

2217-799

6-20-2008

1/9



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

20 JUN 2008

James L. Kunstman
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 14090
Kansas City, MO 64101

Dear Dr. Kunstman:

Subject: RED Label Amendment Dicamba, MCPP-p and 2,4-D
EH-1154 Weed and Feed 21-3-5
EPA Registration Number 2217-799

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

1. The Agency recommends that a Note to Physician be added to the label that addresses eye irritation concerns.
2. Because this product contains occupational uses ("around...apartment complexes, condominiums, vacant lots..."), PPE text appearing in the Hazards to Humans and Domestic Animals must be revised per the acute toxicity review and the RED to read:

"Personal Protective Equipment
Loaders, applicators and other handlers must wear:
Long sleeved shirt and long pants,
Shoes plus socks,
Goggles or face shield, and
Chemical-resistant gloves made of any waterproof material."

3. The text "This pesticide may be toxic to fish, aquatic invertebrates and aquatic plants" is no longer required and may be deleted from the label.
4. User Safety Requirements text, as required in the MPCA RED for occupational use products, must be added to the label:

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

2/9

page 2

EPA Reg. No. 2217-~~867~~ 799

5. User Safety Recommendations, as required in the MCPA RED for occupational use products, must be added to the label and be placed in a box. Duplicate text appearing in the Hazards to Humans and Domestic Animals section must be deleted:

“User Safety Recommendations

User should wash hands before, eating, drinking, chewing gum, tobacco, of using the toilet.

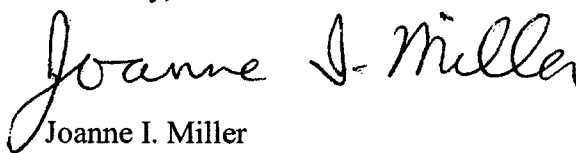
User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.”

6. Under the Warranty section add “To the extent consistent with applicable law” in front of “the company makes no other” and “the exclusive remedy”.
7. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,



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

Enclosure

Tracy
3/9

Secondary Review of 2217-799

Delete paragraph 1. The Spanish Signal Word is required by Worker Protection Standard for agricultural use products. This product is for use on domestic turfgrass and is not subject to WPS .

4/19

EH-1154 WEED AND FEED

21-3-5

ACTIVE INGREDIENTS:

2-methyl-4-chlorophenoxyacetic acid.....	0.56%
(+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.12%
Dicamba: 3,6-dichloro-o-anisic acid.....	0.05%
INERT INGREDIENTS:.....	<u>99.27%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 11.2 lbs. 2-methyl-4-chlorophenoxyacetic acid equivalent per ton, or 0.56%.
 - 2.4 lbs. or (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton, or 0.12%.
 - 1.0 lb. 3,6-dichloro-o-anisic acid equivalent per ton, or 0.05%.
- Contains the single isomer form of Mecoprop-p.
Isomer Specific by AOAC Methods.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

20 JUN 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

2217-799

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional Precautionary Statements and First Aid.

NET WEIGHT 18 POUNDS

AP-----

EPA REG. NO. 2217-799
EPA EST. NO. 2217-KS-X
MANUFACTURED BY:



Telephone: 1-800-821-7925

5/9



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

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 (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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 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 the 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. You may also contact 1-877-800-5556 for emergency medical treatment advice.	

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.

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

6/9

WHERE TO USE:

EH-1154 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-1154 Weed and Feed controls broadleaf weeds commonly found in cool season and warm season turfgrass established in residential/domestic areas. Established turf of bermudagrass, zoysiagrass, St. Augustinegrass, and centipedegrass may be treated. Also, Kentucky bluegrass, fescues, and perennial ryegrass 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-1154 Weed and Feed. A partial list of susceptible weeds is shown below:

Bedstraw	Dandelion	Knotweed	Purslane
Black medic	Dock	Lambsquarters	Ragweed
Burdock	Ground ivy	Peppergrass	Sheep sorrel
Chicory	Healall	Pigweed	Shepherdspurse
Chickweed	Henbit	Plantain	Thistle
Clover			

APPLICATION INSTRUCTIONS:

1. Spring and fall applications are recommended for the best control. However, EH-1154 Weed and Feed can be applied any time broadleaf weeds are present and actively growing. Treatments of newly established warm season turfgrass should be delayed until 3 to 4 weeks after the sodding, sprigging or plugging operations. Application of this product to newly seeded areas of cool season grasses should be delayed until the third mowing.
2. Mow the turfgrass 2 to 3 days before application.
3. Water the turfgrass thoroughly (½ 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 (¼ inch) before application to provide maximum control.
5. Do not irrigate or water the turfgrass within 24 hours after application.

7/9

HOW MUCH TO APPLY:

For bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass: Apply 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 4.0 pounds of product per 1,000 square feet should be used 30 days after the first application.

For Kentucky bluegrass, fescues, and perennial ryegrass: Apply 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 4.0 pounds of product per 1,000 square feet should be used 30 days after the first application.

Do not apply more than 1.5 lb. MCPA acid equivalent per acre per year or 6.2 pounds of product per 1,000 sq. ft. per year.

Do not make more than 2 applications per year with a minimum retreatment interval of 21 days.

A uniform broadcast distribution of product on the treated area is essential. 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.

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 Square Feet, Pounds	Treated Area For This Bag Size, Square Feet
15	4.0	3,800
16	4.0	4,000
17	4.0	4,300
18	4.0	4,500
20	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%

8/9

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>

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.

9/9

APPENDIX

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

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

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:

- ◆ Twenty pounds covers up to 5,000 square feet.
- ◆ Provides excellent response to the fertilizer plus effective broadleaf weed control.
- ◆ Combines the advantages of fertilization plus a broad range of weed control.