



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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P.O. Box 14090
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JUL 6 2009

Subject: MCPP-p RED Label Amendments
EH-1154 Weed and Feed 21-3-5
EPA Reg. No. 2217-799

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 revisions listed in the Agency's RED amendment letter dated June 20, 2008
3. 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

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- c. 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.”

- d. 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.

- e. 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.”

- f. Per the MCCP-p RED, the **minimum retreatment interval** of 21 days must be changed to **30** days.
- g. 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).
- h. 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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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.

2217-799

EH-1154 WEED AND FEED 21-3-5

EPA Reg. No. 2217-799

ACTIVE INGREDIENT:

MCPA acid	0.56%
Mecoprop-p acid	0.12%
Dicamba acid	0.05%

INERT INGREDIENTS:	99.27%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 11.2 lb 2-methyl-4-chlorophenoxyacetic acid equivalent per ton, or 0.56%.
- 2.4 lb (+)-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%.

Isomer Specific By AOAC Methods.

KEEP OUT OF REACH OF CHILDREN

WARNING

STOP! 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 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	
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.

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 (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.

- Do not irrigate or water the turfgrass within 24 hours after application.

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 21 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.

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.

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	Bag Size, Pounds	Desired Rate Per 1,000 Square Feet, Pounds	Treated Area For This Bag Size, Square Feet
15	4.0	3,800	36	4.0	9,000
16	4.0	4,000	40	4.0	10,000
17	4.0	4,300	45	4.0	11,300
18	4.0	4,500	50	4.0	12,500
20	4.0	5,000	55	4.0	13,800
30	4.0	7,500	60	4.0	15,000
35	4.0	8,800			

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>

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] 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:

- 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.

3. 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

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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:** 002217-00799.20090225.proposed.doc
2. **Reason for Issue:** Various changes pertaining to MCPA and MCPP-p reregistration. Re-format label.