

2217-817

8/30/2001

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

AUG 30 2001

Craig Martens  
PBI/Gordon Corporation  
P.O. Box 014090  
1217 West 17<sup>th</sup> Street  
Kansas City, MO 64101

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p  
EH 1350 Weed and Feed  
EPA Registration Number: 2217-817  
Your Submission Dated May 23, 2001

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statements of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statements of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised Confidential Statements of Formula Basic and Alternate Formulations, dated May 23, 2001 has been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

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A stamped copy of the labeling 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

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# EH1350 WEED AND FEED

## 29-3-4

### ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid .....	0.67%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.17%
Dimethylamine salt of Dicamba (3,6-dichloro-o-anisic acid).....	0.06%
INERT INGREDIENTS.....	<u>99.10%</u>
TOTAL	100.00%

### THIS PRODUCT CONTAINS:

11.2 lbs. or 0.56% 2, 4-dichlorophenoxyacetic acid equivalent per ton.  
 2.8 lbs. or 0.14% (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton.  
 1.0 lb. or 0.05% 3, 6-dichloro-o-anisic acid equivalent per ton.  
 Isomer Specific by AOAC Methods.  
 Contains single isomer form of MCPP-p.  
 TRIMEC® is a registered trademark of PBI/Gordon Corporation.

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

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

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

AP  
 EPA Reg. No. 2217-817 Amend  
 EPA EST. NO. 2217-KS-1  
 MANUFACTURED BY:



ACCEPTED  
 with COMMENTS  
 in EPA Letter Dated  
 AUG 30 2001

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
2217-817



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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:**

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, or area where surface water is present, or to intertidal areas below the mean high water mark. 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.

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

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

#### **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:**

EH1350 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.

EH1350 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 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. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

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.

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 example: (Fifteen, Sixteen, Seventeen, Eighteen, or Twenty) pounds covers up to 5,000 square feet.

- ◆ 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.
- ◆ For 4.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet.

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[Equipment settings of drop spreaders, rotary spreaders, and other granular equipment may be presented on the container labeling as requested by supplemental registrants.]

**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/>."*

- 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.

**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.

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
	4.0	3,750
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	4,250
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, P<sub>2</sub>O<sub>5</sub>, and K<sub>2</sub>O include the following: 23-3-7 and 29-3-4
- ◆ 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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<b>23-3-7 GUARANTEED ANALYSIS</b>	
Total Nitrogen (N) .....	23%
Water Insoluble Nitrogen.....	5%
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ).....	3%
Soluble Potash (K <sub>2</sub> O).....	7%

**III. 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.