

PM 23

2217-725 10/5/98
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OCT 5 1998

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

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Trimec® Southern Liquid Weed & Feed 25-0-0
EPA Registration Number: 2217-725
Your Submission Dated September 3, 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(s) of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to the Confidential Statement(s) of Formula (CSF) or the product labeling other than those specified within the body of your certification statement or cover letter dated September 3, 1998. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of 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 09/03/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #8:S549659.CNV

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Oct 5, 1998							

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

3 4 7

TRIMEC® SOUTHERN LIQUID WEED & FEED 25-0-0

For Sensitive Grasses

- KEEP FROM FREEZING -

One Quart Covers Up To 5,000 Square Feet.

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

The fast, easy way to weed control and supplement your lawn.

No Spreading - No Complicated Mixing - Just attach to a garden hose & spray

ACTIVE INGREDIENTS:

Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid	3.85%
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:	94.57%
INERT INGREDIENTS:	96.49%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.33 lb 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 3.18%
- 0.16 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.59%
- 0.10 0.09 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 0.92%
- 0.04 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 0.39%

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

Statement of Practical Treatment

In case of contact, wash skin with plenty of soap and water.
For eyes, flush with water for 15 minutes and get medical attention.

See back panel for additional Precautionary Statements.

ACCEPTED
with COMMENTS
In EPA Letter Dated
OCT 5 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-725

NET CONTENTS ONE QUART (NET WEIGHT: 2 LBS 6 OZ)

702/ APXXXXXX
EPA REG. NO. 2217-725
EPA EST. NO. 2217-KS-1
MANUFACTURED BY:



4 7 7



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & 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, 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. 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.

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children. Do not store near 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.

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. 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.

25-0-0 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	25%
25% Urea Nitrogen Derived From Urea.	

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OPTION 1 OR 2 TO BE USED DEPENDING ON THE SUBREGISTRATION

OPTION (1)

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 0.128 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 (2)

Trimec® Southern 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 concerning a regular fertilizer program.

WHERE TO USE:

Trimec® Southern Liquid Weed & Feed is especially formulated for sensitive southern grasses - St. Augustinegrass, bentgrass, bahiagrass, bermudagrass, and centipedegrass in lawns, vacant lots, playgrounds and other similar areas where broadleaf weeds are present. Trimec® Southern Liquid Weed & Feed is especially effective on all hard-to-kill weeds such as poison ivy, poison oak, sheep sorrel and spurge. Trimec® Southern Liquid Weed & Feed also controls the easy-to-kill weeds such as chickweed, clover, dandelion, knotweed and plantains. In addition, Trimec® Southern Liquid Weed & Feed also feeds your lawn with a 25% urea nitrogen. For best results, spraying should be done when weeds are young and tender. Older weeds are harder to kill.

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 0.25 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.

HOW TO USE: Shake Well Before Using.

(One of the Following Will Be Used Depending On The Hose-End Applicator Used.)

OPTION (A)

INSTRUCTIONS

1. Connect spray nozzle to garden hose.
2. Shake contents of bottle well.
3. Remove safety cap.
4. Attach tube to nozzle applicator.
5. Attach bottle to open end of spray nozzle. Turn bottle counter clockwise until threads mesh. Then turn the bottle clockwise until tightly closed.
6. Turn on water; place finger over hole on right side of nozzle and proper ratio 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 (B)

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 will automatically be dispersed. Spray directly over area requiring application evenly and uniformly. (Check handy measuring guide to see how much liquid has been used.)

OPTION (C)

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, which 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 (D)

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 the 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 (E)

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

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

- WEEDS -		
Bedstraw	Healall	Ragweed
Black medic	Henbit	Sheep sorrel
Buckhorn	Knotweed	Shepherdspurge
Bull thistle	Lambsquarters	Speedwell
Burdock	Lespedeza	Spurge
Buttercup	Mallow	Tansy mustard
Chicory	Morningglory	Thistle
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.

