



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 30 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Craig Martens
PBI Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Trimec 970 Weed & Feed 12-4-8
EPA Registration Number: 2217-753
Your Submission Dated April 17, 2002

The Agency is conditionally approving an amendment to the registration for 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 Statements of Formula (CSFs) 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 product other than those specified within the body of your certification statement and cover letter dated April 17, 2002. 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. Update the labeling to delete "spray has dried or" under the heading "It is a violation....with its labeling".

A copy of the revised Basic CSF dated August 17, 2001 has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,



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

Enclosure

TRIMEC® 970 WEED & FEED 12-4-8

Fifty Pounds Covers Up To 5,000 Square Feet

Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge and other broadleaf weeds in St. Augustinegrass, Centipedegrass, Bahiagrass, Bermudagrass, Zoysiagrass and Bentgrass lawns.

ACTIVE INGREDIENTS:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.20%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	0.11%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid.....	0.05%

INERT INGREDIENTS:	<u>99.64%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

3.20 lbs. or 0.16% (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid per ton.

1.80 lbs. or 0.09% 2,4-dichlorophenoxyacetic acid per ton.

0.80 lb. or 0.04% dicamba (3,6-dichloro-o-anisic acid) per ton.

Isomer Specific by AOAC Methods.

Contains the 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

See back panel for additional Precautionary Statements.

NET WEIGHT POUNDS

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUL 30 2002

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

2217-753 2217-753

APxxxxxx

EPA REG. NO. 2217-753 Amend

EPA EST. NO. 2217-KS-1

MANUFACTURED BY:



4 8 6



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Do not inhale dust. Do not allow contact with skin, eyes or clothing. When using this product, wear long-sleeved shirt, long pants, socks and shoes.

After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

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. • Call a poison control center or doctor for treatment advice.
If on skin or 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 person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

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: 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.

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-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

USE PRECAUTIONS:

Do not use this product where desirable clovers are present or allow the material to drift onto flowers, vegetables or ornamental shrubbery. Do not spread over exposed roots of trees and ornamentals.

Do not exceed specified dosages for any area; be particularly careful within dripline of tree and other ornamental species.

Apply when the air is calm. Do not apply to newly seeded lawns.

12-4-8 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	12%
Available Phosphate(P ₂ O ₅).....	4%
Soluble Potash (K ₂ O).....	8%

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/>."*

INSTRUCTIONS:

Trimec® 970 Weed & Feed 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 12-4-8 fertilizer provides a supply of plant food needed for a normal season's growth. 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.

Do not use on dichondra.

Do not over-apply.

Under conditions of adequate moisture, high temperature and high humidity, over-application may cause a minor transitory discoloration on St. Augustinegrass.

1. Mow lawn to normal height 1 to 3 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.

The maximum application rate to turf is 0.5 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

Spreader Settings	
Scott.....	6
Lawn Beauty.....	5
Jackson.....	7½
Sears.....	4

The above spreader settings are approximate. Calibrate your spreader on 100 square feet and adjust to apply at the rate of 1 pound per 100 square feet. During application, close spreader openings when turning.

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

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.