



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

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

Mr. Craig Martens
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, Missouri 64101

FEB 8 2002

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
EH-1356 Herbicide
EPA Registration Number: 2217-821
Your Amendment Application
Submission Dated November 9, 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 Statement(s) 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 Statement(s) 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 and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (Basic Formulation, dated 11/07/01) has been placed in the Agency's file for the subject product. The amended labeling and basic CSF supersede all previously accepted ones.

M. HOWARD
PM TEAM 23
(703) 305-6784

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)

Enclosures

EH1356 HERBICIDE MANUFACTURING CONCENTRATE

FOR FORMULATING USE ONLY.
FOR USE IN FORMULATING TRIMEC® HERBICIDES
NOT FOR RESALE.

ACTIVE INGREDIENTS:	
2-methyl-4-chlorophenoxyacetic acid.....	45.00%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	9.00%
Dicamba: 3,6-dichloro-o-anisic acid.....	4.50%
INERT INGREDIENTS:.....	41.50%
TOTAL	100.00%

Contains the single isomer form of Mecoprop-p.
TRIMEC® is a trademark of PBI/GORDON CORPORATION.

KEEP OUT OF REACH OF CHILDREN

DANGER

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

NET WEIGHT: _____ POUNDS

AP
EPA Reg. No. 2217-821 Amend
EPA EST NO 2217-KS-1
MANUFACTURED BY:



ACCEPTED
with **COMMENTS**
In EPA Letter Dated
FEB 8 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-821



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled, or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Statement of Practical Treatment

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a physician or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

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

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS:

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters, unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Instructions must be followed in strict accordance with the manufacturer's recommendations for formulating use.

STORAGE & DISPOSAL

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

STORAGE: Store in original container. To prevent cross-contamination, do not store near other pesticides, fertilizers, food, feed, or seeds.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. 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: Completely empty bag into formulation 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.

ONLY FOR FORMULATING INTO A HERBICIDE FOR THE FOLLOWING USES:**1. TERRESTRIAL NONFOOD**

- Ornamental lawns and turfgrasses established in institutional, ornamental, industrial and residential/domestic sites.
 - Noncropland (uncultivated agricultural areas, uncultivated nonagricultural areas, general soil treatments).
 - Recreational areas (golf courses, athletic fields, sport facilities).
 - Domestic outdoors (noncommercial homeowner use and commercial use).
2. Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
 3. Uses for experimental purposes that are in compliance with USEPA requirements.
 4. This product may be used to formulate product for specific uses not listed on the MP label if the formulator, user group, or grower has complied with USEPA data submission requirements regarding the support of such uses.

Formulators using this product are responsible for obtaining EPA registration for their formulated product.

MANUFACTURER TO FURNISH USER WITH COMPLETE DIRECTIONS FOR USE IN ACCORDANCE WITH HIS FORMULATIONS.**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.