

2217-811

11/13/2008

1/9



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

NOV 13 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. James L. Kunstman, Ph.D.
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, Missouri 64101

Dear Mr. Kunstman:

Subject: EH-1328 Weed and Feed
Label Amendment
EPA Registration No. 2217-811
Submission Dated: June 3, 2008

The labeling referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide act, as amended is acceptable with the following provisions:

1. Under the heading Directions for Use, revise as follows:

It is a violation... with its labeling.

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.

2. Under the heading Environmental Hazards, revise to read as follows:

This pesticide may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters or rinsate.

EH1328 WEED AND FEED

29-3-4

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	0.78%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .	0.15%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)	0.04%
INERT INGREDIENTS:	99.03%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 13.00 lbs. or 0.65% 2, 4-dichlorophenoxyacetic acid equivalent per ton.
- 2.60 lbs. or 0.13% (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton.
- 0.60 lb. or 0.03% 3, 6-dichloro-o-anisic acid equivalent per ton.
- Isomer Specific by AOAC Methods.
- TRIMEC® is a registered trademark of PBI/Gordon Corporation.
- Contains the single isomer form of Mecoprop-p.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
NOV 13 2008

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

KEEP OUT OF REACH OF CHILDREN

2217-811

CAUTION

See back panel for additional Precautionary Statements and First Aid.

NET WEIGHT (15, 16, 17, 18, 20, or 36) POUNDS

AP060308
 EPA REG. NO. 2217-811
 EPA Est. No. 2217-KS-1



Telephone: 800-821-7925



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed or if absorbed through skin. Causes (moderate) eye injury (irritation). Avoid contact with skin, eyes or clothing. When using this product, wear long-sleeved shirt, long pants, socks and shoes.

After using this product, remove clothing and launder separately before reuse; and promptly and thoroughly wash hands and exposed skin with soap and water.

First Aid

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 give anything by mouth to an unconscious person. Do not induce vomiting unless told to by a poison control center or doctor.
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:	<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.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

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 washwater.

DIRECTIONS FOR USE

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 dust has 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 & DISPOSAL

STORAGE: Store in original container 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.

USE PRECAUTIONS:

Do not use this product where desirable clovers are present or allow the material to drift onto flowers, vegetables or ornamental shrubbery. Apply when the air is calm. Do not apply to newly seeded lawns until after the third mowing.

WHERE TO USE:

EH1328 Weed and Feed controls a wide range of lawn weeds including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a 29-3-4 fertilizer provides a supply of plant food. Supplemental nitrogen, phosphorous, and potash should be applied according to soil tests or State Extension Service recommendations.

EH1328 Weed and Feed controls broadleaf weeds commonly found in cool season and warm season turfgrass established in residential 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 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.

APPLICATION INSTRUCTIONS:

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering (see step 4).
3. Apply when weeds are young and growing actively, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to hold the material and prevent dust drift onto nontarget plants.
4. Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

APPLICATION INSTRUCTIONS: (Optional Tabular Format)

Application Schedule	Cultural Practices
1 - 2 days before application	Mow lawn to normal height 1 to 2 days before application.
1 day before application	Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering.
Day of application	Apply when weeds are young and growing actively, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to hold the material and prevent dust drift onto nontarget plants.
1 - 2 days after application	Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescues, and perennial ryegrass, bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass: Apply 3.0 to 3.6 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. The second application of 3.0 to 3.6 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.

The maximum application rate to turf is 1.1 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.

A uniform 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 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.

CALIBRATION INSTRUCTIONS:

Refer to the rate table (in the appendix) for the appropriate bag sizes and the area to be treated.

- For 3.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 330 square feet and adjust to apply at the rate of 1 pound of product per 330 square feet.
- For 3.2 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- For 3.4 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 300 square feet and adjust to apply at the rate of 1 pound of product per 300 square feet.
- For 3.6 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.

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	Application Rate, Pounds/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet
15	3.0	5,000
	3.2	4,700
	3.4	4,400
	3.6	4,200
16	3.0	5,300
	3.2	5,000
	3.4	4,700
	3.6	4,400
17	3.0	5,600
	3.2	5,300
	3.4	5,000
	3.6	4,700
18	3.0	6,000
	3.2	5,600
	3.4	5,300
	3.6	5,000
20	3.0	6,600
	3.2	6,300
	3.4	5,900
	3.6	5,600
36	3.0	12,000
	3.2	11,200
	3.4	10,600
	3.6	10,000

SPREADER PATTERNS AND PRODUCT DISTRIBUTION:

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

SINGLE PASS DISTRIBUTION:

First spread the borders of your lawn. Then spread the center by spreading in straight line passes. Spread at a uniform walking speed to insure even coverage [Graphics Optional]. To avoid gaps and streaks, first spread the border and fill in center with uniform, parallel passes.

Coverage - To determine how much you need to apply, multiply the length of your lawn by its width. This equals your total square footage. Deduct all non-lawn areas (house, gardens, etc.). One bag covers up to XXX square feet. [Graphics Optional]

Advisory For Fertilizers Containing Iron:

- Contains 1% Iron
- Keep this product off sidewalks, patios, driveways, etc. This fertilizer contains iron which will stain concrete and painted surfaces. If it comes in contact with concrete surfaces, sweep off immediately before flushing with water. If concrete is wet when contact occurs, staining may be impossible to prevent. Be careful when using rotary spreaders which scatter fertilizer beyond lawn edge and onto concrete.

- BROADLEAF WEEDS -

Annual yellow sweetclover	Cockle	Musk thistle	Spiny amaranth
Aster	Cocklebur	Mustard	Spiny cocklebur
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spiny sowthistle
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted catsear
Beggarticks	Cudweed	Nettle	Spotted spurge
Betony, Florida	Curly dock	Orange hawkweed	Spurweed
Bindweed, field	Daisy, English	Oriental cocklebur	Stinging nettle
Bird vetch	Daisy fleabane	Oxalis	Strawberry, India mock
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall nettle
Bittercress, hairy	Dandelion	Parsnip	Tall vervain
Bitterweed	Dichondra	Pearlwort	Tansy ragwort
Black-eyed Susan	Dogbane	Pennycress	Tansy mustard
Black medic	Dogfennel	Pennywort	Tanweed
Black mustard	Dollarweed	Peppergrass	Thistle
Blackseed plantain	Elderberry	Pepperweed	Trailing crownvetch
Blessed thistle	False dandelion	Pigweed	Tumble mustard
Bloodflower milkweed	Falseflax	Pineywoods bedstraw	Tumble pigweed
Blue lettuce	False sunflower	Plains coreopsis (tickseed)	Velvetleaf
Blue vervain	Fiddleneck	Plantain	Venice mallow
Bracted plantain	Florida pusley	Poison ivy	Virginia buttonweed
Brassbuttons	Frenchweed	Poison oak	Virginia creeper
Bristly oxtongue	Galinsoga	Pokeweed	Virginia pepperweed
Broadleaf dock	Goathead	Poorjoe	Water pennywort
Broadleaf plantain	Goldenrod	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Ground ivy	Prickly lettuce	Western clematis
Buckhorn	Gumweed	Prickly sida	Western salsify
Buckhorn plantain	Hairy fleabane	Prostrate knotweed	White mustard
Bulbous buttercup	Hawkweed	Prostrate pigweed	Wild aster
Bull thistle	Healall	Prostrate spurge	Wild buckwheat
Bullnettle	Heartleaf drymary	Prostrate vervain	Wild carrot
Burclover	Heathaster	Puncturevine	Wild four-o'clock
Burdock	Hedge bindweed	Purslane, common	Wild garlic
Burning nettle	Hedge mustard	Ragweed	Wild geranium
Burweed	Hemp	Red sorrel	Wild lettuce
Buttercup	Henbit	Redroot pigweed	Wild marigold
Buttonweed	Hoary cress	Redstem filaree	Wild mustard
Canada thistle	Hoary plantain	Rough cinquefoil	Wild onion
Carolina geranium	Hoary vervain	Rough fleabane	Wild parsnip
Carpetweed	Horsenettle	Russian pigweed	Wild radish
Catchweed bedstraw	Jimsonweed	Russian thistle	Wild rape
Catnip	Knawel	Scarlet pimpernel	Wild strawberry
Catsear	Knotweed	Scotch thistle	Wild sweet potato
Chickweed, common	Kochia	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lambsquarters	Shepherdspurse	Woodsorrel
Chicory	Lespedeza	Slender plantain	Woolly croton
Cinquefoil	Mallow	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Matchweed	Smooth dock	Woolly plantain
Clover, hop	Mexicanweed	Smooth pigweed	Wormseed
Clover, red	Milk vetch	Sorrel	Yarrow
Clover, strawberry	Morningglory	Sowthistle	Yellow rocket
Clover, sweet	Mouseear hawkweed	Spanishneedles	Yellowflower pepperweed
Clover, white	Mugwort	Speedwell	and other broadleaf weeds

Fertilizer Labeling Requirements:

- All fertilizer products distributed in Washington at a minimum, must have the following labeling statement: "This product has been registered with the Washington State Department of Agriculture. When applied as directed, this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product."
- After July 1, 1999, the label must also state: "Information received by the Washington State Department of Agriculture regarding the components in this product is available on the internet at <http://www.wa.gov/agr/>."
- For Texas: Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.xxxxx.com>.

Referrals to other sequentially used products:

- For best results, apply (brand name) products.
- Apply using the 4-Step Program
- **Forevergreen 4-Step Program:**
 - STEP 1:* Forevergreen Crabgrass Preventor - Apply March - early May - Prevents crabgrass and most other annual weed grasses. - Greens your lawn with extended feeding nitrogen.
 - STEP 2:* Forevergreen Weed & Feed - Apply May - June - Kills dandelion, clover, plantain and over XXX other broadleaf weeds. - Thickens and greens your lawn with extended feeding nitrogen.
 - STEP 3:* Forevergreen Lawn Food - Apply June - August - Thickens and promotes a lush green lawn. - Greens with iron and sulfur. - Thickens and greens your lawn with extended feeding nitrogen.
 - STEP 4:* Forevergreen Winterizer & Weed Control - Apply late August - mid October - Kills dandelion, clover, plantain and over XXX other broadleaf weeds. - Slow release nitrogen for long lasting feeding.
- OR**
- STEP 4:* Forevergreen Starter & Winterizer - Apply late August - November - Slow release nitrogen for long lasting feeding. - Enhances root building and prepares your lawn for winter dormancy. - Use with new seeding and sodding of turfgrass.

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 statement 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.

APPENDIX

I. Previously Approved Fertilizer Grades:

- ◆ Fertilizer grades with nutrient contents expressed as the percentages of N, P₂O₅, and K₂O include the following: 23-3-7 and 29-3-4

22-0-8	26-0-3	
22-0-10	29-3-4	
23-3-7		

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

23-3-7 GUARANTEED ANALYSIS	
Total Nitrogen (N).....	23%
Water Insoluble Nitrogen.....	5%
Available Phosphate (P ₂ O ₅).....	3%
Soluble Potash (K ₂ O).....	7%

II. Advertising claims appropriate for the bag size:

- ◆ (Fifteen, Sixteen, Seventeen, Eighteen, or Twenty) Pounds Covers Up To 5,000 Square Feet.
- ◆ Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge and other broadleaf weeds.
- ◆ Controls (Number) weeds!
- ◆ Answers to FAQ's on the internet at www.xxxxx.com
- ◆ Contains slow release nitrogen for long lasting feeding without burning, when applied as directed.
- ◆ Continual root development for a thick, lush lawn.

III. The following advertising claims may be used on container labels, or in advertisements or other promotional material for the subject product:

• Green Cycle

- Spring
 - Crabgrass Control & Lawn Food
- Summer
 - Weed & Feed
- Fall
 - Lawn Food
- Winter
 - Fall & Winter Lawn Food

- Lilly Miller Ultragreen [product] feeds and protects all year long!
- **A Granular Fertilizer Containing Trimec® Herbicide Which Controls [weeds]**
- **Specially formulated to promote root building and winter hardiness!**
- **Slow release nitrogen for a longer lasting green lawn**
- **Controls Over 150 Broadleaf Weeds!**
- **Prepares Your Lawn For Winter!**
- **100% Satisfaction Guarantee Or Your Money Back**