

2217-798

7/6/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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JUL 6 2009

Subject: MCPP-p RED Label Amendments  
EH-1153 Weed and Feed 21-3-5  
EPA Reg. No. 2217-798

The labeling referred to above is in compliance with the MCPP-p RED and is amended under the RED provided that you:

1. Submit and/or cite all data required for registration review/reregistration of your product when the Agency requires all registrants of similar products to submit data.
2. Make the following revisions to the product label:
  - a. Per the MCPP-p RED, the **Environmental Hazards** text "This pesticide may be toxic to fish, aquatic invertebrates, and aquatic plants" is no longer required and must be replaced with the text "**This pesticide may adversely affect non-target plants.**" In addition, the following paragraph must be added to this section: "**This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.**"
  - b. The Agency recommends that a **Note to Physician** be added to the label that addresses eye irritation concerns. The following statements are suggested types of information that could be included:
    - technical information on symptomatology;
    - use of supportive treatments to maintain life functions;
    - company telephone number to specific medical personnel who can provide specialized medical advice
  - c. Remove the word "recommended" in the last paragraph on page 4 of 7.

- d. As mentioned in the Agency letter dated June 20, 2008, “long-sleeved shirt, long pants, shoes and socks” must be listed in addition to the PPE currently listed in the Hazards to Humans and Domestic Animals section. As this product has occupational uses (“around ...apartments complexes, condominiums, vacant lots...”), the PPE section must be reformatted to the following:

**“Personal Protective Equipment (PPE)**

Some materials that are chemical-resistant to the product are made of any waterproof material. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, and other handlers must wear:  
Goggles or face shield,  
Long-sleeved shirt and long pants,  
Shoes plus socks, and  
Chemical-resistant gloves

Follow manufacturer’s instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE/clothing separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product’s concentrate. Do not reuse them.”

- e. As this product has occupational uses, a “User Safety Recommendations” box must be added immediately following the PPE requirements with the following text included:

**“USER SAFETY RECOMMENDATIONS**

- Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.”

**NOTE:** This information must be removed from the Hazards to Humans and Domestic Animals section to avoid redundancy.

- f. Per the MCCP-p RED, the current text under the ‘**General Precautions and Restrictions**’ section must be replaced with the following:

“Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

-Do not enter or allow others to enter the 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.”

- g. Per the MCCP-p RED, the **minimum retreatment interval** of 21 days must be changed to **30** days.
- h. In reference to the “Statements which may appear on different label components depending on packaging configuration” of the Appendix, the **Net Contents/Net Weight** must be listed on the **front panel** of the product labeling. See FIFRA 2(q)(2)(C)(iii); 40 CFR 156.10(a)(1)(iii).
- i. Remove the following marketing claims as they imply the product possesses special/unique characteristics because of its composition: See 40 CFR 156.10(a)(5)(i)
  - “... **unique** natural fertilizer components...”
  - “**Exclusive** 4-way greening...”
- j. Remove the following marketing claim as this product/formulation is no longer ‘new’:
  - “**New** low phosphate formulation.”
- k. Remove the following marketing claim as it is too general in meaning:
  - “Kills roots **and all**.”
- l. Revise the **container handling and residue removal** language of the Storage and Disposal statements so that they comply with PR Notice 2007-4 as an occupational use product.  
See chapter 13 of the label review manual for guidance at:  
<http://www.epa.gov/oppfead1/labeling/lrm/chap-13.htm>

4. Please Note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

A stamped copy of your labeling is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after 12 months from the date of this Letter or the next printing of the label whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,

Joanne Miller  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

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# EH-1153 WEED AND FEED 21-3-5

## EPA Reg. No. 2217-798

ACTIVE INGREDIENT:	
MCPA acid .....	0.69%
Mecoprop-p acid .....	0.15%
Dicamba acid .....	0.06%
INERT INGREDIENTS .....	99.10%
TOTAL .....	100.00%

THIS PRODUCT CONTAINS:  
 13.8 lb 2-methyl-4-chlorophenoxyacetic acid equivalent per ton, or 0.69%.  
 3.0 lb (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton, or 0.15%.  
 1.2 lb 3,6-dichloro-o-anisic acid equivalent per ton, or 0.06%.  
 Isomer Specific by AOAC Methods.

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
 JUL 6 2009  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.

**KEEP OUT OF REACH OF CHILDREN**

### WARNING

STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY. 2217-798

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**WARNING:** Causes substantial but temporary eye injury. Harmful if absorbed through the skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid	
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or on clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>



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<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.</p>	

**Environmental Hazards**

This pesticide may be toxic to fish, aquatic invertebrates, and aquatic plants. Do not apply directly to water. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours. Do not contaminate water when disposing of equipment washwater or rinsate.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**GENERAL PRECAUTIONS AND RESTRICTIONS**

- Do not apply this product in a way that will contact any person, or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the 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.

**[LABEL OPTION 1]**

**WHERE TO USE:**

EH-1153 Weed and Feed is a Trimec® brand herbicide containing fertilizer, MCPA, mecoprop-p, and dicamba. This granular weed and feed provides 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.

EH-1153 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.

Dandelion, chickweed, plantain, and henbit are controlled with EH-1153 Weed and Feed. A partial list of susceptible weeds is shown below:

Bedstraw Black medic Burclover Burdock Carpetweed Chickweed (common,	Dollarweed English daisy False dandelion Filarees Florida pusley Ground ivy	Morningglory Mustards Peppergrass Pigweed Plantain (buckhorn) Poison ivy	Sheep sorrel Shepherdspurse Speedwell Spurge Spurweed Thistle
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mouseear)	Healall	Poison oak	Wild carrot
Chicory	Heartleaf drymary	Puncturevine	Wild garlic
Clover (red, white, yellow)	Henbit	Purslane	Wild geranium
Cocklebur	Knotweed	Ragweed	Wild onion
Dandelion	Lambsquarters	Red sorrel	Yarrow
Dock	Mallow		

**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.

**For bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass:** Apply 3.0 to 3.2 pounds of product per 1,000 square feet of turfgrass. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

The maximum broadcast application rate is 4.0 pounds of product per 1,000 sq.ft. per application (1.2 lb MCPA ae, 0.26 lb MCPP-p ae and 0.10 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 21 days between applications. The maximum seasonal rate is 8.0 pounds of product per 1,000 sq.ft. (2.40 lb MCPA ae, 0.52 lb MCPP-p ae and 0.20 lb dicamba ae per acre per year).

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.

Do not use this product on or near desirable plants, and avoid spreading granules onto exposed root systems or adventitious shoots (rhizomes) within the drip line of desirable trees and shrubs, since injury may result.

Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day. 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.

8 of 11

[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 1,000 Sq.Ft., Pounds	Treated Area For This Bag Size, Sq. Ft.	Bag Size, Pounds	Desired Rate Per 1,000 Sq.Ft., Pounds	Treated Area For This Bag Size, Sq. Ft.
15	3.0	5,000	20	3.0	6,700
	3.2	4,700		3.2	6,300
	4.0	3,800		4.0	5,000
16	3.0	5,300	30	4.0	7,500
	3.2	5,000	35	4.0	8,800
	4.0	4,000	36	4.0	9,000
17	3.0	5,700	40	4.0	10,000
	3.2	5,300	45	4.0	11,300
	4.0	4,300	50	4.0	12,500
18	3.0	6,000	55	4.0	13,800
	3.2	5,600	60	4.0	15,000
	4.0	4,500			

21-3-5 GUARANTEED ANALYSIS	
Total Nitrogen (N) .....	21%
Available Phosphate (P2O5) .....	3%
Soluble Potash (K2O) .....	5%

**Labeling Requirements:**

- Information regarding the contents and levels of metals in this product is available on the internet at <http://www.aapfco.org/metals.htm> .

**[LABEL 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:

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

Do not apply this product to bentgrass, carpetgrass, dichondra, 'Floritam' 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 lb per 1,000 square feet. Measure your lawn. A 20 ft. by 50 ft. area equals 1,000 square feet.



The maximum broadcast application rate is 4.0 pounds of product per 1,000 sq.ft. per application (1.2 lb MCPA ae, 0.26 lb MCPP-p ae and 0.10 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 21 days between applications. The maximum seasonal rate is 8.0 pounds of product per 1,000 sq.ft. (2.40 lb MCPA ae, 0.52 lb MCPP-p ae and 0.20 lb dicamba ae per acre per year).

**PREPARATION FOR APPLICATION:**

1. Mow lawn 2 to 3 days before application.
2. Water lawn thoroughly with approximately 1/2 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 1/4 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 lb of product per 1,000 square feet should be used 21 days after the first application.

**STORAGE AND DISPOSAL**

**PESTICIDE 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-XXX-XXXX) for disposal instructions. Never place unused product down any indoor or outdoor drain.

**LIMITED WARRANTY AND DISCLAIMER**

FOR USE ONLY AS DIRECTED.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

## **APPENDIX**

### **1. Statements which may appear on different label components depending on packaging configuration.**

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: \_\_\_\_\_
- EPA Est. No. \_\_\_\_\_

### **2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:**

- 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:
  - Controls erosion
  - Reduces glare
  - Traps dust, smoke particles and other pollutants
    - Reduces noise
    - Improves soil condition
    - Modifies temperature
    - Controls broadleaf weeds.
    - Exclusive 4-way greening.
- Low phosphate formulation.
  - g) 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.



Professional Lawn Care Association of America

- 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° to 80°F
  - 1" water once a week including rainfall. A typical sprinkler applies 1" moisture in 3 to 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.

**3. Fertilizer grades that may be used by supplemental registrants with nutrient contents expressed as the percentages of N, P2 O5 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.

**DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-00798.20090225.proposed.doc
2. **Reason for Issue:** Various changes pertaining to MCPA and MCP-p reregistration. Re-format label.