

2217-741 9/9/2009 Tacket 1099
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

James L. Kunstman
PBI/Gordon Corp.
1217 West 12th Street
P.O. Box 014090
Kansas City, MO 64101

SEP 9 2009

Dear Dr. Kunstman:

Subject: RED Label Amendment: 2,4-D DMA salt and 2,4 DP-p
DMDP 898 Liquid Weed and Feed
EPA Registration Number 2217-741

Your rebuttal has been reviewed and the Agency determined that the requested changes in signal word and related precautionary language and PPE are not acceptable. Due to the change in formulation of this product (from the Acute Toxicity review in January 5, 1988 and the updated review), the remaining requested changes in the EPA letter dated March 20, 2009 are still required.

The product referred to above is in compliance with the 2,4-D RED and is amended under the RED provided that you:

1. The signal word currently on the label "Caution" must be revised to read "Danger."
2. A Note to Physician must be added to the label which reads "probable mucosal damage may contraindicate the use of gastric lavage." In addition, the Agency recommends that additional text be added to the Note to Physician which addresses category I eye irritation concerns.
3. Per the acute toxicity review, the Hazards to Humans and Domestic Animals section must be revised as follows:
 - Add the statement "Wear protective eyewear."
 - Replace the signal word with "Danger"
 - Replace "causes eye irritation" with "Corrosive. Causes irreversible eye damage."
 - Replace "avoid contact with eyes, skin or clothing" with "Do not get in eyes, on skin, or on clothing."
4. This product requires child-resistant packaging.
5. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.

2 of 9

page 2
EPA Reg. No. 2217-741

6. Please note: Final product reregistration can not be considered until after all active ingredients in this product are eligible for reregistration.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Enclosure

DMDP 898 LIQUID WEED & FEED

EPA Reg. No. 2217-741

ACTIVE INGREDIENT:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	3.25%
Dimethylamine salt of (+)-R-2-(2 methyl-4-chlorophenoxy)propionic acid	1.63%
Dimethylamine salt of (+)-R-2-(2,4-dichlorophenoxy)propionic acid	1.61%
INERT INGREDIENTS:	93.51%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.26 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 2.70%
- 0.13 lb (+)-R-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.35%
- 0.13 lb (+)-R-2-(2,4-dichlorophenoxy)propionic acid equivalent per gallon or 1.35%

Isomer Specific by AOAC Methods.

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.	

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
SEP 9 2009

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

KEEP OUT OF REACH OF CHILDREN

2217-741

CAUTION

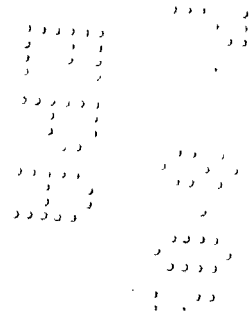
STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

~~**CAUTION:** Harmful if swallowed. Causes eye irritation. Harmful if absorbed through the skin or inhaled. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, socks, shoes and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.~~

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Harmful if inhaled. Avoid breathing spray mist. Wear long-sleeved shirt, long pants, and shoes plus socks. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.



First Aid	
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or on clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have the person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.</p>	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. ~~Do not apply directly to water.~~ Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high watermark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

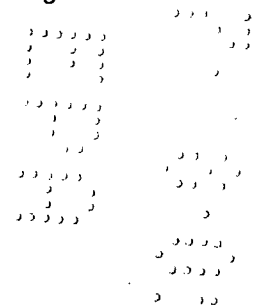
[Environmental Hazards (alternate per PRN 2008-1)

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.



GENERAL PRECAUTIONS AND RESTRICTIONS:

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.
- Do not allow people or pets to enter the treated area until sprays have dried.
- 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 temperatures exceed 85°F.
- Seed can be sown 3 to 4 weeks after application.
- Do not use on carpetgrass, dichondra, closely-mowed bentgrass, nor on lawns or turf where desirable clovers are present.
- This treatment may cause temporary injury (chlorosis or slight yellowing) to St. Augustinegrass and centipedegrass; however, this discoloration will disappear 7 to 10 days after application. Cultivars vary in tolerance to this product. Do not use this product on 'Floratam' St. Augustinegrass.
- Do not exceed specified dosages for any area.
- Do not apply as a fine mist because of potential for injury to desirable plants.
- Do not use this product on or near desirable plants, including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs, since injury may result.
- Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day. Rinse applicator over lawn area only.

WEEDS			
Black medic	Ground ivy	Plantain	Spurge
Buckhorn	Healall	Poison ivy	Wild clover
Burdock	Knotweed	Poison oak	Wild carrot
Chicory	Lambsquarters	Purslane	Wild garlic
Chickweed	Mallow	Ragweed	Wild lettuce
Clover	Morningglory	Red clover	Wild onion
Dandelion	Oxalis (Woodsorrel)	Stitchwort	Yarrow and many other
Dock	Pigweed	Speedwell	broadleaf lawn weeds.
English daisy			

[NOTE TO SUPPLEMENTAL REGISTRANTS. Advisory statements and requirements for fertilizer components are determined by the state agencies and the Association of American Plant Food Control Officials (AAPFCO). Supplemental registrants will be responsible for compliance to the state agency requirements for the sale and distribution of products containing fertilizers. Suggestions are presented as follows:]

Fertilizer Labeling Requirements by Association of American Plant Food Control Officials (AAPFCO): Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metal.htm>.



Statements For The Fertilizer Grade Of 20-0-0:
 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 0.06 to 0.10 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 horticultural extension agent for the proper amount of nitrogen to be applied in your area.

OR
 A lawn will typically utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer by providing 0.06 to 0.10 pounds of nitrogen per 1,000 square feet. Contact your local agricultural horticultural extension agent for questions regarding a regular fertilizer program.

Statements For The Fertilizer Grade Of 15-0-0:
 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 0.05 to 0.08 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 horticultural extension agent for the proper amount of nitrogen to be applied in your area.

OR
 A lawn will typically utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer by providing 0.05 to 0.08 pounds of nitrogen per 1,000 square feet. Contact your local agricultural horticultural extension agent for questions regarding a regular fertilizer program.

Labeling requirement for fertilizers sold and/or distributed in Texas:
 Information about the contents of this product may be obtained by writing to: (Company name and address).

WHERE TO USE:

DMDP 898 Liquid Weed & Feed controls chickweed, clover, dandelion, knotweed, plantain, and most broadleaf weeds in lawns, vacant lots, playgrounds, and other similar areas.

For bentgrass, bermudagrass, Kentucky bluegrass and fescues - Apply DMDP 898 Liquid Weed & Feed with a hose end sprayer at 6.4 fluid ounces of product per 1,000 square feet, 1 quart of product per 5,000 square feet.

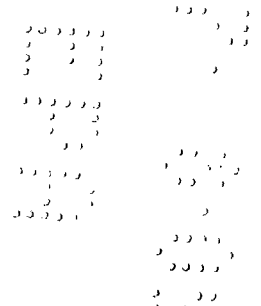
For St. Augustinegrass and centipedegrass - Apply DMDP 898 Liquid Weed & Feed with a hose end sprayer at 4.3 fluid ounces of product per 1,000 square feet, 1 quart of product per 7,500 square feet. Exercise care to avoid over-dosing by spraying evenly and uniformly. This treatment may cause temporary injury (chlorosis) to the St. Augustinegrass and centipedegrass. Do not spray DMDP 898 Liquid Weed & Feed on St. Augustinegrass and centipedegrass during periods of heat stress, high temperatures, or drought stress.

Limitations on broadcast applications to residential turfgrass:

The maximum application rate is 6.4 fl.oz. of product per 1,000 sq.ft. per application (0.57 lb 2,4-D ae, 0.28 lb MCP-P ae and 0.28 lb 2,4-DP-P ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 12.8 fl.oz. of product per 1,000 sq.ft. (1.13 lb 2,4-D ae, 0.57 lb MCP-P ae and 0.57 lb 2,4-DP-P ae per acre per year).

WHEN TO USE:

1. Spray 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 (broadcast) spray treatment. Wait 3 weeks before putting new grass seed or stolons down in the bare spots.
- 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 Sprayer 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 of product will automatically be dispersed. Spray directly over area 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 of product will automatically be dispersed. Spray directly over area 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.

DO NOT ADD WATER TO THE JAR. One quart covers up to 7,500 square feet. One-half gallon covers

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up to 15,000 square feet.

OPTION (F)

Shake Well Before Using. Connect attached spray nozzle to garden hose. Turn the green water control "ON/OFF" valve on top of spray nozzle to the "OFF" position. Turn on water at faucet. Rotate the small red product control valve forward to open. This allows the contents to mix with water.

To begin spraying, point spray nozzle towards area to be treated and turn the green water control "ON/OFF" valve to the "ON" position. The water automatically mixes with the product. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas. To stop spraying, turn the green water control valve to "OFF". Rotate the small red control valve in an upright position to close. To relieve pressure, turn water "ON/OFF" valve to the "ON" position before removing nozzle from hose, being careful to point the nozzle away from you. (OPTIONAL: Refer to graduated scale on side of container to see how much liquid has been used.)

OPTION (G)

Determine the area to be sprayed. Add the appropriate amount of DMDP 898 Liquid Weed & Feed to the hose end sprayer jar and spray evenly over the area to be treated. DO NOT ADD WATER TO THE JAR. The water will automatically mix with this product during spraying. (OPTIONAL: Refer to graduated scale on side of container to see how much liquid has been used.)

Retail Container Size	Treated Area, Square Feet	
	For St. Augustinegrass & centipedegrass	For bentgrass, bermudagrass, Kentucky bluegrass & fescues
1 quart	7,500 sq.ft.	5,000 sq.ft.
2 quarts	15,000 sq.ft.	10,000 sq.ft.
4 quarts (1 gal.)	30,000 sq.ft.	20,000 sq.ft.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children.

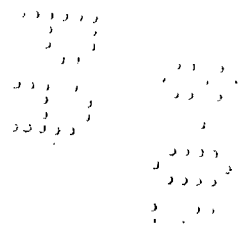
CONTAINER DISPOSAL: ~~If Empty: Do not reuse this container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency or toll-free number (1-800-xxx-xxxx) for disposal instructions. Never place unused product down any indoor or outdoor drain.~~

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or www.website.com for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price



9099

will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- One quart covers up to 7,500 square feet.
- Controls dandelion, chickweed, knotweed, plantain, clover, mallow, purslane and many other broadleaf lawn weeds.
- No spreading - No complicated mixing - Just attach to a garden hose & spray.
- The fast, easy way to weed control and fertilize your lawn.
- Fertilize and control weeds in one easy application.

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00741.20090707.amend-proposed.doc

2. **Reason for Issue:** Incorporate EPA comments, PRN 2007-4

