

PM 23

8/27/97

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

AUG 27 1997

Dear Mr. Martens:

SUBJECT: Label Amendment Increasing Rate for Turf and Adding Optional Directions
For Domestic and Nondomestic Use Patterns
EH1329 Weed and Feed
EPA Registration No. 2217-812
Your Application Dated August 11, 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. Revise the beginning of the "Environmental Hazards" section (For Option 2, Domestic and Nondomestic Use Patterns) to read as follows:

"This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants."

The rest of this section, beginning with "For terrestrial uses, ..." is acceptable.

2. On page 2, in the "Storage and Disposal" section under "OPTION 1", revise the last sentence of the Storage instructions to read as follows:

"Do not store unopened or unused, open containers near feed or foodstuffs."

A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

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:S528639.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Aug 27, 1997							

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EH1329 WEED AND FEED

29-3-4

ACTIVE INGREDIENTS:

*Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid	0.61%
**Dimethylamine Salt of 2-(2-methyl-4-chlorophenoxy)propionic acid	0.30%
***Dimethylamine Salt of Dicamba (3,6-dichloro-o-anisic acid).....	0.05%
INERT INGREDIENTS:.....	<u>99.04%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- *10.20 lbs. or 0.51% 2, 4-dichlorophenoxyacetic acid equivalent per ton.
 - **5.00 lbs. or 0.25% 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton.
 - ***0.80 lbs. or 0.04% 3, 6-dichloro-o-anisic acid equivalent per ton.
- Isomer Specific by AOAC Methods.
TRIMEC® is a registered trademark of PBI/Gordon Corporation.

KEEP OUT OF REACH OF CHILDREN

ACCEPTED
with COMMENTS
In EPA Letter Dated

CAUTION

AUG 27 1997
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-812

See back panel for additional Precautionary Statements
and Statement of Practical Treatment.

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

APXXXXXX
EPA REG. NO. 2217-812
EPA EST. NO. 2217-KS-1
MANUFACTURED BY:



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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.

Statement of Practical Treatment

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

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

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

ENVIRONMENTAL HAZARDS (FOR OPTION 1, OUTDOOR DOMESTIC USE ONLY):

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 washwaters.

ENVIRONMENTAL HAZARDS (FOR OPTION 2, DOMESTIC AND NONDOMESTIC USE PATTERNS):

Drift or runoff may adversely affect nontarget plants. For terrestrial uses, do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

Most cases of groundwater contamination involving phenoxy herbicides such as MCP and 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCP and 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

OPTION 1). OUTDOOR DOMESTIC USE WITH APPLICATIONS BY HOMEOWNERS ONLY.

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 and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals. Do not store unused, open containers near feed or foodstuffs.

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

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

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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:

EH1329 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 balanced supply of plant food. Supplemental nitrogen, phosphorous, and potash should be applied according to soil tests or State Extension Service recommendations.

EH1329 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. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

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, perennial ryegrass, bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass: 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. 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.

The maximum application rate to turf is 1.0 pound 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

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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 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 330 sq.ft. and adjust to apply at the rate of 1 lb. of product per 330 sq.ft.
- ◆ For 3.2 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 310 sq.ft. and adjust to apply at the rate of 1 lb. of product per 310 sq.ft.
- ◆ For 3.4 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 300 sq.ft. and adjust to apply at the rate of 1 lb. of product per 300 sq.ft.
- ◆ For 3.6 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 275 sq.ft. and adjust to apply at the rate of 1 lb. of product per 275 sq.ft.
- ◆ For 4.0 lbs. of product per 1,000 sq.ft. of turfgrass: Check your spreader on 250 sq.ft. and adjust to apply at the rate of 1 lb. of product per 250 sq.ft.

- WEEDS -		
Bedstraw	Knotweed	Ragweed
Black Medic	Lambsquarters	Sheep sorrel
Buckhorn	Lespedeza	Shepherdspurse
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Oxalis	Thistle
Clover	Peppergrass	Wild Carrot
Dandelion	Pigweed	Wild Garlic
Dock	Plantain	Wild Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow
Henbit	Purslane	

OPTION 2). DOMESTIC AND NONDOMESTIC USE PATTERNS.

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

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Paper and Plastic Bags - Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke.

WHERE TO USE:

EH1329 Weed and Feed is a Trimec® herbicide containing fertilizer, 2,4-D, 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.

EH1329 Weed and Feed is intended to be applied by commercial applicators, maintenance applicators, service technicians, lawn care operators, and landscape personnel. Cool season and warm season grasses established in institutional, ornamental, and residential sites may be treated.

Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations; for example: hospitals, nursing homes, schools, museums, libraries, sport facilities, and office buildings may be treated.

Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, and institutional buildings. Finally, residential sites are defined as areas associated with the household or home life including, but not limited to apartment complexes, condominiums, and patient care areas of nursing homes, mental institutions, hospitals, or convalescent homes.

Established turf of Kentucky bluegrass, fescues, and perennial ryegrass may be treated. Established turf of bermudagrass, zoysiagrass, St. Augustinegrass, and centipedegrass may be treated. Do not apply this product to carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

Applications of EH1329 Weed and Feed to newly seeded cool season grass are recommended after the third mowing or after the grass seedlings have tillered. Applications to newly established warm season turfgrass are recommended at 3 to 4 weeks after the sodding, sprigging, or plugging operations.

APPLICATION INSTRUCTIONS:

1. Mow the turfgrass 1 to 2 days before application.
2. Water lawn thoroughly ($\geq \frac{1}{2}$ inch) at least 1 day before application to sustain moisture until the next watering.
3. Apply when weeds are young and growing actively. Schedule applications in the morning when dew is present. Or, sprinkle or irrigate lightly ($\leq \frac{1}{4}$ inch) before application to provide maximum control.
4. Rainfall or irrigation within 24 hours after application may reduce the effectiveness. Do not irrigate or water the turfgrass within 24 hours after application.

APPLICATION INSTRUCTIONS: (Optional Tabular Format)

APPLICATION SCHEDULE	CULTURAL PRACTICES
1 - 2 days before application	Mow the turfgrass 1 to 2 days before application.
1 day before application	Water lawn thoroughly ($\geq \frac{1}{2}$ inch) at least 1 day before application to sustain moisture until the next watering.
Day of application	Apply when weeds are young and growing actively. Schedule applications in the morning when dew is present. Or, sprinkle or irrigate lightly ($\leq \frac{1}{4}$ inch) before application to provide maximum control
1 - 2 days after application	Rainfall or irrigation within 24 hours after application may reduce the effectiveness. Do not irrigate or water the turfgrass within 24 hours after application

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HOW MUCH TO APPLY:

For Kentucky bluegrass, fescues, perennial ryegrass, bermudagrass, zoysiagrass, St. Augustinegrass and centipedegrass: 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. 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.

The maximum application rate to turf is 1.0 pound 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.

CALIBRATION INSTRUCTIONS:

1. Drop spreaders, centrifugal (rotary) spreaders, and other granular equipment should be calibrated for accurate and uniform applications of this product.
2. Calibrate the equipment by applying the product over a measured or known area and adjust the equipment according to the recommendations of the equipment manufacturer.
3. Collect the product output over a known distance and swath width. Many drop spreaders are equipped with catch pans.
4. Adjust the spreader opening in the hopper bottom until the desired application rate is obtained.

Note to Supplemental Registrants: Refer to the rate table for the appropriate bag sizes and the area to be treated. Select the appropriate bag size and present only the information provided for that bag size on your product labeling.

Bag Size, Pounds	Desired Rate Per 1,000 Sq. Ft., Pounds	Treated Area For This Bag Size	
		Acres	Sq. Ft.
15	3.0 - 4.0	----	3,800 - 5,000
20	3.0 - 4.0	----	5,000 - 6,600
25	3.0 - 4.0	----	6,250 - 8,300
30	3.0 - 4.0	----	7,500 - 10,000
35	3.0 - 4.0	----	8,750 - 11,700
40	3.0 - 4.0	----	10,000 - 13,300
45	3.0 - 4.0	0.26 - 0.34	11,250 - 15,000
50	3.0 - 4.0	0.29 - 0.38	12,500 - 16,700
55	3.0 - 4.0	0.32 - 0.42	13,750 - 18,300
60	3.0 - 4.0	0.34 - 0.46	15,000 - 20,000

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- WEEDS -		
Bedstraw	Knotweed	Ragweed
Black Medic	Lambsquarters	Sheep sorrel
Buckhorn	Lespedeza	Shepherdspurse
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Oxalis	Thistle
Clover	Peppergrass	Wild Carrot
Dandelion	Pigweed	Wild Garlic
Dock	Plantain	Wild Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow
Henbit	Purslane	

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. Container Packaging and Size:

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.

A) OPTION 1). OUTDOOR DOMESTIC USE:

Bag Size, Pounds	Application Rate, Pounds/1000 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
	4.0	3,800
16	3.0	5,300
	3.2	5,000
	3.4	4,700
	3.6	4,400
	4.0	4,000
17	3.0	5,600
	3.2	5,300
	3.4	5,000
	3.6	4,700
	4.0	4,200
18	3.0	6,000
	3.2	5,600
	3.4	5,300
	3.6	5,000
	4.0	4,500
20	3.0	6,600
	3.2	6,300
	3.4	5,900
	3.6	5,600
	4.0	5,000

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.
4. Close spreader openings when turning.

II. Previously Approved Fertilizer Grades:

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

22-3-5	26-2-4	29-3-4
23-3-7	26-3-4	
25-3-3	27-2-4	

- ◆ 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.

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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%

III. Advertising claims appropriate for the bag size:

- ◆ (Fifteen, Sixteen, Seventeen, Eighteen, or Twenty) Pounds Covers Up To _____ Square Feet.
- ◆ Controls Dandelion, Chickweed, Knotweed, Plantains, Henbit, Spurge and other broadleaf weeds.