

JUL 29 2002

Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
1217 West 17th Street
Kansas City, MO 64104

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
EH1355 Weed and Feed
EPA Registration Number: 2217-822
Your Submission Dated April 30, 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 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 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 basic Confidential Statement of Formula dated November 7, 2001 has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

M. Coake

7-29-02

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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

EH1355 WEED & FEED

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- Feeds your lawn while controlling weeds.
- Controls dandelion, clover, ragweed, lambsquarters, and over 100 other weeds listed on the back panel.
- Weeds that come into contact with this product gradually die and disappear from the lawn.
- For use on bahiagrass, common bermudagrass, Kentucky bluegrass, centipedegrass, fescue spp., perennial ryegrass, St. Augustinegrass, and zoysiagrass.
- Do not use on dichondra, carpetgrass, or where desirable clovers are present.

ACTIVE INGREDIENTS:

2-methyl-4-chlorophenoxyacetic acid.....	0.82%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.16%
Dicamba: 3,6-dichloro-o-anisic acid.....	0.08%
INERT INGREDIENTS:	<u>98.94%</u>
TOTAL	100.00%

Contains the single isomer form of Mecoprop-p.

GUARANTEED ANALYSIS	
Total Nitrogen (N).....	XX%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅).....	X%
Soluble Potash (K ₂ O).....	X%
Primary Plant Foods Derived from:	
Chlorine (Cl) Maximum.....	X%

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

Note to Supplemental Registrants: Guarantees for plant nutrients other than nitrogen, phosphorous, and potassium may be permitted or required by regulation by the _____. The guarantees for such other nutrients shall be expressed in the form of the element. The source (oxides, salts, chelates, etc.) of such other nutrients may be required to be stated and may be included on the label.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

NET WEIGHT: 16, 17, 18, 19 AND 20 POUNDS

AP
EPA REG NO. 2217-822 Amend
EPA EST. NO. XXXX-XX-X
MANUFACTURED BY



Telephone: 800-821-7925

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

JUL 29 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-822



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

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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Statement of Practical Treatment

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, or if available, by administering syrup of ipecac. If person is unconscious, do not give anything by mouth and do not induce vomiting.

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.

ENVIRONMENTAL HAZARDS:

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. 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.

Do not reenter or permit others to reenter treated areas until dusts have settled.

EH1355 Weed & Feed is a stable mixture of three herbicides. It is for use on lawns, ornamental turf, golf courses (fairways, aprons, tees and roughs), parks, cemeteries, and other similar noncrop areas.

This product may be used on bahiagrass, common bermudagrass, Kentucky bluegrass, centipedegrass, fescue *spp.*, perennial ryegrass, St. Augustinegrass, and zoysiagrass. Do not use on dichondra and carpetgrass. Do not use this product where desirable clovers are present or allow the product to drift onto flowers, vegetables, ornamentals, shrubs, trees, or other desirable plants.

Our easy to follow lawn care system: You can have a greener, thicker lawn with ChemLawn's™ new annual system of lawn care designed by America's Authority on Lawn Care™. Just follow the 4 easy steps using TruGreen® by ChemLawn™ fertilizer products for guaranteed results!

Start right away!

Don't wait for the first step of the system! Simply use the recommended product during the current season to begin your program toward a better lawn.

Easy to follow one step at a time, follow the easy to understand directions for use. Each product is especially formulated to provide your lawn with what it needs at just the right time of year.

Step 1: Apply late winter - early spring. TruGreen® Crabgrass Preventer + Lawn Fertilizer prevents crabgrass, foxtail, *poa annua*, spurge and other annual grasses while feeding your lawn with a long-lasting, deep-greening controlled-release (fertilizer/nitrogen).

Step 2: Apply mid - late spring. EH1355 Weed & Feed kills over 100 varieties of weeds, roots, and all. Feeds with Polyon® controlled-release nitrogen for longer lasting greening.

Step 3: Apply late spring - summer. TruGreen® Professional Lawn Fertilizer provides extended greening throughout the summer months with Polyon® controlled-release nitrogen for dependable, predictable results.

[OR]

Apply late spring - summer. TruGreen® Lawn Insect Control with Fertilizer controls insects while greening your lawn with controlled-release nitrogen for dependable, predictable results.

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Step 4: Apply fall. TruGreen® Professional Fall/Winter Fertilizer feeds your lawn during the critical winter months to help it better survive harsh weather conditions. Encourages strong root development and earlier greening in the spring.

[OR]

Apply late summer - early fall. TruGreen® Lawn Fertilizer provides extended greening throughout the summer months with controlled-release nitrogen for dependable, predictable results.

This product is designed to promote lush green growth in lawns and to control such broadleaf weeds as: Beggartick, Bindweed, Black medic, Buckhorn, Burcucumber, Burdock, Buttercup, Canada thistle, Carpetweed, Catsear, Chervil, Chicory, Chickweed, Cinquefoil, Clover, Cocklebur, Croton, Daisy, Dandelion, Dock, Dogfennel, Dragonhead mint, English daisy, Fat hen, Fennel, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Halberd-leaf saltbush, Hawkweed, Healall, Heartleaf drymary, Hempnettle, Henbit, Hoary cress, Honeysuckle, Jimsonweed, Knotweed, Kochia, Lambsquarters, Mallow, Marshelder, Mexican poppy, Morningglory, Mustard, Nettle, Oxalis, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Prickly lettuce, Puncturevine, Purslane, Ragweed, Red clover, Red root, Red sorrel, Redstem, Sheep sorrel, Shepherdspurse, Sicklepod, Smartweed, Sneezeweed, Sow thistle, Spanish needles, Speedwell, Spurge, Spurweed, Stinging nettle, Stinkweed, Stitchwort, Sunflower, Thistle, Thornapple, Toadflax, Veronica, Vetch, Whitebrush, White top, Wild aster, Wild carrot, Wild geranium, Wild gooseberry, Wild lettuce, Wild marigold, Wild onion, Wild petunia, Wild radish, Wild sage, Wild garlic, Wild jute, Wintercress, Witchweed, Woodsorrel, Yarrow, Yellow charlock, Yellow daisy, and Yellow rocket.

WHEN TO APPLY:

Best results are obtained when weeds are growing actively in spring or early fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results: (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain, sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off the herbicide (weed-killing material); (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

Note: When applying to southern grasses under conditions of inadequate moisture, high temperature, and high humidity, over-application may cause minor transitory discoloration on centipedegrass and St. Augustinegrass. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid turf injury (to avoid turf injury, possible dehydration or browning of grass).

HOW TO APPLY:

This 16 pound bag should be used on 5,000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is also acceptable.

The following settings are approximate for applying contents of this package at a suggested rate of 3.2 pounds of product per 1,000 square feet. Check your spreader on 250 square feet and adjust at the rate of 0.8 pounds of product per 250 square feet. Spreader settings will vary among various commercial fertilizer manufacturers. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed.

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SPREADER SETTINGS FOR ONE PASS APPLICATION	
Make	Setting
Central Calibrated	5
Cyclone Broadcast	3 ³ / ₄
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

Optional Spreader Instructions:

For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning. (Illustration)

For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly. (Illustration)

- ◆ This 17 pound bag should be used on 5,300 square feet of turfgrass.
- ◆ This 18 pound bag should be used on 5,600 square feet of turfgrass.
- ◆ This 19 pound bag should be used on 5,900 square feet of turfgrass.
- ◆ This 20 pound bag should be used on 6,300 square feet of turfgrass.

Sweep (do not wash) all fertilizer materials from surfaces immediately after application because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

For state registrations in Kentucky, add the following:

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing (*Number of pounds) of nitrogen per 1,000 square feet (Optional P₂O₅ and K₂O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

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/>."*

STORAGE & DISPOSAL

STORAGE: Always use original bag to store pesticides and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals.

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

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

NOTICE:

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

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APPENDIX

I. Advertising claims that may be presented on the container (retail) labeling of supplemental registrants.

- ◆ Contains Trimec®.
- ◆ Trimec® is a registered trademark of PBI/Gordon Corporation.
- ◆ Environmental benefits described by the Professional Lawn Care Association of America (PLCAA): (Grasscycling Logo) Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

<p>Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will provide smaller grass clippings that will decompose more readily so nutrients go back into your lawns.</p>	<ul style="list-style-type: none">✓ Reduces glare and reduces noise✓ Traps dust, smoke particles & other pollutants✓ Improves soil condition & controls erosion
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- ◆ Feeds your lawn while controlling weeds.
- ◆ Controls dandelion, clover, ragweed, lambsquarters, and over 100 other weeds listed on the _____ panel.
- ◆ Greens quick - stays green!
- ◆ OFFERS OF SATISFACTION PROVIDED BY SUPPLEMENTAL REGISTRANTS:
 - ◇ Our people and expertise make for greener lawns.
 - ◇ At TruGreen-ChemLawn™ it is our people that make us America's Authority on Lawn Care™. The strength and experience of more than 10,000 employees have helped us to see and touch more than a million acres of turfgrass all across America. In our two nationally recognized research centers, we continue to test and develop new products for your lawn. Our fertilizers are specially customized to meet the specific climate and growing conditions in your area.

The people of TruGreen-ChemLawn™ are proud to provide high quality products for your lawn care needs. Thank you for choosing us. If you are not totally satisfied with our product, we will gladly refund your money, just call us at 1-800-288-LAWN.
 - ◇ Satisfaction guaranteed or your money back.

If for any reason you are not satisfied with this product, please send the UPC bar code from the bag and a cash register receipt to: TruGreen-ChemLawn™ Attn.: (person's name) PO Box 17168 Memphis, TN 38120-9792.
We'll promptly refund your money.
Available exclusively through TruGreen-ChemLawn™ Memphis, TN 38120-9792.

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◆ ADVERTISING CLAIMS OFFERED BY PURSELL INDUSTRIES, INC:

- ◇ Pursell's Polyon[®] Timed-Release Capsules
- ◇ The "Smart" Plant Food. Patented Polymer Technology. Once dubbed by a competitor as the "single greatest invention in the history of lawn care," Pursell's Polyon[®] timed-release coating technology was developed after decades of searching for the "perfect" plant food . . . a fertilizer that would slowly and precisely feed with virtually no waste.
- ◇ The "Smart" Plant Food. Each Polyon[®] "smart" green capsule is designed to release its contents by osmosis, nature's way of diffusing nutrients. With Polyon[®] capsules, the warmer the temperature, the faster the rate of fertilizer release . . . matching the plants natural growth cycle.
- ◇ Extra long lasting. Unlike most ordinary fertilizers which release most of their nutrients with the first passing shower, Pursell's Polyon[®] timed-release capsules resist rainfall, releasing slowly for up to three months . . . ensuring a thick, beautiful, healthy lawn that will be the envy of your neighborhood.
- ◇ User friendly. Pursell's Polyon[®] based fertilizer is easy to use - you simply spread it and forget it! No dust, no burn, no worry! The efficient timed-release system keeps nitrogen in the root zone until it is depleted.
- ◇ Questions? Lawn Care Hotline 1-800-288-LAWN.