

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

FEB 27 2003

SUBJECT: Conversion from MCPP to MCPP-p
EPA Registration No. 2217-796
Your Resubmission Dated October 29, 2002

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 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, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised basic Confidential Statement of Formula, and two (2) alternate CSF's dated October 29, 2002, have been placed in the Agency's file for the subject product. These CSF's supersede all previously submitted CSF's for this product.

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

7505C JIM 2/27/03							
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EH1148 HERBICIDE

ACTIVE INGREDIENTS:

Dimethylamine Salt of (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid.....	4.06%
Dimethylamine Salt of 2,4-dichlorophenoxyacetic acid.....	4.20%
Dimethylamine Salt of Dicamba (3,6-dichloro-o-anisic acid).....	0.92%
INERT INGREDIENTS:.....	90.82%
TOTAL	100.00%

This product contains:

- 0.29 lb. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 3.35%
- 0.30 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 3.50%
- 0.07 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.77%

Contains the single isomer form of Mecoprop-p.
Isomer Specific by AOAC Methods.

KEEP OUT OF REACH OF CHILDREN

WARNING

See side panels for additional Precautionary Statements
and Statement of Practical Treatment

NET CONTENTS: 1 PINT (16 fl.oz.) or 1 QUART (32 fl.oz.)

AP
EPA Reg. No. 2217-796-Amend
EPA Est. No. 2217-KS-X

MANUFACTURED BY:

G *gordon*
pb *pb*
corporation
An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101
1-800-821-7925

ACCEPTED
with COMMENTS
in EPA Letter Dated

FEB 27 2002

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

2217-796



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

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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing.

When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection. 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.

Statement of Practical Treatment

~~IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.~~

~~IF SWALLOWED: Call a physician or Poison Control Center. Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Avoid alcohol.~~

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

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 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.
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.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency, call toll free 1-877-800-5556.</p>	

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 washwaters. Do not apply when weather conditions favor drift from target area.

DIRECTIONS FOR USE

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

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.

STORAGE & DISPOSAL

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STORAGE: Keep from freezing. Store in original container and place in locked storage area.

~~**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.~~

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.

WHERE TO USE:

EH1148 Herbicide controls broadleaf weeds commonly found in cool season and warm season turfgrass in residential/domestic areas. Established turf of St. Augustinegrass, centipedegrass, bermudagrass, bentgrass, bluegrass, fescues, and zoysiagrass may be treated. Residential/domestic areas include turfgrass established around residences, apartment complexes, condominiums, vacant lots, or areas associated with households.

Do not apply this product to carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers. Do not use on Floratam or other improved varieties of St. Augustinegrass in Florida.

The maximum control of weeds will be obtained from spring or fall applications when the weeds are actively growing. However, this product is effective anytime during the growing season. Refer to the partial list of broadleaf weeds controlled by EH1148 Herbicide.

WEEDS CONTROLLED		
Bedstraw	Henbit	Ragweed
Black Medic	Knotweed	Sheep Sorrel
Buckhorn	Lambsquarters	Shepherds Purse
Burdock	Lespedeza	Speedwell
Chicory	Mallow	Spurge
Chickweed	Morningglory	Wild Carrot
Clover	Pepperweed	Wild Garlic
Dandelion	Pigweed	Wild Lettuce
Dock	Plantains	Wild Onion
Dollarweed	Poison Ivy	Yarrow and other
Ground Ivy	Poison Oak	broadleaf weeds
Healall	Purslane	in lawns & turf.

HOW TO USE:

Hose-end sprayers, backpack sprayers, knapsack sprayers, and pressure sprayers are suitable for broadcast treatments. Apply EH1148 Herbicide with sufficient water for good coverage. Spray volumes of 2 gallons per 1000 ft² are recommended.

The rate recommendations for each turfgrass are presented as follows:

Turfgrass	Amount of EH1148 Herbicide	Treated Area (Sq.Ft.) for	
		1 pint (16 fl.oz.) container	1 quart (32 fl. oz.) container
St. Augustinegrass and Centipedegrass	2.8 fl. ozs./1000 ft ²	5,720 ft ²	11,400 ft ²
Bermudagrass and Bentgrass	3.7 fl. ozs./1000 ft ²	4,320 ft ²	8,640 ft ²
Bluegrass, Fescues, and Zoysiagrass	5.6 fl. ozs./1000 ft ²	2,860 ft ²	5,720 ft ²

The maximum application rate to turf is 0.6 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.

Hose-End Sprayers:

Determine the required amount of EH1148 Herbicide from Table 1 for the appropriate area and turfgrass. Spray volumes of 2 gallons per 1,000 square feet are recommended.

For concentrate sprayers, add only the required amount of EH1148 Herbicide listed in Table 1.

For dilution sprayers, add the required amount of EH1148 Herbicide and fill the sprayer with water to the proper level.

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Area to be Treated	Spray Volume	Amount of EH1148 Herbicide		
		St. Augustinegrass, Centipedegrass	Bentgrass, Bermudagrass	Bluegrass, Fescue, Zoysiagrass
250 sq.ft.	1 gal.	0.7 fl. oz.	0.9 fl. oz.	1.4 fl. oz.
1,000 sq.ft.	4 gal.	2.8 fl. oz.	3.7 fl. oz.	5.6 fl. oz.
2,000 sq.ft.	8 gal.	5.6 fl. oz.	7.4 fl. oz.	11.2 fl. oz.
5,000 sq.ft.	20 gal.	14.0 fl. oz.	18.5 fl. oz.	28.0 fl. oz.
6,000 sq.ft.	24 gal.	16.8 fl. oz.	22.2 fl. oz.	33.6 fl. oz.

Equivalent Measures: 1 fluid ounce (fl.oz.) = 2 tablespoons (Tbs.) or 6 teaspoons (tsp.)
2 fl.ozs. = 4 Tbs. 16 fl.ozs. = 1 pint 32 fl.ozs. = 1 quart

Pressure Sprayers:

Determine the required amount of EH1148 Herbicide from Table 2 for the appropriate area and turfgrass. Spray volumes of 2 gallons per 1,000 square feet are recommended. Adjust the sprayer nozzle to deliver a coarse spray and apply uniformly.

Area to be Treated	Spray Volume	Amount of EH1148 Herbicide		
		St. Augustinegrass, Centipedegrass	Bentgrass, Bermudagrass	Bluegrass, Fescues, Zoysiagrass
250 sq.ft.	½ gal.	0.7 fl. oz.	0.9 fl. oz.	1.4 fl. oz.
500 sq.ft.	1 gal.	1.4 fl. oz.	1.9 fl. oz.	2.8 fl. oz.
1,000 sq.ft.	2 gal.	2.8 fl. oz.	3.7 fl. oz.	5.6 fl. oz.
1,500 sq.ft.	3 gal.	4.2 fl. oz.	5.6 fl. oz.	8.4 fl. oz.

Equivalent Measures: 1 fluid ounce = 2 tablespoons or 6 teaspoons

Spot Treatments:

Spot treatments may be appropriate for sparse weed infestations or as a follow-up treatment for dense weed infestations. Mix 1 fluid ounce or 2 tablespoons of EH1148 Herbicide with 1 gallon of water. Spray the weeds only and avoid spray droplets on the turfgrass. Observe a 10 to 14 day interval for follow-up treatments between the first and second application.

APPLICATION SUGGESTIONS:

1. Delay mowing 3 to 4 days before and after the application of this product.
2. Do not apply this product immediately before rainfall or irrigation. Also, rainfall or irrigation within 24 hours after application may reduce the effectiveness. Do not irrigate or water the turfgrass within 24 hours after application.
3. Treated areas of common bermudagrass, bluegrass, and fescue may be reseeded 3 to 4 weeks after application.
4. Do not allow spray to drift to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants since injury may result. 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.
5. Do not apply this product when turfgrass is under stress from drought, insect attack, or high temperatures (90°F). Avoid applications to St. Augustinegrass when the air temperature is greater than 90°F with high relative humidity.

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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.