweed	Prostrate knotweed	White mustard
Bulbous buttercup	Healall	Prostrate pigweed	Wild aster
Bull thistle	Heartleaf drymary	Prostrate spurge	Wild buckwheat
Bullnettle	Heathaster	Prostrate vervain	Wild carrot
Burclover	Hedge bindweed	Puncturevine	Wild four-o'clock
Burdock	Hedge mustard	Purslane, common	Wild garlic
Burning nettle	Hemp	Ragweed	Wild geranium
Burweed	Henbit	Red sorrel	Wild lettuce
Buttercup	Hoary cress	Redroot pigweed	Wild marigold
Buttonweed	Hoary plantain	Redstem filaree	Wild mustard
Canada thistle	Hoary vervain	Rough cinquefoil	Wild onion
Carolina geranium	Horsenettle	Rough fleabane	Wild parsnip
Carpetweed	Jimsonweed	Russian pigweed	Wild radish
Catchweed bedstraw	Knawel	Russian thistle	Wild rape
Catnip	Knotweed	Scarlet pimpernel	Wild strawberry
Catsear	Kochia	Scotch thistle	Wild sweet potato
Chickweed, common	Lambsquarters	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lespedeza	Shepherdspurse	Woodsorrel
Chicory	Mallow	Slender plantain	Woolly croton
Cinquefoil	Matchweed	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Mexicanweed	Smooth dock	Woolly plantain
Clover, hop	Milk vetch	Smooth pigweed	Wormseed
Clover, red	Morningglory	Sorrel	Yarrow
Clover, strawberry	Mouseear hawkweed	Sowthistle	Yellow rocket
Clover, sweet	Mugwort	Spanishneedles	Yellowflower pepperweed
Clover, white	Musk thistle	Speedwell	and other broadleaf weeds
Cockle			

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.

----- END OF OPTION 1 -----

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, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 24-4-8 fertilizer provides a supply of plant nutrients.

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. <i>Drop Spreader Settings:</i> Republic EZ Drop/ 4¾ Scotts 5¾ Sears, K-Gro 4¾ True Temper 3¾ Red Devil 8½ 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. <i>Rotary Spreader Settings</i> Republic EZ Rotary 2¾ Scotts Easy Green 26 Scotts Speedy Green 5½ Republic EZ Grow 5¾ Cyclone, True Temper 3¾ Red Devil 5 Sears, K-Gro 2¾ Ortho Whirlybird 2½
◆ 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.

- BROADLEAF WEEDS -

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Burdock	Hedge mustard	Purslane, common	Wild garlic
Burning nettle	Hemp	Ragweed	Wild geranium
Burweed	Henbit	Red sorrel	Wild lettuce
Buttercup	Hoary cress	Redroot pigweed	Wild marigold
Buttonweed	Hoary plantain	Redstem filaree	Wild mustard
Canada thistle	Hoary vervain	Rough cinquefoil	Wild onion
Carolina geranium	Horsenettle	Rough fleabane	Wild parsnip
Carpetweed	Jimsonweed	Russian pigweed	Wild radish
Catchweed bedstraw	Knawel	Russian thistle	Wild rape
Catnip	Knotweed	Scarlet pimpernel	Wild strawberry
Catsear	Kochia	Scotch thistle	Wild sweet potato
Chickweed, common	Lambsquarters	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lespedeza	Shepherdspurse	Woodsorrel
Chicory	Mallow	Slender plantain	Woolly croton
Cinquefoil	Matchweed	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Mexicanweed	Smooth dock	Woolly plantain
Clover, hop	Milk vetch	Smooth pigweed	Wormseed
Clover, red	Morningglory	Sorrel	Yarrow
Clover, strawberry	Mouseear hawkweed	Sowthistle	Yellow rocket
Clover, sweet	Mugwort	Spanishneedles	Yellowflower pepperweed
Clover, white	Musk thistle	Speedwell	and other broadleaf weeds
Cockle			

24-4-8 GUARANTEED ANALYSIS	
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Available Phosphate (P ₂ O ₅).....	4%
Soluble Potash (K ₂ O).....	8%

Fertilizer Labeling Requirements:

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

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.

CONTAINER DISPOSAL: 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.

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.

----- END OF OPTION 2 -----

16/23

OPTION 3: OPTIONAL USE DIRECTION FOR THE SCOTTS COMPANY

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.

CONTAINER DISPOSAL: **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 on dichondra, carpetgrass or St. Augustinegrass.

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. 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-p and Dicamba. Together, they control a wide range of lawn weeds, including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 24-4-8 fertilizer provides a supply of plant nutrients. 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 2.4 to 3.6 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.

HOW AND WHEN TO APPLY:

Apply when broadleaf weeds are actively growing in spring or early fall.

WHAT TO EXPECT:

Weed stems and leaves will begin to twist and curl in a few days, but a month or more may be required for complete control. This product will not prevent weed seeds from producing new plants.

- Mow lawn to normal height 1 to 2 days before application.
- Water lawn thoroughly at least 1 to 2 days before application to sustain moisture until the next watering (see 4th bullet).
- 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
- Do not wash from weed leaves for 1 to 2 days after application. At this time, a thorough watering should be made.
- Avoid applying when temperatures are consistently above 90°F.

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, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
12	2.4	5,000
	2.6	4,600
	2.8	4,300
	3.0	4,000
	3.2	3,800
	3.4	----
	3.6	----
13	2.4	5,400
	2.6	5,000
	2.8	4,600
	3.0	4,300
	3.2	4,100
	3.4	3,800
	3.6	3,600
14	2.4	5,800
	2.6	5,400
	2.8	5,000
	3.0	4,700
	3.2	4,400
	3.4	4,100
	3.6	3,900
15	2.4	6,300
	2.6	5,800
	2.8	5,400
	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200
16	2.4	6,700
	2.6	6,200
	2.8	5,700
	3.0	5,300
	3.2	5,000
	3.4	4,700
	3.6	4,400
17	2.4	7,100
	2.6	6,500
	2.8	6,100
	3.0	5,700
	3.2	5,300
	3.4	5,000
	3.6	4,700
18	2.4	7,500
	2.6	6,900
	2.8	6,400
	3.0	6,000
	3.2	5,600
	3.4	5,300
	3.6	5,000

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
24	2.4	10,000
	2.6	9,200
	2.8	8,600
	3.0	8,000
	3.2	7,500
	3.4	7,100
	3.6	6,700
25	2.4	10,400
	2.6	9,600
	2.8	8,900
	3.0	8,300
	3.2	7,800
	3.4	7,400
	3.6	6,900
26	2.4	10,800
	2.6	10,000
	2.8	9,300
	3.0	8,700
	3.2	8,100
	3.4	7,600
	3.6	7,200
28	2.4	11,700
	2.6	10,800
	2.8	10,000
	3.0	9,300
	3.2	8,800
	3.4	8,200
	3.6	7,800
36	2.4	15,000
	2.6	13,800
	2.8	12,900
	3.0	12,000
	3.2	11,300
	3.4	10,500
	3.6	10,000
37	2.4	15,400
	2.6	14,200
	2.8	13,200
	3.0	12,300
	3.2	11,600
	3.4	10,900
	3.6	10,300
39	2.4	16,300
	2.6	15,000
	2.8	13,900
	3.0	13,000
	3.2	12,200
	3.4	11,500
	3.6	10,800
42	2.4	17,500
	2.6	16,200
	2.8	15,000
	3.0	14,000
	3.2	13,100
	3.4	12,400
	3.6	11,700

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
43	2.4	17,900
	2.6	16,500
	2.8	15,400
	3.0	14,300
	3.2	13,400
	3.4	12,600
	3.6	11,900
48	2.4	20,000
	2.6	18,500
	2.8	17,100
	3.0	16,000
	3.2	15,000
	3.4	14,100
	3.6	13,300
49	2.4	20,400
	2.6	18,800
	2.8	17,500
	3.0	16,300
	3.2	15,300
	3.4	14,400
	3.6	13,600

SPREADING TIPS:

To provide proper distribution, calibrate spreader before application.

For best results, use a Scotts® Spreader.

Spreader Settings		DIRECTIONS
Scotts AccuGreen® Drop Spreaders	X	Mow lawn first: apply 2 header strips; apply longest direction of lawn, overlapping wheel marks.
Scotts PrecisionGreen® Drop Spreader	X x/x	Mow lawn first: apply 2 header strips; apply longest direction of lawn, overlapping wheel marks.
Scotts SpeedyGreen® & EdgeGuard® Rotary Spreaders	X	Make each pass about 5 feet from previous pass to overlap spread width.
Scotts EasyGreen® Rotary	X	Make each pass about 30 inches from previous pass to overlap spread width.

[Optional Direction Illustrations May Be Presented]

Additional Spreader Settings:

- EZ Drop, Republic (# 530)..... X
- EZ Broadcast, Republic (# 540)..... X x/x
- Scotts Broadcast, Tractor Spreader..... X

(Non-Scotts spreader settings are approximate. You may need to adjust for proper coverage. Check your spreader on xxx sq.ft. and adjust to apply at the rate of 1 pound of product per xxx sq.ft.)

[Note to Supplemental Registrants: Refer to table for appropriate bag sizes.]

- For 2.4 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 420 sq.ft. and adjust to apply at the rate of 1 lb. of product per 420 sq.ft.
- For 2.6 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 385 sq.ft. and adjust to apply at the rate of 1 lb. of product per 385 sq.ft.

- For 2.8 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 360 sq.ft. and adjust to apply at the rate of 1 lb. of product per 360 sq.ft.
- For 2.8 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 360 sq.ft. and adjust to apply at the rate of 1 lb. of product per 360 sq.ft.
- 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.
- 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 3.6 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.

GUARANTEED ANALYSIS XX-X-X

Total Nitrogen (N).....	XX%
x.x% ammoniacal nitrogen	
x.x% urea nitrogen*	X%
Available Phosphate (P ₂ O ₅).....	X%
Soluble Potash (K ₂ O).....	X%
Sulfur (S).....	X%
x.x% free sulfur (S)	

Derived from: polymer-coated sulfur-coated urea, urea, ammonium phosphate, potassium chloride.

*A portion of the urea has been coated to provide x.x% coated slow-release nitrogen.

This product and/or its manufacture is covered by one or more of the following U.S. patents and international counterparts thereof: US Patent Nos: 5,219,465; 5,300,135; 5,405,426; 5,466,274.

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

- BROADLEAF WEEDS -

Annual yellow sweetclover	Cocklebur	Mustard	Spiny amaranth
Aster	Common mullein	Narrowleaf plantain	Spiny cocklebur
Austrian fieldcress	Creeping jenny	Narrowleaf vetch	Spiny sowthistle
Bedstraw	Cudweed	Nettle	Spotted catsear
Beggarticks	Curly dock	Orange hawkweed	Spotted spurge
Betony, Florida	Daisy, English	Oriental cocklebur	Spurweed
Bindweed, field	Daisy fleabane	Oxalis	Stinging nettle
Bird vetch	Daisy, oxeye	Parsley-piert	Strawberry, India mock
Bitter wintercress	Dandelion	Parsnip	Tall nettle
Bittercress, hairy	Dichondra	Pearlwort	Tall vervain
Bitterweed	Dogbane	Pennycress	Tansy ragwort
Black-eyed Susan	Dogfennel	Pennywort	Tansy mustard
Black medic	Dollarweed	Peppergrass	Tanweed
Black mustard	False dandelion	Pepperweed	Thistle
Blackseed plantain	Falseflax	Pigweed	Trailing crownvetch
Blessed thistle	False sunflower	Pineywoods bedstraw	Tumble mustard
Bloodflower milkweed	Fiddleneck	Plains tickseed	Tumble pigweed
Blue lettuce	Florida pusley	Plantain	Velvetleaf
Blue vervain	Frenchweed	Poison ivy	Venice mallow
Bracted plantain	Galinsoga	Poison oak	Virginia buttonweed
Bristly oxtongue	Goathead	Pokeweed	Virginia creeper
Broadleaf dock	Goldenrod	Poorjoe	Virginia pepperweed
Broadleaf plantain	Ground ivy	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Gumweed	Prickly lettuce	Western clematis
Buckhorn	Hairy fleabane	Prickly sida	Western salsify
Buckhorn plantain	Hawkweed	Prostrate knotweed	White mustard
Bulbous buttercup	Healall	Prostrate pigweed	Wild aster
Bull thistle	Heartleaf drymary	Prostrate spurge	Wild buckwheat
Bullnettle	Heathaster	Prostrate vervain	Wild carrot
Burclover	Hedge bindweed	Puncturevine	Wild four-o'clock
Burdock	Hedge mustard	Purslane, common	Wild garlic
Burning nettle	Hemp	Ragweed	Wild geranium
Burweed	Henbit	Red sorrel	Wild lettuce
Buttercup	Hoary cress	Redroot pigweed	Wild marigold
Buttonweed	Hoary plantain	Redstem filaree	Wild mustard
Canada thistle	Hoary vervain	Rough cinquefoil	Wild onion
Carolina geranium	Horsenettle	Rough fleabane	Wild parsnip
Carpetweed	Jimsonweed	Russian pigweed	Wild radish
Catchweed bedstraw	Knawel	Russian thistle	Wild rape
Catnip	Knotweed	Scarlet pimpernel	Wild strawberry
Catsear	Kochia	Scotch thistle	Wild sweet potato
Chickweed, common	Lambsquarters	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lespedeza	Shepherdspurse	Woodsorrel
Chicory	Mallow	Slender plantain	Woolly croton
Cinquefoil	Matchweed	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Mexicanweed	Smooth dock	Woolly plantain
Clover, hop	Milk vetch	Smooth pigweed	Wormseed
Clover, red	Morningglory	Sorrel	Yarrow
Clover, strawberry	Mouseear hawkweed	Sowthistle	Yellow rocket
Clover, sweet	Mugwort	Spanishneedles	Yellowflower pepperweed
Clover, white	Musk thistle	Speedwell	and other broadleaf weeds
Cockle			

----- END OPTION 3 -----

APPENDIX

I. Container Packaging and Size:

Approved retail container package sizes include: 12, 13, 14, 15, 16, 17, 18, 24, 25, 26, 28, 34, 36, 37, 39, 42, 43, 48, and 49 pounds.

II. Previously Approved Fertilizer Grades: Fertilizer grades with nutrient contents expressed as the percentages of N, P₂O₅, and K₂O include the following:

19-6-8	23-3-7	26-4-4	30-4-4
22-3-3	25-3-3	26-4-6	32-3-3
22-3-6	25-4-8	29-3-4	32-4-8
22-3-17	26-3-6	30-3-3	24-4-8

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.

23-3-7 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	23%
Water Insoluble Nitrogen.....	5%
Available Phosphate (P ₂ O ₅).....	3%
Soluble Potash (K ₂ O).....	7%

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

- (Number) pounds covers up to (Number) square feet.
- 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.
- 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® 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 (Kills) broadleaf lawn weeds.
- Controls (Kills) (Number) common lawn weeds including dandelion and clover.
- Feeds, greens and thickens lawns while controlling weeds.
- Poly-S® Technology.
- Scotts® slow-release polymer-encapsulated nitrogen fertilizer for uniform growth with extended feeding.
- 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 fertilizer 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 turf 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 pre-emergent. - Stage Two is a broadleaf postemergent. - Stage Three is an insecticide. - Stage Four is a fall broadleaf postemergent.

- Specially formulated with Scotts Poly S® timed-release fertilizer [as used by landscape professionals.]
- Weed control penetrates down to the root to kill dandelion, clover and other broadleaf weeds.
- Contains 40% of total guarantee of nitrogen as controlled release nitrogen for uniform growth and extended greening.
- (Number) pounds treats and feeds (Number) square feet of turfgrass.
- For best results, [always] use a Scotts® spreader.
- Visit our website www.xxxxx.com.
- Scotts No Quibble Guarantee™. If for any reason you are not satisfied with results after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.
- Answers to FAQ's on the internet at www.xxxxx.com
- Feeds up to 2 months.
- Contains Nutralene® Controlled Release Nitrogen.
- Produce superior results ... every time.
- Nutralene is a controlled release homogenous proven technology. It releases nitrogen gradually through hydrolysis and microbial action in the soil for a sustained feeding. Nutralene is unlike other nitrogen sources that depend on coatings, particle size, and temperature for their nitrogen release.
- The ultimate timed-released fertilizer as used by professional golf courses.
- Contains both readily available nitrogen for quick green up and controlled release nitrogen for uniform growth and extended feeding.
- Treats and feeds ____ sq.ft.
- Proudly produced in the U.S.A.
- Can we help you? Call toll-free: 1-XXX-XXX-XXXX or visit our website at www.XXXXXXX.com.

IV. Guarantees offered by supplemental registrants may include the following:

- **CAN'T FAIL GUARANTEE.** If you are not completely satisfied with the results after using this product, (Company Name) will refund your purchase price in full. Simply send proof of purchase and register receipt to (Company Name and Address).

V. Addition of a referral claim:

- To spot treat individual weeds, use Ortho Weed-B-Gon Weed Killer®.