UNITED STATES ENVIRONMENTAL PROTECTION AGENCY PM 23 2217-662 10-20-98

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Craig Martens
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 14090
Kansas City, MO 64101-0090

OCT 20 1998

Dear Mr. Martens:

Subject:

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Conversion from MCPP to MCPP-p Spreader King Lawn Weed Killer EPA Registration No. 2217-662

Your Submission Dated August 28, 1998

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement of Formula submitted in support of the conversion are acceptable with the following provisions:

- 1. This acceptance is based on your certification that no changes have been made to the Confidential Statement of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
- 2. You may sell or distribute product containing the racemic form of mecoprop, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (basic formulation dated August 28, 1998) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

DK: 30	5-7546:1	4B/PM23	}	ONCURRENCES		 	
STHEOL >	7505C						
SUPPRIME >	DIKENNY				 		
DATE	10/20/98						

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

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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And the second second

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SPREADER KING LAWN WEED KILLER

A TRIMEC® TURF HERBICIDE FORMULATION One Quart Covers Up To 8,000 Square Feet - KEEP FROM FREEZING -

Controls dandelion, chickweed, knotweed, henbit, plantain, clover, spurge and many other broadleaf lawn weeds.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	7.59%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)presionic acid	3.66%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenexy)propionic acid	1.83%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acci)	0.84%
INERT-INGREDIENTS:	87. <u>9</u> 1%
INERT INGREDIENTS:	89 74%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

0.543 0.54 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 6.30% 0.260 lb. 2 (2-methyl-1-chlorophenoxy propionic acid equivalent per gallon or 1.21% 0.13 lb. (+)-(R)-2-(7-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 1.51% 0.059 0.06 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.69% Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for Precautionary Statements.

NET CONTENTS ONE QUART

831/ APXXXXXX
EPA REG. NO. 2217-662
EPA EST. NO. 2217-KS-1
MANUFACTURED BY:

pbi/sondon
conponation

KANSAS CITY, MO 64101

ACCEPTED
with COMMENTS
In FPA Letter Dated

007 2 0 1998

Under the Federal Insecticide, Fundicide, and Rodemticide Act as amended for the pesticide registered under EPA Reg. No. 2217-662



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

the Common Constitution



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with eyes, skin or clothing. Wear face shield or goggles when mixing, loading or applying this product. When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

In case of contact, immediately flush eyes or skin with plenty of water. If irritation develops, get medical attention. Avoid contamination of food or feedstuffs.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply when weather conditions favor drift from target area.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and transferring this pesticide will reduce the probability of spills. Placement of the mixing loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

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 & DISPOSAL

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PRODUCT DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse container. Rinse thoroughly before discarding in trash.

USE PRECAUTIONS:

Do not allow spray to drift onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants since injury may result. Do not pour spray solutions near these plants. Do not use fine mist sprays. Coarse droplet sprays are less likely to drift away and thus damage nearby nontarget plants. Do not spray on lawns or turf where desirable clovers are present. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within dripline of trees and other ornamental species. Do not use Spreader King Lawn Weed Killer on carpetgrass, dichondra, St. Augustinegrass, bentgrass, centipedegrass, or hybrid bermudagrass.

WHERE TO USE:

Spreader King Lawn Weed Killer may be used on bluegrass, fescue, ryegrass, or zoysiagrass lawns, vacant lots, playgrounds and other similar areas where broadleaf weeds are present.

The maximum application rate to turf is 0.8 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 USE:

- 1. Spray at any time during the growing season when weeds are actively growing.
- 2. On new lawns, wait until the grass has reached a height of 2 inches before making am overall sprey treatment. Wait 3 weeks before seeding or planting stolons, plugs or sprigs.
- 3. Poor weed control may result if spray is applied during drought or just before rain.
- 4. For best results, mow before treating.
- 5. Do not water lawn within 24 hours after treatment.

HOW TO USE (ENTIRE LAWN) IN THE SPREADER KING LAWN SPREADER.

- 1. Determine lawn size by multiplying length x width = square feet.
- 2. Select the proper lawn size in column 1 below.
- Select the proper amount of Spreader King Lawn Weed Killer from column 2 and pour into the Spreader King bottle.
- 4. Fill bottle with water to amount shown in column 3.
- 5. Push Spreader King at average walking speed being careful not to overlap treated areas

Column 1	Colu	Column 3 Fill Bottle to	
Law n Size	Amount Spreader King Lawn Weed Killer		
(Square Feet)		(Fluid Ounces)	(Pints)
1, 0 00	8	4	1
2,050	16	28	2
3, 0 00	24	12	3
4,0 00	36	16	4
5,000	40	20	5
6,000	48	24	6
7,000	56	28	7
8,000	64	32	8

HOW TO USE (ENTIRE LAWN) IN A HOSE END SPRAYER:

Use a hose end sorayer designed for lawns. Put recommended amount of product (Column 1 in boths and add water to indicated level (Column 2), and spray on area shown in Column 3. For example, to spray 2,500 square feet, measure 10 fluid ounces (20 Tbs.) in bottle, add water to the 10 pallon level, and mix. Turn on hose and spray as evenly as possible over 2,500 square feet.

C	olumn 1	Column 2	Column 3 Area to Treat	
Amount of Law	n Weed Killer to Use	Fill Bottle to:		
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Fee)	
10	5	5	1,250	
20	10	10	2,500	
30	15	15	3,750	
40	20	20	5,000	

HOW TO USE (LARGE AREAS) IN A PRESSURE SPRAYER:

Measure indicated amount into tank and dilute with water according to the following chart. Use a spray pattern that gives small spray droplets without any fine mist, and cover the area indicated.

Colt	ımn 1	Column 2	Column 3 Area to Treat	
Amount of Lawn	Weed Killer to Use	Fill Bottle to:		
	(Fluid Ounces)	(Gallons)	(Square Feet)	
2	1	1	250	
4	2	2	500	
6	3	3	750	

HOW TO USE (SPOT SPRAYING) IN A PRESSURE SPRAYER:

To spray small areas or individual weeds, do not use a hose end sprayer. Mix 1 fluid ounce (2 Tbs.) in ½ gallon of water in a pressure sprayer, and spray as required being certain to wet each weed.

CONTROLS:

	- Sensitive Weed	is and the second sec		
Bedstraw	Dandelion	Purslane		
Black medic	Knotweed	Ragweed		
Buckhorn	Lambsquarters	Shepherdspurse		
Chickweed	Peppergrass	Wild lettuce		
Clover	Plantain			
	- Hard-To-Kill Wee	eds -		
Chicory	Morningglory	Speedwell		
Dock	Oxalis	Spurge		
Ground ivy	Pigweed	Wild carrot		
Healall	Poison ivy	Wild onion		
Lespedeza	Poison oak	Yarrow and many		
Mallow	Sheep sorrel	other broadlesf 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 by end 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.