

2217-743

8/23/2001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1/9

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

AUG 23 2001

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p  
Trimec M891 Weed & Feed  
EPA Registration No. 2217-743  
Your Submission Dated May 18, 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 ▶	Miller							
DATE	8/23/01							

2/9

# TRIMEC® M 891 WEED & FEED FOR SENSITIVE GRASSES 27-3-6

Lawns of St. Augustinegrass, Centipedegrass, Bahiagrass, Bermudagrass,  
Kentucky Bluegrass, Fescue spp., Perennial Ryegrass, Zoysiagrass,  
and Bentgrass May Be Treated.

**ACTIVE INGREDIENTS:**

Dimethylamine salt (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.	0.321%
Dimethylamine salt of 2-methyl-4-chlorophenoxyacetic acid.....	0.353%
Dimethylamine salt of Dicamba: 3,6-dichloro-o-anisic acid.....	0.071%
INERT INGREDIENTS.....	<u>99.255%</u>
<b>TOTAL</b>	<b>100.000%</b>

**THIS PRODUCT CONTAINS:**

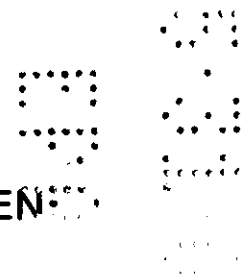
5.32 lbs. or 0.265% (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton.

5.76 lbs. or 0.288% 2-methyl-4-chlorophenoxyacetic acid equivalent per ton.

1.18 lbs. or 0.059% 3,6-dichloro-o-anisic acid equivalent per ton.

Contains single isomer form of Mecoprop-p.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.



**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

**Statement of Practical Treatment**

**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 WEIGHT: (15, 16, 17, 18, OR 20) POUNDS**

EPA REG NO 2217-743 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.

2217-743



3/09

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

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**CAUTION:** Causes eye irritation. Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear long pants, long-sleeved shirt and shoes when applying this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

#### 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.

### 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 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:** Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals. Do not store near food or feedstuffs. To prevent cross-contamination, do not store near other fertilizers, or near herbicides, insecticides, fungicides, or seeds.

**PESTICIDE DISPOSAL:** Securely wrap bag in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse bag. Discard bag in trash.

### INSTRUCTIONS:

Trimec® M891 Weed and Feed for Sensitive Grasses controls a wide range of lawn weeds, including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 27-3-6 fertilizer provides a supply of plant nutrients. Possible retreatment may be necessary if (a) lawn is heavily overrun by weeds, or, (b) if adverse low moisture conditions prevail and weeds are in a state of poor growth. A second application may be made in approximately 30 days. Treated areas may be seeded 3 to 4 weeks after application. Do not use on dichondra. Do not over apply. Under conditions of adequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on St. Augustinegrass.

### HOW MUCH TO APPLY:

Apply 3.0 to 4.0 pounds of this product (Trimec® M 891 Weed & Feed) per 1,000 square feet of established turfgrass. One application with this "X" pound bag will cover (treat) "X" to "X" square feet of turfgrass.

**Note to supplemental registrants:** Refer to the rate table for the appropriate bag sizes and the area to be treated. Select the proper bag size and present only the information for that bag size on your product label.

4/9

Bag Size, Pounds	Desired Rate per 1,000 Sq.Ft., Pounds	Treated Area for this Bag Size, Sq.Ft.
15	3.0	5,000
	3.25	4,615
	3.33	4,505
	3.64	4,121
	4.0	3,750
16	3.0	5,333
	3.25	4,923
	3.33	4,805
	3.64	4,396
	4.0	4,000
17	3.0	5,667
	3.25	5,231
	3.33	5,105
	3.64	4,670
	4.0	4,250
18	3.0	6,000
	3.25	5,538
	3.33	5,405
	3.64	4,945
	4.0	4,500
20	3.0	6,667
	3.25	6,154
	3.33	6,006
	3.64	5,495
	4.0	5,000

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until next watering (see step 4).
3. Apply when weeds are young and actively growing, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to hold the material and prevent dust drift onto nontarget plants.
4. Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

2/4

Drop spreaders, rotary spreaders and other granular equipment should be calibrated for uniform applications. Calibrate (Check) the equipment by applying the product over a measured area and adjust the spreader settings according to these instructions.

- ◆ For 3.0 pounds of product per 1,000 sq.ft.: Check your spreader on 333 sq.ft. and adjust to apply 1.0 pound of product per 333 sq.ft.
- ◆ For 3.25 pounds of product per 1,000 sq.ft.: Check your spreader on 310 sq.ft. and adjust to apply 1.0 pound of product per 310 sq.ft.
- ◆ For 3.33 pounds of product per 1,000 sq.ft.: Check your spreader on 300 sq.ft. and adjust to apply 1.0 pound of product per 300 sq.ft.
- ◆ For 3.64 pounds of product per 1,000 sq.ft.: Check your spreader on 275 sq.ft. and adjust to apply 1.0 pound of product per 275 sq.ft.
- ◆ For 4.0 pounds of product per 1,000 sq.ft.: Check your spreader on 250 sq.ft. and adjust to apply 1.0 pound of product per 250 sq.ft.

**Note to supplemental registrants:** Recommended settings for drop spreaders, rotary spreaders, and other granular equipment may be presented on the container labels. Also, spreader preferences and diagrams for uniform distributions would be acceptable.

**USE PRECAUTIONS:**

- ◆ Do not use this product where desirable clovers are present or allow the material to wind drift onto flowers, vegetables or ornamental shrubbery.
- ◆ Do not apply in areas underlaid by roots of desirable trees or shrubs.
- ◆ Apply when air is calm.
- ◆ Application of this product to newly seeded areas should be delayed until the third mowing.
- ◆ During application, close spreader openings when turning.
- ◆ Do not contaminate domestic or irrigation waters.

<b>27-3-6 GUARANTEED ANALYSIS</b>	
Total Nitrogen (N).....	27%
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ).....	3%
Soluble Potash (K <sub>2</sub> O).....	6%

**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/>."*

4/21

<b>WEEDS CONTROLLED:</b>			
Bedstraw	Ground ivy	Peppergrass	Speedwell
Black medic	Healall	Pigweed	Spurge
Buckhorn	Henbit	Plantain	Thistle
Burdock	Knotweed	Poison ivy	Wild carrot
Chicory	Lambsquarters	Poison oak	Wild garlic
Chickweed	Lespedeza	Purslane	Wild lettuce
Clover	Mallow	Ragweed	Wild onion
Dandelion	Morningglory	Sheep sorrel	Yarrow
Dock	Oxalis	Shepherdspurse	

**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.

7/9

**APPENDIX**

**I. Advertising claims that may be presented on the retail packaging of supplemental registrants:**

- ◆ (Fifteen, Sixteen, or Eighteen) Pounds Covers Up To 5,000 Square Feet.
- ◆ Twenty Pounds Covers Up To 5,500 Square Feet.
- ◆ Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge, and many other broadleaf weeds in St. Augustinegrass, Centipedegrass, Bahiagrass, Bermudagrass, Kentucky bluegrass, Fescue spp., Perennial Ryegrass, Zoysiagrass and Bentgrass lawns.
- ◆ "Patent Pending B.A.S.E.™ System Biologically Active Soil Enrichment: Only Ringer® Supreme Lawn Fertilizers™ use the 'Biologically Active Soil Enrichment™' System (patent pending) to give you truly exceptional turf. Because of activity of microorganisms in the soil is important in providing an optimal growing environment for grass, this unique new fertilizer is specially formulated with organic matter, plant nutrients and high energy sugars to promote maximum microbial activity. The results is a thick, green lawn that will be the envy of your neighborhood."

"Relative Number of Soil Microorganisms Per Gram of Soil:

Ringer® Supreme Lawn Fertilizers™	8x
Leading Brand	1x

Soil microorganism populations were found to be an average of 8 times higher when soil was treated with Ringer® Supreme Lawn Fertilizer™ compared to the leading fertilizer brand (under laboratory conditions, in the top half inch of soil). These are the same organisms that convert organic matter into plant available nutrients for your lawn."

"Benefits of Microbial Activity: Researchers have long known that microbial activity is a key component in a vital soil ecosystem. This activity improves:

- Conversions of organic matter to plant nutrients.
- The soil's ability to retain moisture & infiltrate water to the root zone.
- The soil's ability to hold and release nutrients."

- ◆ Biologically released nitrogen.
- ◆ Thicker Greener Grass - FAST!
- ◆ Deep Root Development
- ◆ Promotes soil vitality.
- ◆ "(Patent Pending) B.A.S.E.™ System Biologically Active Soil Enrichment works like no other lawn care product. Ringers® B.A.S.E.™ System is unique. It works with naturally occurring soil microorganisms in your lawn to slowly release nitrogen promoting a vital root and soil system and thicker, greener grass."
- ◆ Controls dandelion, chickweed, knotweed, plantain, henbit, and spurge.
- ◆ Use whenever weeds are growing.



8/27

**II. Fertilizer grades, guaranteed analyses, and source of nutrients that are required for state registrations:**

- ◆ Previously accepted grades: 24-6-12; 27-3-6; 16-2-6.
- ◆ For Illinois requirements:

<b>GUARANTEED ANALYSIS</b>	
Total Nitrogen (N).....	16%
*6.25% Ammoniacal Nitrogen	
*2.50% Water Insoluble Nitrogen*	
*7.25% Urea Nitrogen	
Available Phosphate(P <sub>2</sub> O <sub>5</sub> ).....	2%
Soluble Potash (K <sub>2</sub> O).....	6%
*This product contains 2.50% slowly available nitrogen. Derived from: Ammonium sulfate, hydrolyzed poultry feather meal, urea, potassium sulfate, diammonium phosphate.	

<b>Soil Amending Guaranteed Analysis</b>			
Active Ingredients:		Inert Ingredients:	
Feather meal.....	19.00%	Binding Materials.....	3.75%
Sugar.....	12.50%	Fertilizer.....	59.25%
Wheat Middlings.....	5.50%		

**III. Referrals to other pesticides or nonpesticides used sequentially and the addition of calendars highlighting the application schedules.**

- ◆ (Brand Name) 4-Pack Fertilizer Program:
  - Step 1. Apply Late Winter-Early Spring. (Brand Name) Prevents crabgrass, foxtail, *poa annua*, spurge and other annual grasses while feeding your lawn with long-lasting, deep-greening controlled-release nitrogen.
  - Step 2. Apply Mid-Late Spring. (Brand Name) Kills over 100 types of weeds, roots and all! Feeds with controlled-release nitrogen for longer lasting greening.
  - Step 3. Apply Late Spring-Summer. (Brand Name) Controls insects while greening your lawn with controlled-release nitrogen for dependable, predictable results!
  - Step 4. Apply Late Summer-Early Fall. (Brand Name) Provides extended greening throughout the summer months with controlled-release nitrogen for dependable, predictable results!



9/9

Step 5.

START USING THE (BRAND NAME) 4-PACK PROGRAM TODAY												
Most Common Turf Grasses	Jan.	Feb.	March	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
Northern Zone				Step 1. Crabgrass Control plus fertilizer		Step 3. Lawn Insect Control with fertilizer	Step 3. Lawn Insect Control with fertilizer					
				Step 2. Weed & Feed				Step 4. Lawn fertilizer				
Transitional Zone			Step 1. Crabgrass control plus fertilizer		Step 3. Lawn Insect Control with fertilizer	Step 3. Lawn Insect Control with fertilizer						
				Step 2. Weed & Feed					Step 4. Lawn fertilizer			
Southern Zone		Step 1. Crabgrass Control plus fertilizer			Step 3. Lawn Insect Control with fertilizer	Step 3. Lawn Insect Control with fertilizer	Step 3. Lawn Insect Control with fertilizer					
				Step 2. Weed & Feed					Step 4. Lawn fertilizer			

- Northern Zone:** Bluegrasses, Ryegrasses, Bentgrasses, Fine Fescue, Tall Fescue
- Transitional Zone:** Bluegrasses, Ryegrasses, Fine Fescue, Tall Fescue, Bermudagrass, Zoysiagrass
- Southern Zone:** Bermudagrass, Zoysiagrass, Centipedegrass, Bahiagrass, St. Augustinegrass

