2217-883

215/2007

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#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 5 2007

#### **CERTIFIED**

James L. Kunstman PBI/Gordon Corporation P.O. Box 014090 Kansas City, Missouri 64101-0090

Dear Dr. Kunstman:

SUBJECT: Label Amendment (Submitted as a Notification) EH-1415 Weed & Feed EPA Registration No. 2217-883 Your Application Dated September 8, 2006

The label amendment referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided the following revision is made:

1. Delete "Superior" from "Superior Broadleaf Weed in Cool Weather".

2. Revise the "Environmental Hazards" statement to read: "This pesticide is toxic to fish and aquatic invertebrates. Do not apply to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as note on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate. This chemical has properties and characteristics associated with chemicals detached in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater."

3. Under the "Directions for Use" revise the "Entry Restrictions" statement to read: "Do not allow people or pets to enter the treated area until dusts have settled." In addition, add the following "Entry Restriction" statement: Do not apply this product in a way that will contact any person, pet, either directly or through drift. Keep people and pets out of the area during application."

A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling incorporating the requested revision before you release the product for shipment. This amended labeling supersedes all previously accepted ones.

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Please note, you must submit an updated appendix to the Confidential Statement of Formula for this product listing the 18-0-6 fertilizer ratio. Insure that <u>all</u> the fertilizer ratios listed on this draft label are contained on this updated appendix. Submit this appendix within 30 days of the date of this letter.

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Sincerely yours,

- 2 -

Joanne D. Miller

Joanne I. Miller Product Manager (23) Herbicide Branch Registration Division (7505P)

# EH-1415 WEED & FEED

#### ACTIVE INGREDIENTS:

2,4-D, 2-ethylhexyl ester	1.153%
Mecoprop-p acid	0.174%
Dicamba acid	0.073%
Sulfentrazone	<u>0.034%</u>
OTHER INGREDIENTS:	98.566%
TOTAL	100.000%

#### THIS PRODUCT CONTAINS:

15.30 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton or 0.765%
3.48 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.174%
1.46 lbs. 3,6-dichloro-o-anisic acid equivalent per ton or 0.073%
0.68 lbs. N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1yl]phenyl]methanesulfonamide per ton or 0.034% CAS Registry Numbers: 2,4-D CAS# 1928-43-4 Mecoprop-p CAS# 16484-77-8 Dicamba CAS#1918-00-9 Sulfentrazone CAS #122836-35-5

Isomer Specific by AOAC Methods TRIMEC<sup>6</sup> is a registered trademark of PBI/Gordon Corporation.

[Guaranteed Analysis and other required fertilizer-related statements may be presented on the front panel of the container label. A sample Guaranteed Analysis and possible statements are presented in the Appendix on page 9 of this master label.]

## **KEEP OUT OF REACH OF CHILDREN**

## CAUTION

See back panel for additional Precautionary Statements and First Aid.

### NET WEIGHT: 14, 15, 16, 17, 18, 19, 20, 25 or 30 POUNDS

FL 987 AP090906 EPA Reg. No. 2217-883 EPA EST. NO. 2217-KS-2 MANUFACTURED BY:



### ACCEPTED with COMMENTS In EPA Letter Dated:

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FEB 5 2007 Under the Federal Insecticide. Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No

2217-883



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

#### PRECAUTIONARY STATEMENTS

#### Hazards to Humans & Domestic Animals

**CAUTION:** Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. When using this product, wear long-sleeved shirt, long pants, socks and shoes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

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First Aid			
If in eyes:	<ul> <li>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.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>		
if swallowed:	<ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>		
Have the product treatment. You	ct container or label with you when calling a poison control center or doctor or going for may also contact 1-877-800-5556 for emergency medical treatment information.		

#### **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.

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.

#### 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 areas 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 AND DISPOSAL

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

CUNTAINER DISPUSAL:

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-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### INSTRUCTIONS:

EH-1415 Weed & Feed is a combination of four proven weed killers--2,4-D, mecoprop-p, dicamba and sulfentrazone. This herbicide controls a wide range of lawn weeds, including daridellor, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a x-x-x (grade percentage) fertilizer provides a supply of plant nutrients.

#### **USE PRECAUTIONS:**

Do not use on dichondra, carpetgrass, St. Augustinegrass, or turfgrass where desirable clovers are present.

Do not apply this product to newly seeded grasses until well-established or after the second or third mowing.

Do not use this product on flowers, vegetables, groundcovers, gardens or landscape plantings including shrubs and trees. Do not exceed specified dosage for any area.

This product will not prevent weed seeds from producing new plants.

#### HOW MUCH TO APPLY:

Apply 2.5 to 3.0 pounds of product per 1,000 square feet of turfgrass. A second application may be made in approximately 30 days.

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.

#### WHEN TO APPLY:

Apply when broadleaf weeds are actively growing in spring or early fall.

 Apply when the air is calm (Choose a calm day) to ensure uniform coverage and avoid spreading granules onto flowers, vegetables, and ornamental shrubbery.

Possible retreatment may be necessary if lawn is heavily overrun by weeds, if adverse low moisture conditions prevail, or if weeds are in a state of poor growth.

#### WHAT TO EXPECT:

- 1. Mow lawn to normal height 1 to 2 days before application.
- 2. Water lawn thoroughly at least 1 to 2 days before application to sustain moisture until the next watering (see step 5).
- 3. Apply when broadleaf weeds are young and actively growing, preferably in the morning when dew is on the grass. At the time of application, moisture on the weed leaves from dew, rainfall or irrigation/watering aids in control. If grass is not moist at time of application, sprinkle lightly with water.
- 4. Avoid applying when temperatures are consistently above 90°F.
- 5. Do not wash from weed leaves for 1 to 2 days after application. At this time, a thorough watering should be made.

#### DISTRIBUTION AND SPREADER PATTERNS:

Always apply with a properly calibrated rotary or drop type fertilizer spreader to distribute the granules evenly. Never apply by hand.

**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.

**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.

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Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
	2.5	5600
14	2.75	5100
	3.0	4700
ł		
Í		
	2.5	6000
15	2.75	5450
	3.0	5000
ļ		
	2.5	6400
16	2.75	5800
í (	3.0	5300
	2.5	6800
17	2.75	6200
	3.0	5700
f	2.5	7200
18	2.75	6500
	3.0	5400
1 C	· · · · · · · · · · · · · · · · · · ·	
<u> </u>		

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
	2.5	7600
	2.75	
19	3.0	6300
	2.5	8000
20	2.75	7200
	3.0	6700
<b></b>	2.5	10000
25 [	2.75	9000
l í	3.0	7500
	2.5	12000
30	2.75	11000
Γ Γ	3.0	10000
Ľ	· · · · · · · · · · · · · · · · · · ·	

#### SINGLE PASS DISTRIBUTION:

For best results, apply this product evenly and uniformly avoiding streaking, skips or overlaps.

- 1. For rotary spreaders, operate at intervals corresponding to the swath width. For drop spreaders, overlap the wheel tracks to ensure complete coverage.
- 2. First, spread the borders of your lawn and header strips for turning around. Then apply this product to the center with straight line passes
- 3. Walk at a steady pace to ensure even coverage. Close the spreader opening when turning to change directions or when stopping.

#### CALIBRATION INSTRUCTIONS AND SPREADER SETTINGS:

Calibrate the spreader according to the manufacturer's directions. Initial spreader settings may require adjustment to deliver the recommended rate under actual application conditions. To provide proper distribution, calibrate spreader before application.

- For 2.5 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 400 square feet and adjust to apply at the rate of 1 pound of product per 400 square feet.
- For 2.75 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 360 square feet and adjust to apply at the rate of 1 pound of product per 360 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.

	[	Delivers	lbs./1,0	000 sq. ft.
Spreader	2.5 lbs.	2.75 Ibs	3.0 lbs	
LESCO <sup>®</sup> Rotary	X	Х	X	
calibration gauge setting #				
Ortho <sup>®</sup> Drop (5000)	X	X	X	
Ortho® Rotary (6000)	X	X	X	
Precision <sup>®</sup> Red Devil <sup>®</sup> Rotary	X	X	X	
Quaker® Rotary	Х	Х	X	
Republic <sup>®</sup> EZ Drop	X	X	X	
Republic <sup>®</sup> EZ Grow	X	<u> </u>	X	
Republic <sup>®</sup> EZ Rotary	X	X	X	
Scotts <sup>®</sup> Drop (PF3)	X	X	X	
Scotts <sup>®</sup> Easy Green	X	X	X	
Scotts <sup>®</sup> Speedy Green	X	X	X	
True Temper Rotary	X	X	X	

Spreader settings for 1.0 pound of product per 330 square feet		
Scotts EasyGreen® Rotary	26	
Scotts Drop	5	
Scotts SpeedyGreen® Rotary	31⁄2	
GreenView Drop (Spred II)	4	
Central Drop (#205)	51⁄2	
Sears Drop (#19810)	4	
Ortho Drop (#5000)	5	
Precision Drop (Red Devil)	4	

#### Advisory For Fertilizers Containing Iron:

Keep this product off sidewalks, patios, driveways, etc. This fertilizer may contain 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.

#### 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."
- Information regarding the contents and levels of metals in this product is available on the internet at <a href="http://www.aapfco.org/metals.htm">http://www.aapfco.org/metals.htm</a>.

#### Referrals to other products used sequentially:

- For best results, apply (brand name) products.
- Apply using the 4-Step Program
- 4-Step Program:
  - STEP 1: Menards Premium Crabgrass Preventor Apply March early May Prevents crabgrass, foxtail, goosegrass, *poa annua* and other annual weed grasses. Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
  - STEP 2: Menards Premium Weed & Feed Apply May June Kills dandelion, clover, plantain and over XXX other broadleaf weeds. Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
  - STEP 3: Menards Premium Lawn Food Apply June August Nourishes your lawn throughout the summer months with extended feeding of Nitrogen. Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.
  - STEP 4: Menards Premium Winterizer & Weed Control Apply late August mid October Kills dandelion, clover, plantain and over XXX other broadleaf weeds. Maximizes root building. Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening.

OR

STEP 4: Menards Premium Starter & Winterizer - Apply late August - November - Maximizes root building. - Nutralene feeds your turfgrass for up to 2 months with long lasting deep greening. -Use with new seeding and sodding of turfgrass.

#### - BROADLEAF WEEDS -

Annual yellow sweetclover Aster Austrian fieldcress Bedstraw Beggarticks Betony, Florida Bindweed, field Bird vetch Bitter wintercress Bittercress, hairy Bitterweed Black-eyed Susan Black medic Black mustard Blackseed plantain Blessed thistle Bloodflower milkweed Blue lettuce Blue vervain Bracted plantain Bristly oxtongue Broadleaf dock Broadleaf plantain Broomweed Buckhorn Buckhorn plantain Bulbous buttercup Bull thistle Bullnettle Burclover Burdock Burning nettle Burweed Buttercup Buttonweed Canada thistle Carolina geranium Carpetweed Catchweed bedstraw Catnip Catsear Chickweed, common Chickweed, mouseear Chicory Cinquefoil Clover, crimson Clover, hop Clover, red Clover, strawberry Clover, sweet Clover, white

Cockle Cocklebur Common mullein Creeping jenny Cudweed Curly dock Daisy, English Daisy fleabane Daisy, oxeye Dandelion Dichondra Dogfennel Dollarweed False dandelion Falseflax False sunflower Fiddleneck Florida pusley Frenchweed Galinsoga Goldenrod Ground ivy Gumweed Hairy fleabane Hawkweed Healall Heartleaf drymary Heath aster Hedge bindweed Hedge mustard Henbit Hoary cress Hoary plantain Hoary vervain Horsenettle Jimsonweed Knawel Knotweed Kochia Lambsquarters Lespedeza Mallow Matchweed Mexicanweed Milk vetch Morningglory Mouseear hawkweed Mugwort Musk thistle

Mustard Narrowleaf plantain Narrowleaf vetch Nettle Orange hawkweed Oxalis Parsley-piert Parsnip Pearlwort Pennycress Pepperweed Pigweed Pineywoods bedstraw Plains coreopsis Plantain Poison ivy Poison oak Pokeweed Poorioe Prairie sunflower Prickly lettuce Prickly sida Prostrate knotweed Prostrate pigweed Prostrate spurge Prostrate vervain Puncturevine Purslane, common Ragweed Red sorrel Redroot pigweed Redstem filaree Rough cinquefoil Rough fleabane Russian pigweed Russian thistle Scarlet pimpernel Scotch thistle Sheep sorrel Shepherdspurse Slender plantain Smallflower galinsoga Smooth dock Smooth pigweed Sorrel Sowthistle Spanishneedles Speedwell

Spiny amaranth Spiny cocklebur Spiny sowthistle Spotted catsear Spotted spurge Spurweed Stinging nettle Strawberry, India mock Tall nettle Tall vervain Tansy ragwort Tansy mustard Thistle Trailing crownvetch Tumble mustard Tumble pigweed Velvetleaf Venice mallow Virginia buttonweed Virginia creeper Virginia pepperweed Wavyleaf bullthistle Western clematis Western salsify White mustard Wild aster Wild buckwheat Wild carrot Wild four-o'clock Wild garlic Wild geranium Wild lettuce Wild marigold Wild mustard Wild onion Wild parsnip Wild radish Wild rape Wild strawberry Wild sweet potato Wild vetch Woodsorrel Woolly croton Woolly morningglory Woolly plantain Wormseed Yarrow Yellow rocket Yellowflower pepperweed and other broadleal weeds

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#### LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED. THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

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### APPENDIX

#### I. Guaranteed Analysis:

GUARANTEED ANALYSIS XX-X-X	
Total Nitrogen (N)	XX%
x.x% urea nitrogen* Available Phosphate (P <sub>2</sub> O <sub>5</sub> )	X%
Soluble Potash (K <sub>2</sub> 0)	X%
Sulfur (S) x.x% free sulfur (S)	X%
Derived from: polymer-coated sulfur-coated urea, urea, ammonium phosphate, potassium ch *A portion of the urea has been coated to provide x.x% coated slow-release nitrogen.	loride.
This product and/or its manufacture is covered by one or more of the following U.S. pater international counterparts thereof: US Patent Numbers: xxxxxx	nts and

*Note:* Fertilizer grades with nutrient contents expressed as the percentages of N,  $P_2O_5$  and  $K_2O$  may include the following: 23-3-7 or x-x-x. The fertilizer grade analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.

#### II. State mandated rertilizer labeling requirements:

#### 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."
- Information regarding the contents and levels of metals in this product is available on the internet at <a href="http://www.aapfco.org/metals.htm">http://www.aapfco.org/metals.htm</a>.

#### I. Fertilizer Labeling Requirements in States:

- 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."
- <u>After July 1, 1999</u>, 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/."
- Information regarding the contents and levels of metals in this product is available on the Internet at <a href="http://www.xxxxx.com">http://www.xxxxx.com</a>.
- Typically a lawn 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 \_\_\_\_\_ pounds of
  nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer
  program suitable to your geographical region.

#### III. Fertilizer Grades:

Fertilizer grades with nutrient contents expressed as the percentages of N,  $P_2O_5$ , and  $K_2O$  include the following:

18-0-6	23-3-7	26-4-4	30-4-4
19-6-8			
22-3-3	25-3-3	26-4-6	32-3-3
22-3-6	25-4-8	28-0-3	32-4-8
22-3-17	26-3-6	29-3-4	24-4-8
22-4-11		30-3-3	

**IV. Advertising Claims** which may be used on the container labeling, advertising and promotional materials of subregistered products.

- Superior Broadleaf Weed Control in Cool Weather
- Controls Tough Broadleaf Weeds in Established Lawns
- Kills Over (number) Broadleaf Weeds
- Bag Treats Up To 7,600 Square Feet