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Mr. Craig Martens
PBI/Gordon Corporation
P.O. Box 14090
1217 West 12th Street
Kansas City, MO 64101

SEP 15 1997

Dear Mr. Martens:

SUBJECT: Label Amendment in Response to Agency Review of Acute Toxicity Studies
EH1153 Weed and Feed
EPA Reg. No.: 2217-798
Your Submission Dated September 4, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you:

1. Delete the following advertising claims in the Appendix:

- "A 50 foot x 50 foot lawn produces enough oxygen for a family of four."
- "Purifies water"

EPA considers the above claims to be misleading safety claims which, pursuant to FIFRA sec. 2(q)(1)(A) and the regulations at 40 CFR 156.10(a)(5), are not acceptable.

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment. We note that changes to this product's directions for use were made via the notification process on October 8, 1996. Please be aware that PR Notice 95-2 expressly prohibits registrants from making changes in the directions for use by notification. Such changes must be submitted as amendments for Agency review and approval.

Sincerely yours,

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

Enclosure

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #6:S529880.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Sep 15, 1997							

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EH1153 WEED AND FEED

21-3-5

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 15 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-798

ACTIVE INGREDIENTS:

*2-methyl-4-chlorophenoxyacetic acid.....	0.687%
**2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.305%
***Dicamba: 3,6-dichloro-o-anisic acid.....	0.069%
INERT INGREDIENTS.....	98.939%
TOTAL	100.000%

THIS PRODUCT CONTAINS:

- *13.74 lbs. or 0.687% 2-methyl-4-chlorophenoxyacetic acid equivalent per ton.
 - **6.10 lbs. or 0.305% 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton.
 - ***1.38 lbs. or 0.069% 3,6-dichloro-o-anisic acid equivalent per ton.
- Isomer Specific by AOAC Methods.

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional Precautionary Statements.

NET WEIGHT 18 POUNDS

APXXXXXX
EPA REG. NO. 2217-798
EPA EST. NO. 2217-KS-X
MANUFACTURED BY:





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

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Harmful if absorbed through the skin. Avoid contact with skin. 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.

Statement of Practical Treatment

IF ON SKIN: Wash thoroughly with soap and water. Get medical attention.

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

IF SWALLOWED: Call a doctor or get medical attention. **Do not induce vomiting.** Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS:

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

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 AND 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.

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

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

OPTION (1)

WHERE TO USE:

EH1153 Weed and Feed is a Trimec® brand herbicide containing fertilizer, MCPA, mecoprop, and dicamba. This granular weed and feed provides a balanced supply of plant nutrients and controls a broad spectrum of broadleaf weeds in turfgrass. Supplemental nitrogen, phosphorous, and potash should be applied according to soil tests or State Extension Service recommendations.

EH1153 Weed and Feed controls broadleaf weeds commonly found in cool season and warm season turfgrass established in residential/domestic areas. Established turf of Kentucky bluegrass, fescues, and perennial ryegrass may be treated. Established turf of bermudagrass, zoysiagrass, St. Augustinegrass, and centipedegrass 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 bentgrass, carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers.

WHEN TO USE:

The maximum control of weeds will be obtained from spring or fall applications when the weeds are actively growing.

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Dandelion, chickweed, plantains, and henbit are controlled with EH1153 Weed and Feed. A partial list of susceptible weeds is shown below:

Bedstraw	Florida pusley	Puncturevine
Black Medic	Ground ivy	Purslane
Burclover	Healall	Ragweed
Burdock	Heartleaf drymary	Red sorrel
Carpetweeds	Henbit	Sheep sorrel
Chickweed (Common, mouseear)	Knotweed	Shepherdspurse
Chicory	Lambsquarters	Speedwell
Clover (Red, white, yellow)	Mallow	Spurges
Cocklebur	Morningglory	Spurweed
Dandelion	Mustards	Thistles
Dock	Peppergrass	Wild carrot
Dollarweed	Pigweed	Wild garlic
English daisy	Plantains (Buckhorn)	Wild geranium
False dandelion	Poison ivy	Wild onion
Filarees	Poison oak	Yarrow

APPLICATION INSTRUCTIONS:

1. Spring and fall applications to established turfgrass are recommended for the best control. However, EH 1153 Weed and Feed can be applied any time broadleaf weeds are present and actively growing. Application of this product to newly seeded areas should be delayed until the third mowing.
2. Mow the turfgrass 2 to 3 days before application.
3. Water the turfgrass thoroughly (1/2 inch) at least 1 to 2 days before application.
4. It is recommended that this product be applied when plant leaves are moist by dew in the early morning or just after watering the lawn. Herbicide granules retained in water droplets on the leaves are readily absorbed. So, schedule applications in the morning when dew is present. Or, sprinkle or irrigate lightly (1/4 inch) before application to provide maximum control.
5. Do not irrigate or water the turfgrass within 24 hours after application.

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescues, and perennial ryegrass: Apply 3.0 to 4.0 pounds of product per 1,000 square feet of turfgrass. A second or follow-up application may be required for dense infestations of weeds or for adverse seasonal conditions. If needed, the second application of 3.0 to 4.0 pounds of product per 1,000 square feet should be used 30 days after the first application.

For bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass: Apply 3.0 to 3.2 pounds of product per 1,000 square feet of turfgrass. A second or follow-up application may be required for dense infestations of weeds or for adverse seasonal conditions. If needed, the second application of 3.0 to 3.2 pounds of product per 1,000 square feet should be used 30 days after the first application. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

A uniform broadcast distribution of product on the treated area is essential. Choose a calm day to insure uniform coverage and to avoid spreading granules onto flowers, vegetables, and ornamental shrubbery. Do not exceed the specified application rate for any area; and use care in the application of this product within the dripline of trees, shrubs, and other ornamentals.

Drop spreaders and rotary spreaders should be calibrated for uniform applications of this product. Refer to the rate table for the appropriate bag sizes and the area to be treated.

SPREADER PATTERNS:

1. Apply two header strips.
2. Operate spreader the longest way of the lawn.
3. For drop spreaders, overlap wheels to insure complete coverage.

Note to Supplemental Registrants: Select the appropriate bag size and present only the information provided for that bag size on your product labeling. Also, equipment settings of drop spreaders, rotary spreaders, and other granular applicators may be presented on the container labels.

Bag Size (Pounds)	Desired Rate Per 1000 Square Feet (Pounds)	Treated Area For This Bag Size (Square Feet)
15	3.0	5,000
	3.2	4,700
	4.0	3,800
16	3.0	5,300
	3.2	5,000
	4.0	4,000
17	3.0	5,700
	3.2	5,300
	4.0	4,300
18	3.0	6,000
	3.2	5,600
	4.0	4,500
20	3.0	6,700
	3.2	6,300
	4.0	5,000
30	4.0	7,500
35	4.0	8,800
36	4.0	9,000
40	4.0	10,000
45	4.0	11,300
50	4.0	12,500
55	4.0	13,800
60	4.0	15,000

21-3-5 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	21%
Available Phosphate (P ₂ O ₅).....	3%
Soluble Potash (K ₂ O).....	5%

OPTION (2). Format of use instructions requested by supplemental registrant that can be merged with the text of **OPTION (1)**.

APPLICATION INSTRUCTIONS:

Apply this product anytime broadleaf weeds are present and actively growing in lawns comprised of the following northern and southern grasses:

- ◆ bermudagrass
- ◆ centipedegrass
- ◆ perennial ryegrass
- ◆ zoysiagrass
- ◆ fescues
- ◆ St. Augustinegrass
- ◆ Kentucky bluegrass

Do not apply this product to bentgrass, carpetgrass, dichondra, Floratam St. Augustinegrass (in Florida), ornamentals, or lawns containing desirable clovers. Application on newly seeded areas should be delayed until the third mowing.

This bag of (insert supplemental registrant's name) Fertilizer plus Weed Control covers 5,000 square feet of lawn when applied at the recommended rate of 3.2 lbs. per 1,000 square feet. Measure your lawn. A 20 ft. by 50 ft. area equals 1,000 square feet.

PREPARATION FOR APPLICATION:

1. Mow lawn 2 to 3 days before application.
2. Water lawn thoroughly with approximately ½ inch 1 to 2 days before application to sustain moisture until next watering.
3. Apply to moist grass to encourage absorption of broadleaf weed killer by weeds. Sprinkle lawn lightly (approximately ¼ inch) or apply when leaves are wet with dew.

APPLICATION:

The above spreader settings are approximate. You may need to adjust your spreader for proper coverage.

AFTER APPLICATION:

- ◆ Avoid watering or rain on lawn within 24 hours after application.
- ◆ Water lawn thoroughly 1 to 2 days after application to activate fertilizer.

REAPPLICATION:

A second or follow-up application may be required for dense infestations of weeds or for adverse seasonal conditions. If needed, the second application of 3.2 lbs. of product per 1,000 square feet should be used 30 days after the first application.

SPOT APPLICATION OF INDIVIDUAL WEEDS:

For your lawn or other turf areas with desirable grasses, eliminate weeds without harming grass with a liquid lawn weed killer (supplement registrant's name).

----- END OF OPTION 2 -----

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.

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APPENDIX

I. Fertilizer grades that may be used by supplemental registrants with nutrient contents expressed as the percentages of N, P₂O₅ and K₂O include the following:

10-6-4	18-4-8	22-3-6	24-4-8	26-4-6
12-4-4	20-4-6	22-6-6	24-5-10	28-1-5
12-5-5	20-4-8	22-7-7	25-3-3	28-3-3
15-5-10	20-10-0	22-10-10	25-3-5	28-3-7
16-2-3	20-10-5	23-3-3	25-3-8	30-3-5
16-3-5	21-3-5	23-7-7	26-3-3	30-3-10
16-6-9	21-5-7	24-3-6	26-3-5	30-4-8
18-3-5				

The fertilizer grade guaranteed analysis may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.

II. Advertising Claims presented on the container (bag) that may or may not be used by supplemental registrants:

- a) Twenty pounds covers up to 5,000 square feet.
- b) Provides excellent response to the fertilizer plus effective broadleaf weed control.
- c) Combines the advantages of fertilization plus a broad range of weed control.
- d) Well maintained lawn benefits our environment.
 - Apply when weeds are young and actively growing.
 - Provides vital nutrients plus time-released nitrogen which encourages grass to fill in bare spots weeds leave behind.
 - Contains sulfur which helps maintain dark green color and encourages plant and root growth.
- e) Grass Cycling and Lawn Benefits: Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients will go back into your lawn.
- f) Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:
 - A 50 foot x 50 foot lawn produces enough oxygen for a family of four.
 - Controls erosion
 - Reduces glare
 - Traps dust, smoke particles and other pollutants
 - Purifies water
 - Reduces noise
 - Improves soil condition
 - Modifies temperature



Professional Lawn Care Association of America

- g)
 - Controls broadleaf weeds.
 - Exclusive 4-way greening.
 - Low phosphate formulation.

Your lawn benefits.

- Thick, green grass
- Deep root development
- Soil vitality
- New low phosphate formulation.
- Kills dandelions plus (__) other weeds in 3 - 4 weeks.
- Kills roots and all. Works on growing weeds.
- Greens your lawn without excessive growth.
- Quick green-up in 3 - 5 days after watering, continuing long lasting green for up to 3 months.
- Thickens your lawn.
- Promotes lush, even, deep-green turf.
- Exclusive 4-way greening.

White granule - Quick release nitrogen starts greening in 3 - 5 days.

Yellow granule - Slow release nitrogen releases slowly over time (OR) Slow Release Nitrogen releases slowly greening your lawn over time.

Green granule - Stabilized nitrogen continues greening for up to 3 months, releasing as your lawn needs it. (OR) Stabilized nitrogen. Continuous greening for up to 2 months - available as your lawn needs it.

Brown granule - Long term slow-released nitrogen with natural nutrient fertilizer components (OR) Safer Brand's unique natural fertilizer components with slow release nitrogen.

Fertilizer Grade		
NITROGEN 28	PHOSPHATE 1	POTASH 5
Deep Green	Root Growth	Resilience
4 kinds of nitrogen promote deep greening without excessive growth. (OR) Exclusive 4-way greening without excessive growth.	Low phosphate formulation supplements naturally occurring phosphorus in your soil. (OR) Low phosphate formulation. Excess phosphate runoff can harm lakes, streams and waterways.	Potassium source that strengthens grasses to withstand heat, cold and drought stresses.

- Principles of successful lawn maintenance: (OR) Successful lawn maintenance includes:

Spring and fall applications - (Product Name)

Good weather - Sun, 60 - 80°F

1" water once a week including rainfall. A typical sprinkler applies 1" moisture in 3 - 4 hours.

Proper mowing height - Remove only 1/3 of grass height at each mowing.

Optimum thatch level of a lawn is 1/4" to 1/2"

Annual soil aeration.

- h) The Safer® Brand Advantage.

- Contains a combination of natural and synthetic fertilizer components.
- Sixteen pounds covers 5,000 square feet.
- Enhances soil and plant vitality for a vigorous, green lawn.
- Safer's innovative fertilizer formulation.
- For driveways, patios in or around flower and vegetable gardens or other similar areas where total weed elimination is desirable, use Safer® Brand Superfast Brand Weed and Grass Killer.
- 100% Satisfaction Guarantee: Safer guarantees you will be satisfied with the performance of this product when used as directed, or you will be eligible for a refund or replacement. Simply send us evidence of your purchase, reason for your dissatisfaction and your name and address.
- In case of emergency call 1-800-XXX-XXXX (Supplemental registrant's phone number).