

2217-661

12/20/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 20 2002

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

Dear Mr. Martens:

SUBJECT: Conversion from MCP P to MCP P-p
Gordon's Trimec Weed and Feed for Southern Lawns
EPA Registration No. 2217-661
Your Submission Dated September 5, 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.

A copy of the revised basic Confidential Statement of Formula, dated September 5, 2002 has been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSF's for this product.

7505C Martens 12/20/02							
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A stamped copy of the labeling is enclosed for your records. This labeling supersede all previously accepted labelings. 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

3/10

GORDON'S TRIMEC® WEED & FEED FOR SOUTHERN LAWNS 20-10-5

ACTIVE INGREDIENTS:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.32%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	0.18%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid	0.08%
INERT INGREDIENTS:	<u>99.42%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

5.40 lbs. or 0.27% (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton.

3.00 lbs. or 0.15% 2,4-dichlorophenoxyacetic acid equivalent per ton.

1.40 lbs. or 0.07% 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

See back panel for additional Precautionary Statements.

NET WEIGHT (15, 16, 18 or 20) POUNDS

580/ APxxxxxx

EPA Reg. No. 2217-661 Amend

EPA Est. No. 2217-KS-1

MANUFACTURED BY:



ACCEPTED
with COMMENTS
in EPA Letter Dated

DEC 20 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2217-661

A 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:

- ◆ Controls erosion
- ◆ Reduces glare
- ◆ Traps dust, smoke particles and other pollutants
- ◆ Reduces noise
- ◆ Improves soil condition
- ◆ Modifies temperature



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. • 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.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

ENVIRONMENTAL HAZARD:

This product is toxic to aquatic invertebrates. 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.

Note to Supplemental Registrants: Some fertilizer grades are hygroscopic, or certain formulations absorb water during storage that decrease the flowability during application. Phosphate and potash are relatively nonhygroscopic. However, fertilizer mixtures of urea and/or ammonium nitrate absorb water at lower humidities during the summer than during the winter. Caking may be prevented by maintaining low moisture contents in the fertilizers at all times. For these fertilizer formulations Options B or C may be used in place of Option A as the Storage statement in the following Storage and Disposal section.

STORAGE & DISPOSAL

OPTION A - For use with nonhygroscopic fertilizers:

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.

OPTION B - For use with hygroscopic fertilizers:

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. To prevent caking, this product should be stored in a cool, dry place.

OPTION C - For use with hygroscopic fertilizers:

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. Under conditions of high humidity, this product should be stored in a cool, dry place.

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. Do not overapply. Under conditions of adequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on 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.

Note to Supplemental Registrants: Application schedules will vary according to climatic conditions. The following application map and estimated application schedule may be presented on the container labeling of supplemental registrations.

WHEN TO APPLY:



Northern Zone	Transition Zone	Southern Zone
April through Mid-June	Mid-March through May	January through April

This application map estimates the schedule of fertilizer applications and should be used as a guideline only. Abnormal climatic conditions can affect your schedule.

Note to Supplemental Registrants: The following referrals to other pesticides or nonpesticides used sequentially may be presented on the container labeling of supplemental registrations.

SEQUENTIAL APPLICATIONS: Maintaining a healthy and lush green lawn involves several steps. The most important factor is an annual fertilizer application program.

ANNUAL FERTILIZER PROGRAM:

Step 1. Apply Late Winter - Early Spring.

(Brand Name) Crabgrass Preventer + Lawn Fertilizer... prevents crabgrass, *poa annua*, and other grass weeds while providing a deep green lawn with a controlled-release fertilizer.

Step 2. Apply Mid - Late Spring.

(Brand Name) Weed and Feed... kills over *(number)* weeds, roots and all, and provides a deep green lawn with a controlled-release fertilizer.

Step 3. Apply Late Spring - Summer.

(Brand Name) Lawn Fertilizer... provides extended greening throughout the summer months with controlled-release fertilizer.

Step 4. Apply Fall.

(Brand Name) Winterizer Lawn Food (or Fall/Winterizer Weed & Feed)... is specially formulated to prepare your lawn for winter and controls weeds in one easy step. Encourages earlier spring greening.

INSTRUCTIONS:

Gordon's Trimec® Weed & Feed For Southern Lawns 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, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 20-10-5 fertilizer provides a supply of 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. A second application may be made in approximately 30 days.

The maximum application rate to turf is 0.25 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering (see step 4).

3. Apply when weeds are young and actively growing, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to hold the material and prevent dust drift onto nontarget plants.
4. Do not wash from weed leaves for 1 to 2 days after application. At this time, a thorough watering should be made.

Note to Supplemental Registrants: Equipment settings may vary and may be presented on the container labeling of supplemental registrations. Illustrations or pictograms of spreader patterns may also be displayed.

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

The above spreader settings are approximate.

- 15 pound bag:* Calibrate your spreader on 330 square feet and adjust to apply at the rate of 1 pound of product per 330 square feet.
- 16 pound bag:* Calibrate your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- 18 pound bag:* Calibrate your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.
- 20 pound bag:* Calibrate your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.
- 20 pound bag:* Calibrate your spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet.

20-10-5 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	20%
Water Insoluble Nitrogen.....	5%
Available Phosphorus (P ₂ O ₅).....	10%
Soluble Potash (K ₂ O).....	5%

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/>."*

- BROADLEAF WEEDS -

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

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

10-6-4	20-10-5	25-4-6	28-2-5
15-5-7	22-3-3	26-3-3	28-3-3
15-5-10	22-3-6	26-3-5	30-3-3
16-7-7	25-3-3	27-3-3	

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. Guarantees offered by supplemental registrants may include the following:

- ◆ Money-Back Guarantee:
- ◆ (Brand Name) fertilizers are manufactured to the highest of quality standards. If you are not completely satisfied, (Company Name) will replace your product or refund your money. Call at (telephone number).

III. Note to supplemental registrants: Equipment settings may vary and may be presented on the container labeling of supplemental registrations. Illustrations or pictograms of spreader patterns may also be displayed.

- ◆ **SPREADER SETTINGS:** Rotary spreaders are easier to use and reduce streaking that's often caused by drop spreaders. While drop spreaders work well, they require more care to avoid gaps and streaks which appear as light green stripes about a week after fertilizer application.
- ◆ Always apply with a properly calibrated rotary or drop type fertilizer spreader. Never apply by hand.

ROTARY SPREADER SETTINGS	
Republic EZ Rotary	2
Scotts Easy Green	25
Quaker Rotary	3½
Ortho Rotary (6000)	2
Ev N Spread	13
True Temper	3½
Precision Rotary	5

DROP SPREADER SETTINGS	
Ortho Drop	5
Republic EZ Drop	5
Scotts Drop (PF3)	6¼
Scotts Even Green	6¼

IV. Advertising claims that supplemental registrants may present on the retail container labeling.

- ◆ (15, 16, 18, or 20) Pounds covers up to 5,000 square feet.
- ◆ Contains Trimec® herbicide.
- ◆ Controls over (number) broadleaf weeds, roots and all, including dandelion, chickweed, plantain, knotweed, henbit and spurge.
- ◆ Controls dandelion, chickweed, knotweed, plantain, henbit, spurge and many other broadleaf weeds in St. Augustinegrass, centipedegrass, bahiagrass, bermudagrass, zoysiagrass, bluegrass, perennial ryegrass, fescue spp. and bentgrass lawns.
- ◆ Can be used on bahiagrass, centipedegrass, bermudagrass, zoysiagrass, bluegrass, ryegrass, fescue and bentgrass lawns.
- ◆ Extended feeding formula.