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SFP - 6 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

MM 885

EPA Registration No. 2217-729

Your Submission Dated June 6, 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:

- This acceptance is based on your certification that no changes have been made to the basic 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 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								
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MM 885

For the Control of Broadleaf Weeds in Kentucky Bluegrass, Fescues, Bermudagrass and Bentgrass Turf.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

ACTIVE INGREDIENTS:

*Dimethylamine Salt of 2-methyl-4-chlorophenoxyacetic acid	38.28%
**Dimethylamine Salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	12.60%
INERT INGREDIENTS:	<u>49.12%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

*2.92 lbs. 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 31.25%.

**0.97 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 10.42% Contains the single isomer form of Mecoprop-p.

KEEP OUT OF REACH OF CHILDREN

DANGER

Statement of Practical Treatment

IF IN EYES: In case of eye contact, immediately flush eyes with plenty of water for 15 minutes. Call a physician at once.

IF ON SKIN: Wash promptly with soap and water. Rinse thoroughly and get medical attention. IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, or, if these are not available, drink large quantities of water. Avoid alcohol.

IF INHALED: Remove victim to fresh air and apply respiration if indicated.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

See additional Precautionary Statements elsewhere on this label.

- KEEP FROM FREEZING -

NET CONTENTS: ___ GALLONS

711/ EPA REG. NO. 2217-729 Amend EPA EST. NO. 2217-KS-X MANUFACTURED BY:



1 Employee-Owned Company 1217 West 12th Street Kansas City, Missouri 64101 ACCEPTED
with COMMENTS
In EPA Letter Dated
SEP - 6 2001

Under the Federal Insecticide, Fundicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2217-729



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing vapor or spray mist. Wear face shield, goggles or safety glasses when mixing, loading or applying this product. It is recommended that safety glasses include front, brow and temple protection. Wear long pants, long-sleeved shirt, shoes and gloves when mixing, loading or applying this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS:

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. 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 away from target area. Do not contaminate domestic or irrigation waters.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPP and MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPP and MCPA 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 reenter or permit workers to reenter treated area until sprays have dried or dusts have settled.

STORAGE & DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a locked storage area. Keep from freezing. To avoid cross-contamination, do not store near other pesticides, fertilizers, or seeds.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your state Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

USE PRECAUTIONS:

- Do not apply this product through any type of irrigation system.
- Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near nontarget plants. Do not use on warm season grasses such as St. Augustinegrass, centipedegrass, dichondra, or on lawns and turf where desirable clovers are present.
- NOTE: Coarse sprays are less likely to wind drift. Do not spray when air temperature exceeds 85°F.
- Seed can be sown 3 to 4 weeks after application.
- · Do not contaminate domestic or irrigation waters.
- After using this product, clean sprayer thoroughly with soap or detergent and water and rinse thoroughly before applying other pesticides. Failure to observe the above precautions may result in injury.

GENERAL INFORMATION AND INSTRUCTIONS:

This product is for the control of broadleaf weeds in Kentucky bluegrass, fescues, bermudagrass, and bentgrass turf. Do not use this product on closely-mowed bentgrass or bermudagrass as on golf greens or tees. Weeds are best controlled when they are young and actively growing.

MM885 is intended to be applied by lawn care operators and landscape personnel for use in ornamental lawns and turf established in ornamental sites. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial and institutional buildings.

WEEDS CONTROLLED:

Susceptible - Dandelion, clover, common chickweed, mouseear chickweed, plantain, pigweed, ragweed and lambsquarters.

Moderately Susceptible - Knotweed, black medic, English daisy, dock, purslane, oxalis, mallow.

APPLICATION RATE:

For established turf, apply 1 to 1¼ fluid ounces of product per 1,000 square feet (2 2/3 to 3 1/3 pints of product per acre) in 0.5 to 2 gallons of water per 1,000 square feet (20 to 80 gallons per acre). Use higher rates when hard-to-kill weeds are present. Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid applying during periods when turf is under stress from drought or extreme heat. Do not water for 24 hours after application. Do not apply to newly seeded turf until after the second or third mowing.

NOTE: Use application equipment that is capable of applying uniform droplets over the entire area to be covered.

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 reasonable 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.