

Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
1217 West 17th Street
Kansas City, MO 64104

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Trimec Weed and Feed For Sensitive Grasses
EPA Registration Number: 2217-716
Your Submission Dated April 17, 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 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.

Copies of the revised basic Confidential Statement of Formula dated August 17, 2001 has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

M. Cooke
7-29-02

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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

TRIMEC® LIQUID WEED & FEED FOR SENSITIVE GRASSES 15-0-0 (or 20-0-0)

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- KEEP FROM FREEZING -

1 Qt. Covers 3,500 To 5,000 Sq.Ft. (or) 2 Qts. Covers 7,000 To 10,000 Sq.Ft.

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

Contains MCPP-p, 2,4-D, Dicamba and a 15-0-0 (or 20-0-0) Fertilizer

ACTIVE INGREDIENTS:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	1.93%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	1.11%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	0.47%

INERT INGREDIENTS.....	96.49%
TOTAL	100.00%

This Product Contains

0.146 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 1.59%

0.084 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 0.92%

0.035 lb. Dicamba (3,6-dichloro-o-anisic acid) equivalent per gallon or 0.39%

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 CONTENTS ONE QUART (NET WEIGHT: 2 LBS. 5 OZ.)
or 2 QUARTS (NET WEIGHT: 4 LBS. 10 OZ.)**

813/ APxxxxxx
EPA REG. NO. 2217-716 Amend
EPA EST. NO. 2217-KS-1
MANUFACTURED BY:



**ACCEPTED
with COMMENTS
In EPA Letter Dated**

JUL 29 2002

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

2217-716



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

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

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.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment.</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.

CONTAINER DISPOSAL:

If Empty: Do not reuse 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 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. Seed can be sown 3 to 4 weeks after application. Do not use on carpetgrass, dichondra, or on lawns or turf where desirable clovers are present. Do not spray roots of trees and ornamentals. Do not exceed specified dosages. Be particularly careful within dripline of trees.

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15-0-0 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	15%
15% Urea Nitrogen Derived From Urea	

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/>."*

OPTION A OR B TO BE USED DEPENDING ON THE SUBREGISTRATION

OPTION (A) FOR 15-0-0:

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 0.07 - 0.10 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 (A) FOR 20-0-0:

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 0.09 - 0.13 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) FOR BOTH 15-0-0 or 20-0-0:

Trimec® Liquid Weed & Feed for Sensitive Grasses 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.

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WHERE TO USE:

Trimec[®] Liquid Weed & Feed for Sensitive Grasses is especially formulated for use on sensitive southern grasses - St. Augustinegrass, bentgrass, bahiagrass, bermudagrass, and centipedegrass - as well as on Kentucky bluegrass, fescue *spp.*, perennial ryegrass or zoysiagrass lawns. Trimec[®] Liquid Weed & Feed for Sensitive Grasses is especially effective on all hard-to-kill weeds such as poison ivy, poison oak, sheep sorrel and spurge. Trimec[®] Liquid Weed & Feed for Sensitive Grasses also controls the easy-to-kill weeds such as chickweed, clover, dandelion, knotweed and plantain. Finally, Trimec[®] Liquid Weed & Feed for Sensitive Grasses also feeds your lawn with a 15% (or 20%) urea nitrogen

For best results, spraying should be done when weeds are young and tender. Older weeds are more difficult to kill and may require a retreatment in 30 days to achieve complete control.

For St. Augustinegrass, Bentgrass, Bahiagrass, Bermudagrass, and Centipedegrass: Apply Trimec[®] Liquid Weed & Feed for Sensitive Grasses at 1 quart (32 fluid ounces) per 5,000 square feet of turfgrass.

This product may be injurious to St. Augustinegrass, bentgrass, and centipedegrass under conditions of high temperature and moisture. Under these conditions, or in cases of accidental overdose, some slight temporary discoloration of the St. Augustinegrass may occur. Do not use this product on 'Floritam' St. Augustinegrass in Florida.

For Kentucky Bluegrass, Fescue *spp.*, Perennial Ryegrass, and Zoysiagrass: Apply Trimec[®] Liquid Weed and Feed at 1 quart (32 fluid ounces) per 3,500 square feet of turfgrass.

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 0.3 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 TO USE: SHAKE WELL BEFORE USING.

OPTION (1)

ASSEMBLY INSTRUCTIONS

1. Attach siphonage tube to hose end sprayer attachment.
2. Remove cap from bottle and insert sprayer attachment.
3. Securely tighten sprayer attachment on bottle.
4. Screw hose into hose-end sprayer attachment.

SPRAYING INSTRUCTIONS

1. Turn on water. **TO START FLOW OF PRODUCT:** Place finger over the hole on top right side of sprayer attachment. Hold about 3 feet above area to be treated moving at a steady pace to ensure consistent coverage.
2. **TO STOP FLOW OF PRODUCT:** Remove finger from hose to break siphon action.

Note: To ensure adequate coverage, use moderate to high water pressure when applying through hose end sprayer attachment.

OPTION (2)

Connect spray nozzle to garden hose; remove safety cap from container; 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 for Sensitive Grasses will automatically be dispersed. Spray directly over area requiring application evenly and uniformly. (Check handy measuring guide to see how much of this liquid has been used.)

OPTION (3) - To be used on label for one-half gallon container size.

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 covering the lawn thoroughly. Overlap slightly for uniform coverage.

OPTION (4) - To be used on label for 1 quart container.

HOW TO USE:

1. SHAKE WELL BEFORE USING.
2. Connect spray nozzle to garden hose.
3. Remove white cap from bottle and screw bottle into the spray nozzle.
4. Turn the black "on-off" lever to the "off" position by turning to the right. Turn water on full volume.
5. Hold the sprayer at waist level with the nozzle pointed away from the face and body.
6. To spray, turn the black "on-off" lever to the center "on" position.
7. Walk back and forth over lawn while spraying covering the lawn thoroughly. Overlap slightly for uniform coverage.

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- WEEDS -		
Bedstraw	Healall	Ragweed
Black medic	Henbit	Sheep sorrel
Buckhorn	Knotweed	Shepherdspurse
Bull thistle	Lambsquarters	Speedwell
Burdock	Lespedeza	Tansy mustard
Buttercup	Mallow	Thistle
Chicory	Morningglory	Spurge
Chickweed	Mustard	Velvetleaf
Clover	Oxalis	Wild carrot
Cocklebur	Peppergrass	Wild garlic
Dandelion	Pigweed	Wild lettuce
Dock	Plantain	Wild onion
Galinsoga	Poison ivy	Yarrow
Ground ivy	Poison oak	and many other
Hawkweed	Purslane	broadleaf lawn 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 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.

MEASURING GUIDE (DEPENDENT UPON CONTAINER SIZE)	
For 1 quart container	For 2 quart container
1,000 SQ.FT. ----- COVERAGE	1,000 SQ.FT. ----- COVERAGE
3,000 SQ.FT. ----- COVERAGE	3,000 SQ.FT. ----- COVERAGE
5,000 SQ.FT ----- COVERAGE WHEN EMPTY	5,000 SQ.FT ----- COVERAGE
	7,000 SQ.FT. ----- COVERAGE
	10,000 SQ.FT. ----- COVERAGE WHEN EMPTY

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APPENDIX

I. Approved Fertilizer Grades with nutrient contents expressed as the percentages of N, P₂O₅, and K₂O include the following: 15-0-0 or 20-0-0

20-0-0 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	20%
20% Urea Nitrogen Derived From Urea	

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. Advertising claims that may be used on the container labeling of supplemental registrations.

- ◆ 1 quart covers 3,500 to 5,000 square feet (or 2 quarts covers 7,000 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 fertilizer your lawn.
- ◆ No spreading - No complicated mixing.
- ◆ Contains MCPP, 2,4-D, Dicamba, and a 15-0-0 (20-0-0) fertilizer.
- ◆ Contains Trimec® Herbicide, the #1 broadleaf herbicide used by golf courses.
- ◆ Feeds your lawn and kills weeds in one easy application.
- ◆ Ready-to-spray
- ◆ Weed roots are killed.