

Craig Martens
 PBI/Gordon Corporation
 1217 West 12th St.
 P.O. Box 014090
 Kansas City, Missouri 64101-0090

FEB 12 2002

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
 MM 890 Liquid Weed and Feed
 EPA Registration No. 2217-735
 Your Submission Dated November 9, 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, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised Confidential Statement of Formula (Basic and Alternate Formulations, dated November 8, 2001) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSF's for this product.

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)

CONCURRENCES

SYMBOL ▶	7505C						
SURNAME ▶	Miller						
DATE	2/12/02						

2/6

MM 890 LIQUID WEED & FEED 20-0-0 (or 15-0-0)

KEEP FROM FREEZING

1 Quart 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-methyl-4-chlorophenoxyacetic acid	6.98%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	2.30%

INERT INGREDIENTS:.....	90.72%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

0.53 lb. 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 5.70%.

0.17 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.90%.

Contains the single isomer form of Mecoprop-p.

KEEP OUT OF REACH OF CHILDREN

DANGER

See back panel for additional Precautionary Statements and Statement of Practical Treatment.

NET CONTENTS: ONE QUART (NET WEIGHT 2 LBS. 7 FL. OZ.)

AP

EPA REG NO 2217-735 Amend

EPA EST NO 2217-KS-1

MANUFACTURED BY:



ACCEPTED
with COMMENTS
In EPA Letter Dated

FEB 12 2002

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

2217-735

EPA Reg. No. 2217-735



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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles, long pants, long-sleeved shirt and shoes when applying this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Statement of Practical Treatment

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF SWALLOWED: Call a physician or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available drink large quantities of water. Avoid alcohol.

IF INHALED: Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth-to-mouth. Get medical attention.

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

ENVIRONMENTAL HAZARDS:

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater or rinsate. 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 reenter or permit others to reenter treated area until sprays have dried or dusts have settled.

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

STORAGE & DISPOSAL

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.

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 where 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 trees and ornamental species.

- WEEDS -		
Bedstraw	Healall	Ragweed

Black medic	Henbit	Sheep sorrel
Buckhorn	Knotweed	Shepherdspurse
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.

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

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 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)

MM890 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:

MM890 Liquid Weed & Feed may be used on bahiagrass, bermudagrass, bluegrass, fescue, rye 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, this product controls most other broadleaf weeds, including sensitive weeds such as chickweed, clover, dandelion, knotweed and plantain.

WHEN TO USE:

1. Spray 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 for seeding and sprigging.
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.

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 MM890 Liquid Weed & Feed. However, this product may be used in any hose end sprayer in which herbicides have been used.

Add MM890 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.

OPTION (F)

ASSEMBLY INSTRUCTIONS (Step by step diagrams illustrated.)

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 (Illustrated diagrams.)

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.

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.