

2217-726

8/27/2001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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AUG 27 2001

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

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
Trimec 901 Weed & Feed 20-0-0
EPA Registration No. 2217-726
Your Submission Dated May 23, 2001

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(s) 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 and bearing that previously approved labeling for 18 months from the date of this letter.

A stamped copy of the labeling is enclosed for your records. This labeling supersedes all previously accepted labels. 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

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	JM/Jan							
DATE	8/27/01							

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TRIMEC® 901

LIQUID WEED & FEED 20-0-0

- KEEP FROM FREEZING -

One-Half Gallon Covers Up To 5,000 Square Feet.

Controls Dandelion, Chickweed, Knotweed, Henbit, Plantain, Clover, Spurge and many other broadleaf lawn weeds; some of which are shown on this label.

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

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	2.784%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid...	0.668%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid.....	0.303%
INERT INGREDIENTS:.....	96.245%
TOTAL	100.000%

THIS PRODUCT CONTAINS:

- 0.22 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 2.313%
- 0.05 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 0.052%
- 0.02 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.252%
- Isomer Specific by AOAC Methods.
- Contains single isomer form of Mecoprop-p.
- TRIMEC® is a registered trademark of PBL Gordon Corporation.

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.

NET CONTENTS: ONE HALF GALLON (NET WEIGHT: 4 LBS 12 OZ)

703/ AP
 EPA REG. NO. 2217-726 Amend
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



ACCEPTED
 with COMMENTS
 In EPA Letter Dated

AUG 27 2001

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.,
2217-726

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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. 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. To prevent cross-contamination, do not store near other fertilizers, insecticides, fungicides, or seeds.

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.

OTHER 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 the temperature exceeds 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 tree and other ornamental species.

20-0-0 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	20%
20% 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/ag/>."*

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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 0.19 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® 901 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® 901 Liquid Weed & Feed may be used on bahiagrass, bermudagrass, bluegrass, fescue, 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® 901 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.

(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)

1. Attach spray nozzle to garden hose by turning nozzle clockwise and securing firmly to the hose.
2. Remove cap from bottle and screw bottle into spray nozzle.
3. Flip the on/off switch on top of the spray nozzle backward or toward the garden hose to the "OFF" position. Then turn on the water at the faucet.
4. To begin spraying, flip the sprayer nozzle switch forward 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, flip the sprayer nozzle switch backward to the "OFF" position and turn off water at the faucet.

OPTION (F)

This gallon package is intended as a refill for the one-half gallon hose end sprayer applicator/container of Trimec® 901 Liquid Weed & Feed. However, this product may be used in any hose end sprayer in which herbicides have been used.

Add Trimec® 901 Liquid Weed & Feed to the hose end sprayer jar. DO NOT ADD WATER TO THE JAR. One-half gallon covers 5,000 square feet. One gallon covers up to 10,000 square feet.

OPTION (G)

PRESSURE-SPRAYERS: Measure one-half gallon of Trimec® 901 Liquid Weed & Feed into tank and dilute with 4½ to 19½ gallons of water. Use a spray pattern that gives small droplets without any fine mist and cover 5,000 square feet. For hand sprayers add 13 fluid ounces to 1 gallon of water and spray over 1,000 square feet.

- WEEDS -		
Bedstraw	Healall	Ragweed
Black medic	Herbit	Sheep sorrel
Buckhorn	Knotweed	Shepherdspurse
Bull thistle	Lambsquarters	Speedwell
Burdock	Lespedeza	Spurge
Buttercup	Mallow	Tansy mustard
Chicory	Momingglory	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.