

2217-681

7-17-2002

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JUL 17 2002

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

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
 Trimec Liquid Weed and Feed
 EPA Registration No. 2217-681
 Your Submissions Dated April 17 and July 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 dimethylamine mecoprop from its racemic form [dimethylamine salt of 2-(2-methyl-4-chlorophenoxy) propionic acid] to its single isomer form [dimethylamine salt of (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid]. 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 dimethylamine mecoprop 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 April 3, 2002) have been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

DK: 305-7546: HB/PM23

CONCURRENCES

SYMBOL	7505C							
SURNAME	D. KENNY							
DATE	7/17/2002							

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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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TRIMEC[®] LIQUID WEED & FEED 15-0-0

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	5.67%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	1.37%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	0.63%

INERT 92.33%

INGREDIENTS:.....
TOTAL 100.00%

THIS PRODUCT CONTAINS:

- 0.44 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 4.71%
- 0.11 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 1.13%
- 0.05 lb. Dicamba (3,6-dichloro-o-anisic acid equivalent per gallon or 0.52%

Isomer Specific by AOAC Methods.

Contains the single isomer form of Mecoprop-p.

TRIMEC[®] is a registered trademark of PBI/Gordon Corporation.

GUARANTEED ANALYSIS	
Total Nitrogen (N), Not less than.....	15%
15% Urea Nitrogen - Derived from Urea	

KEEP OUT OF REACH OF CHILDREN

CAUTION

First Aid

- ~~IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.~~
- ~~IF ON SKIN: Wash with plenty of soap and water. Get medical attention.~~
- ~~IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.~~

See back panel for additional Precautionary Statements.

NET CONTENTS: One Quart (Net Weight: 2 lbs. 5 oz.)
or Two Quarts (Net Weight: 4 lbs. 10 oz.)

803/ APxxxxxx
 EPA REG. NO. 2217-681 Amend
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



ACCEPTED
 with COMMENTS
 in EPA Letter Dated

JUL 17 2002

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-681

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

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.

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.
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.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • 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.</p> <p>You may also call toll-free, 1-877-800-5556 for emergency medical information.</p>	

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. Do not apply when weather conditions favor drift from target area. Do not contaminate domestic or irrigation waters.

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: Keep from freezing. Store in original container in a locked storage area inaccessible to children. Do not store near food or feedstuffs. Avoid contamination of food or feedstuffs.

~~**PESTICIDE 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.~~

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DISPOSAL:

If Empty—Do not reuse this container. Place in trash or offer for recycling if available.

If Partly Filled—Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

USE PRECAUTIONS:

Do not allow spray to drift to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants since injury may result. Do not spray when grass is emerging from dormancy. Do not apply to newly seeded lawn grasses until well established. Do not spray when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application. Do not use on carpetgrass, dichondra, St. Augustinegrass, centipedegrass, closely-mowed bentgrass, nor 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.

OPTION (A) OR (B) TO BE USED DEPENDING ON THE SUBREGISTRATION.

OPTION (A)

A lawn will typically utilize 1 to 4 pounds of nitrogen per 1,000 square feet each growing season. When applied as directed this product supplies 0.069 pounds of nitrogen per 1,000 square feet with each application. Use this product in conjunction with an additional fertilization program to provide at least 1 pound of nitrogen per 1,000 square feet each growing season. Consult your local Agricultural Extension agent for the proper amount of nitrogen to be applied in your area.

OPTION (B)

Trimec® Liquid Weed & Feed should be supplemented by Liquid Lawn Fertilizer every 3 weeks from March through September (or April through October depending upon the growing season in your area). Please consult your local extension office for questions concerning a regular fertilizer program.

WHERE TO USE:

Trimec® Liquid Weed & Feed may be used on bahiagrass, bermudagrass, bluegrass, fescue, perennial ryegrass or zoysiagrass lawns, vacant lots, playgrounds and other similar areas where broadleaf weeds are present. This product is especially effective on all hard-to-kill weeds such as poison ivy, poison oak, sheep sorrel and spurge. In addition Trimec® Liquid Weed & Feed controls most other broadleaf weeds, including sensitive weeds such as chickweed, clover, dandelion, knotweed and plantain.

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 an overall spray treatment. Wait 3 weeks after application before seeding or planting stolons.
3. Poor weed control may result if spray is applied during drought or just before rain.
4. For best results, mow 1 to 2 days before treating.
5. Do not water lawn within 24 hours after treatment.

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.

HOW TO USE: Shake well before using.

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OPTIONS (C) THRU (K) - ONE TO BE USED DEPENDING ON LABEL.

OPTION (C)

Connect spray nozzle to garden hose; remove safety cap from container; attach tube to applicator and insert tube section. Attach container to end of nozzle. Turn on water; place finger over hole on right side of nozzle and proper ratio of Trimec® Liquid Weed & Feed will automatically be dispersed. Spray directly over area requiring application evenly and uniformly.

OPTION (D)

This half-gallon package is intended as a refill for the quart hose end sprayer applicator/container of Trimec® Liquid Weed & Feed. However, this product may be used in any hose end sprayer in which herbicides have been used.

Add Trimec® Liquid Weed & Feed to the hose end sprayer jar. **DO NOT ADD WATER TO THE JAR.** Shake jar well. One-half gallon will fill your quart hose end sprayer twice. One quart covers 5,000 square feet. One-half gallon will cover up to 10,000 square feet.

OPTION (E)

1. Attach spray nozzle to garden hose. Turn nozzle clockwise to firmly attach it to hose.
2. Remove cap from bottle (directions on cap) and screw bottle into spray nozzle.
3. Turn the on/off switch on top of the spray nozzle counter clockwise to the "OFF" position. Then turn on the water at the faucet.
4. To begin spraying, turn the sprayer nozzle switch clockwise to the "ON" position. The water automatically mixes with the product. Walk at a steady pace spraying in a side to side arc, slightly overlapping treated areas. Refer to graduated scale on side of container to guide coverage.
5. To stop spraying, turn the sprayer nozzle switch counter clockwise to the "OFF" position and turn off water at the faucet.

OPTION (F)

1. Attach garden hose to connector on dispenser
2. Insert screwdriver into slot in orange lock ring and twist, snapping lock ring in two.
3. Remove both parts of separated lock ring.
4. Turn arrow on activator switch to OFF position.
5. Push activator switch securely down against top of sprayer. This will pierce the safety seal inside the dispenser.
6. To begin spraying, turn on water and then move activator switch to the ON position.
7. To stop dispensing the product, turn off water.

OPTION (G)

1. Connect spray nozzle to garden hose. Be sure that valve is in "OFF" position.
2. Remove bottle cap and screw bottle onto nozzle. Turn on water.
3. Turn valve to "ON" position to start flow of water. Use valve to shut off flow of water at any time.

OPTIONS (H) OR (I) - ONE TO BE USED DEPENDING ON PACKAGING USED.

OPTION (H)

Check handy measuring guide to determine remaining area to be covered.

OPTION (I)

Check handy measuring guide to see how much of this liquid has been used.

OPTIONS (J) OR (K) - ONE TO BE USED DEPENDING ON PACKAGING.

OPTION (J) to be used on label for one-half gallon (2 quart) container.

- HOW TO USE:**
1. SHAKE WELL BEFORE USING.
 2. Unscrew the cap from this container and carefully remove the foil seal.
 3. Fill the hose end sprayer jar with the amount of product specified in the chart below. DO NOT dilute this product with water when filling the sprayer jar.
 4. Attach the sprayer to garden hose.
 5. Turn water on at full volume.
 6. Hold the sprayer at waist level with the nozzle pointed away from the face and body.
 7. Walk back and forth over lawn while spraying (as you would when mowing) covering the lawn thoroughly. Overlap slightly for uniform coverage.

OPTION (K) to be used on label for 1 quart container.

1. **HOW TO USE:**
2. SHAKE WELL BEFORE USING.
3. Connect spray nozzle to garden hose.
4. Remove white cap from bottle and screw bottle into the spray nozzle.
5. Turn the black "on-off" lever to the "off" position by turning to the right. Turn water on full volume.
6. Hold the sprayer at waist level with the nozzle pointed away from the face and body.

- 7. To spray, turn the black "on-off" lever to the center "on" position.
- 8. Walk back and forth over lawn while spraying (as you would when mowing) covering the lawn thoroughly. Overlap slightly for uniform coverage.

WEEDS CONTROLLED		
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	Plantain	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.

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APPENDIX

I. Advertising claims that may be used by supplemental registrants: These claims may be presented on the retail container label or on the labeling accompanying the product.

- ◆ Keep From Freezing
- ◆ 1 Quart Covers Up To 5,000 Square Feet or (2 Quarts Covers Up To 10,000 Square Feet.)
- ◆ Controls dandelion, chickweed, knotweed, henbit, plantain, clover, spurge and many other broadleaf lawn weeds.
- ◆ The fast, easy way to weed control and fertilize your lawn.
- ◆ No Spreading - No Complicated Mixing

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