

NOV 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<sup>(R)</sup> M907 Liquid Weed & Feed for Sensitive Grasses  
 EPA Registration Number: 2217-736  
 Your Submission Dated September 8, 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 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 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 9/8/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

CONCURRENCES

SYMBOL ▶	7505c						
SURNAME ▶	DMorgan						
DATE ▶	Nov 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

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# TRIMEC® M907 LIQUID WEED & FEED FOR SENSITIVE GRASSES 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.

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

No spreading - No complicated mixing - Just attach to a garden hose and spray.

### ACTIVE INGREDIENTS:

Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid .....	1.863%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.932%
Dimethylamine salt of 2-methyl-4-chlorophenoxyacetic acid .....	1.029%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid .....	0.205%

<b>INERT INGREDIENTS:</b> .....	<b>96.903%</b>
<b>INERT INGREDIENTS:</b> .....	<b>97.834%</b>
<b>TOTAL</b>	<b>100.000%</b>

### THIS PRODUCT CONTAINS:

- 0.1465 lb 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.54%.
- 0.0727 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 0.77%
- 0.0815 0.0793 lb 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 0.84%.
- 0.0163 0.0160 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 0.17%.

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

**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

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

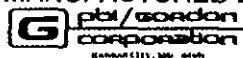
**IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.

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

See back panel for additional Precautionary Statements.

**NET CONTENTS: One-Half Gallon (Net Weight 4 Lbs. 12 Oz.)  
or One Gallon (Net Weight )**

706/ APXXXXXX  
EPA REG NO 2217-736  
EPA EST NO 2217-KS-1  
MANUFACTURED BY:



ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
NOV - 5 1998

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

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Causes moderate eye injury. Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Wear long pants, long-sleeved shirts and shoes when applying this product. Wear goggles when applying this product. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS:**

Drift or runoff may adversely effect 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. Avoid contamination of 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 discoloration of the St. Augustinegrass may occur.

Weeds Controlled:		
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 and other
Ground ivy	Poison oak	broadleaf lawn weeds.
Hawkweed	Purslane	

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20-0-0 GUARANTEED ANALYSIS	
Total Nitrogen(N).....	20.00%
20% Urea Nitrogen	
Derived from Urea	

**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® M907 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.

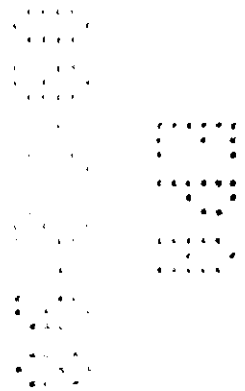
**WHERE TO USE:**

Trimec® M907 Liquid Weed & Feed is especially formulated for sensitive southern grasses - St. Augustinegrass, bentgrass, bahiagrass, bermudagrass and centipedegrass, but can also be used on bluegrass, fescue, and other northern grasses in 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. Trimec® M907 Liquid Weed & Feed also controls the easy to kill weeds such as chickweed, clover, dandelion, knotweed, and plantain. In addition, Trimec® M907 Liquid Weed & Feed also feeds your lawn with a 20% 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 during the growing season when weeds are active 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.



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**(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 gallon package is intended as a refill for the one-half gallon hose end sprayer applicator/container of Trimec® M907 Liquid Weed & Feed. However, this product may be used in any hose end sprayer in which herbicides have been used.

Add Trimec® M907 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.

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**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.

