

OCT 7 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
DM 969 Liquid Weed & Feed
EPA Registration Number: 2217-752
Your Submission Dated September 14, 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 our understanding 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 or cover letter dated September 14, 1998. 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.
3. You must correct the typographical error in the amount of Urea in the formulation shown on page 2 of the CSF. Column 13a should read "412.16" rather than "421.16".

A copy of the revised Confidential Statement of Formula (Basic Formulation, dated 09/14/98) has been hand-corrected (see 3 above) and placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

Enclosure

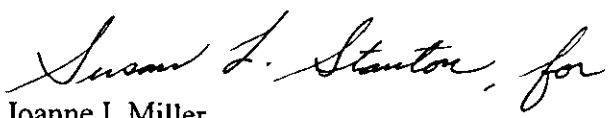
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CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Oct 7, 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)

397

DM 969 LIQUID WEED & FEED

20-0-0

KEEP FROM FREEZING

ONE-HALF GALLON COVERS UP TO 5,000 - 7,500 SQUARE FEET.

Controls Dandelion, Chickweed, Knotweed, Plantains, Clover,
Mallow, Purslane, and many other broadleaf lawn weeds.

No spreading. No complicated mixing.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	2.26%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid.....	2.33%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	1.17%

INERT INGREDIENTS:	96.41%
INERT INGREDIENTS	96.57%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.180 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 1.88%
 - 0.185 lb. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.93%
 - 0.092 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 0.97%
- Isomer Specific by AOAC Methods.

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

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 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 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 TWO QUARTS (Net Weight 4 Lbs. 12 Oz.)

APXXXXXX
 EPA REG. NO. 2217-752
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



ACCEPTED
 with COMMENTS
 In EPA Letter Dated

OCT 7 1998

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-752



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Causes eye irritation. Harmful if inhaled or absorbed through skin. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wear goggles when applying this product. When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater. 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 allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has 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 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, centipedegrass, 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 tree and other ornamental species.

- WEEDS -		
Black Medic	English Daisy	Pigweed
Dock	Knotweed	Plantain
Clover	Lambsquarters	Purslane
Common Chickweed	Mallow	Ragweed
Dandelion	Mouseear Chickweed	and many other
Dock	Oxalis	broadleaf lawn weeds.

597

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

OPTION A OR B TO BE USED DEPENDING ON THE SUBREGISTRATION

OPTION (A)

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 (B)

DM 969 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:

DM 969 Liquid Weed & Feed may be used on bentgrass, bermudagrass, Kentucky bluegrass, fescues, perennial ryegrass, and St. Augustinegrass lawns, vacant lots, playgrounds and other similar areas where broadleaf weeds are present. DM 969 Liquid Weed & Feed controls most 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 three (3) weeks after application before sowing seed or planting stolons.
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.

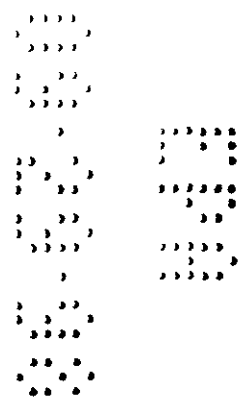
HOW TO USE:

Shake Well Before Using. The maximum number of broadcast applications per treatment site is 2 per year.

For Bermudagrass, Kentucky Bluegrass, Fescues, and Perennial Ryegrass: Apply 13 fluid ounces (26 tablespoons) of product per 1,000 square feet of turfgrass. This product at this rate provides 0.19 pounds of nitrogen per 1,000 square feet per application. One half gallon of product will treat up to 5,000 square feet of turfgrass.

The maximum application rate to turf is 0.8 pounds 2,4-D acid equivalent per acre per application per site.

Area to Treat Square Feet (Sq.Ft.)	Amount of Product	
	English Measure	Fluid Ounces (fl.oz.)
1,000	¾ cup	13
2,500	1.0 quart	32
5,000	2.0 quarts	64
10,000	1.0 gallon	128



For *St. Augustinegrass, Bentgrass*: Apply 8 fluid ounces (16 tablespoons) of product per 1,000 square feet of turfgrass. This product at this rate provides 0.13 pounds of nitrogen per 1,000 square feet per application. One-half gallon of product will treat up to 7,500 square feet of turfgrass.

Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

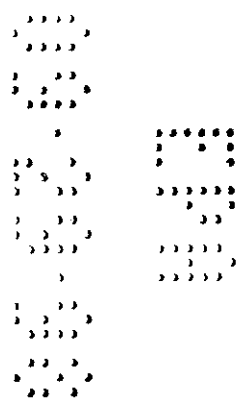
Area to Treat Square Feet (Sq.Ft.)	Amount of Product	
	English Measure	Fluid Ounces (fl.oz.)
1,000	1 cup	8
3,750	1.0 quart	32
7,500	2.0 quarts	64
15,000	1.0 gallon	128
Equal Measures: 16 tablespoons = 8 fluid ounces = 1 cup		

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.



797

APPENDIX

(One Of The Following Will Be Used Depending On The Hose-End Applicator 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 gallon package is intended as a refill for the one-half gallon hose-end sprayer applicator/container of DM 969 Liquid Weed & Feed. However, this product may be used in any hose-end sprayer in which herbicides have been used.

Add DM 969 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.

OPTION (F)

For bermudagrass, Kentucky bluegrass, fescues, and perennial ryegrass:

Hose-end sprayers that require pre-mixing with water: Pour 13 fluid ounces (26 tablespoons) of product into the sprayer jar for every 1,000 square feet of turf. Fill the sprayer jar with water to the proper level and spray to cover 1,000 square feet of turf.

Hose-end sprayers that do not require pre-mixing with water: Pour 13 fluid ounces (26 tablespoons) of product into the sprayer jar for every 1,000 square feet of turf. Do not add water to the sprayer jar. Adjust the metering dial and spray.

OPTION (G)

For St. Augustinegrass and bentgrass:

Hose-end sprayers that require pre-mixing with water: Pour 8 fluid ounces (16 tablespoons) of product into the sprayer jar for every 1,000 square feet of turf. Fill the sprayer jar with water to the proper level and spray to cover 1,000 square feet of turf.

Hose-end sprayers that do not require pre-mixing with water: Pour 8 fluid ounces (16 tablespoons) of product into the sprayer jar for every 1,000 square feet of turf. Do not add water to the sprayer jar. Adjust the metering dial and spray.