

2217-890

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT 31 2008

James L. Kunstman
PBI/Gordon Corp.
1217 West 12th Street
P.O. Box 014090
Kansas City, MO 64101

Dear Dr. Kunstman:

Subject: RED Label Amendment: 2,4-D, Dicamba and MCPP-p
EH-1433 Weed & Feed
EPA Registration Number: 2217-890

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the changes below:

1. Per the acute toxicity review, the signal word currently on the label "CAUTION" must be revised to read "DANGER."
2. A Note to Physician must be added to the label and must read:

"Note to Physician
Probable mucosal damage may contraindicate the use of gastric lavage."

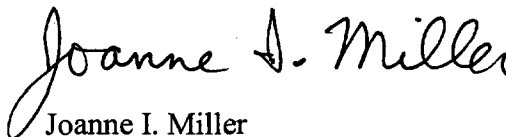
The Agency recommends that this Note to Physician also address eye irritation concerns.
3. Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

"DANGER
Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield), long-sleeved shirt, long pants, shoes and socks."
4. The text "A second application may be made in approximately 30 days" appearing on the bottom on Page 2 of the label must be revised to read "Apply a second application no sooner than 30 days from the previous application."

5. Under Storage and Disposal, change second bullet to "Pesticide Disposal".
6. Change statement under Limited Warranty and Disclaimer to read "To the extent consistent with applicable law, 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, to the extent consistent with applicable law, shall the manufacturer be liable for incidental, consequential, or special damages resulting from the use or handling of this product."
7. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,



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

Enclosure

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EH-1433 WEED & FEED

EPA Reg. No. 2217-890

ACTIVE INGREDIENT:

| | |
|---------------------------------|-----------------|
| 2,4-D, 2-ethylhexyl ester..... | 0.842% |
| Mecoprop-p acid..... | 0.127% |
| Dicamba acid..... | 0.054% |
| Sulfentrazone..... | 0.025% |
| OTHER INGREDIENTS: | 98.952% |
| TOTAL | 100.000% |

THIS PRODUCT CONTAINS:

- 11.18 lb. 2,4-dichlorophenoxyacetic acid equivalent per ton or 0.559%. CAS 1928-43-4.
- 2.54 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.127%. CAS 16484-77-8.
- 1.08 lb. 3,6-dichloro-o-anisic acid equivalent per ton or 0.054%. CAS 1918-00-9.
- 0.50 lb. N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]methanesulfonamide per ton or 0.025%. CAS 122836-35-5.

Isomer Specific by AOAC Methods

TRIMEC® is a registered trademark of PBI/Gordon Corporation.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 31 2008

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

2217-890

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. Wear long-sleeved shirt and long pants, shoes plus socks and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

| | |
|--|--|
| First Aid | |
| If in eyes: | <ul style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice. |
| If swallowed: | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment information. | |



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Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

This chemical has properties and characteristics associated with chemicals detected 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.

DIRECTIONS FOR USE

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

General Precautions and Restrictions:

Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until dusts have 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.

INSTRUCTIONS:

EH-1433 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 dandelion, 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, 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.

Do not use this product on or near desirable plants, including within the drip line of the roots of desirable trees and shrubs, since injury may result.

Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, St. Augustinegrass and zoysiagrass:

Apply 3.0 to 3.6 pounds of product per 1,000 square feet of turfgrass. A second application may be made in approximately 30 days.

Do not apply more than 3.6 pounds of product per 1000 square feet of turfgrass per application. If necessary, a second application may be made no sooner than 30 days after the first. Do not apply more than 7.2 pounds of product per 1000 square feet per year. [note to reviewer: the following information may be omitted from the final printed label: 3.6 pounds of this product contains 0.88 lbs 2,4-D (ae), 0.20 lbs mecoprop-p (ae), and 0.08 lbs dicamba (ae).]

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

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.]

| Bag Size, Lbs. | Application Rate, Lbs./1,000 Sq.Ft. | Treated Area for This Bag Size, Sq.Ft. | Bag Size, Lbs. | Application Rate, Lbs./1,000 Sq.Ft. | Treated Area for This Bag Size, Sq.Ft. |
|----------------|-------------------------------------|--|----------------|-------------------------------------|--|
| 14 | 3.0 | 4700 | 19 | 3.0 | 6300 |
| | 3.5 | 4000 | | 3.5 | 5400 |
| | 3.6 | 3900 | | 3.6 | 5300 |
| 15 | 3.0 | 5000 | 20 | 3.0 | 6700 |
| | 3.5 | 4300 | | 3.5 | 5700 |
| | 3.6 | 4200 | | 3.6 | 5600 |
| 16 | 3.0 | 5300 | 25 | 3.0 | 7500 |
| | 3.5 | 4600 | | 3.5 | 7100 |
| | 3.6 | 4400 | | 3.6 | 6900 |
| 17 | 3.0 | 5700 | 30 | 3.0 | 10000 |
| | 3.5 | 4900 | | 3.5 | 8600 |
| | 3.6 | 4700 | | 3.6 | 8300 |

| Bag Size, Lbs. | Application Rate, Lbs./1,000 Sq.Ft. | Treated Area for This Bag Size, Sq.Ft. | Bag Size, Lbs. | Application Rate, Lbs./1,000 Sq.Ft. | Treated Area for This Bag Size, Sq.Ft. |
|----------------|-------------------------------------|--|----------------|-------------------------------------|--|
| 18 | 3.0 | 5400 | | | |
| | 3.5 | 5100 | | | |
| | 3.6 | 5000 | | | |

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 3.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 333 square feet and adjust to apply at the rate of 1 pound of product per 333 square feet.
- For 3.5 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 285 square feet and adjust to apply at the rate of 1 pound of product per 285 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.

| Spreader | Delivers ___ lbs./1,000 sq. ft. | | |
|---|---------------------------------|---------|---------|
| | 3.0 lbs | 3.5 lbs | 3.6 lbs |
| LESCO® Rotary calibration gauge setting # | X | X | X |
| Ortho® Drop (5000) | X | X | X |
| Ortho® Rotary (6000) | X | X | X |
| Precision® Red Devil® Rotary | X | X | X |
| Quaker® Rotary | X | X | X |
| Republic® EZ Drop | X | X | X |
| Republic® EZ Grow | X | X | X |
| Republic® EZ Rotary | X | X | X |
| Scotts® Drop (PF3) | X | X | X |
| Scotts® Easy Green | X | X | X |
| Scotts® Speedy Green | X | X | X |
| True Temper Rotary | X | X | X |

OR

| Spreader settings for 1.0 pound of product per 285 square feet | |
|--|-----|
| Scotts EasyGreen® Rotary..... | 26 |
| Scotts Drop..... | 5 |
| Scotts SpeedyGreen® Rotary..... | 3.5 |
| GreenView Drop (Spred II)..... | 4 |
| Central Drop (#205)..... | 5.5 |
| 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 by Association of American Plant Food Control Officials (AAPFCO):

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metal.htm>.

OR

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.regulatory-info-xx.com>

Each registrant shall substitute a unique alphanumeric identifier for "xx". This statement may be used only if the licensee establishes and maintains the Internet site: there is a clearly visible, direct hyperlink to a government website; and the Internet site contains no advertising or company specific information

| BROADLEAF WEEDS | | | |
|---------------------------|-------------------|-----------------------|--|
| Annual yellow sweetclover | Clover, white | Musk thistle | Spiny amaranth |
| Aster | Cockle | Mustard | Spiny cocklebur |
| Austrian fieldcress | Cocklebur | Narrowleaf plantain | Spiny sowthistle |
| Bedstraw | Common mullein | Narrowleaf vetch | Spotted catsear |
| Beggarticks | Creeping jenny | Nettle | Spotted spurge |
| Betony, Florida | Cudweed | Orange hawkweed | Spurweed |
| Bindweed, field | Curly dock | Oxalis | Stinging nettle |
| Bird vetch | Daisy, English | Parsley-piert | Strawberry, India mock |
| Bitter wintercress | Daisy fleabane | Parsnip | Tall nettle |
| Bittercress, hairy | Daisy, oxeye | Pearlwort | Tall vervain |
| Bitterweed | Dandelion | Pennycress | Tansy ragwort |
| Black-eyed Susan | Dichondra | Pepperweed | Tansy mustard |
| Black medic | Dogfennel | Pigweed | Thistle |
| Black mustard | Dollarweed | Pineywoods bedstraw | Trailing crownvetch |
| Blackseed plantain | False dandelion | Plains coreopsis | Tumble mustard |
| Blessed thistle | Falseflax | Plantain | Tumble pigweed |
| Bloodflower milkweed | False sunflower | Poison ivy | Velvetleaf |
| Blue lettuce | Fiddleneck | Poison oak | Venice mallow |
| Blue vervain | Florida pusley | Pokeweed | Virginia buttonweed |
| Bracted plantain | Frenchweed | Poorjoe | Virginia creeper |
| Bristly oxtongue | Galinsoga | Prairie sunflower | Virginia pepperweed |
| Broadleaf dock | Goldenrod | Prickly lettuce | Wavyleaf bullthistle |
| Broadleaf plantain | Ground ivy | Prickly sida | Western clematis |
| Broomweed | Gumweed | Prostrate knotweed | Western salsify |
| Buckhorn | Hairy fleabane | Prostrate pigweed | White mustard |
| Buckhorn plantain | Hawkweed | Prostrate spurge | Wild aster |
| Bulbous buttercup | Healall | Prostrate vervain | Wild buckwheat |
| Bull thistle | Heartleaf drymary | Puncturevine | Wild carrot |
| Bullnettle | Heathaster | Purslane, common | Wild four-o'clock |
| Burclover | Hedge bindweed | Ragweed | Wild garlic |
| Burdock | Hedge mustard | Red sorrel | Wild geranium |
| Burning nettle | Henbit | Redroot pigweed | Wild lettuce |
| Burweed | Hoary cress | Redstem filaree | Wild marigold |
| Buttercup | Hoary plantain | Rough cinquefoil | Wild mustard |
| Buttonweed | Hoary vervain | Rough fleabane | Wild onion |
| Canada thistle | Horsenettle | Russian pigweed | Wild parsnip |
| Carolina geranium | Jimsonweed | Russian thistle | Wild radish |
| Carpetweed | Knawel | Scarlet pimpernel | Wild rape |
| Catchweed bedstraw | Knotweed | Scotch thistle | Wild strawberry |
| Catnip | Kochia | Sheep sorrel | Wild sweet potato |
| Catsear | Lambsquarters | Shepherdspurse | Wild vetch |
| Chickweed, common | Lespedeza | Slender plantain | Woodsorrel |
| Chickweed, mouseear | Mallow | Smallflower galinsoga | Woolly croton |
| Chicory | Matchweed | Smooth dock | Woolly morningglory |
| Cinquefoil | Mexicanweed | Smooth pigweed | Woolly plantain |
| Clover, crimson | Milk vetch | Sorrel | Wormseed |
| Clover, hop | Morningglory | Sowthistle | Yarrow |
| Clover, red | Mouseear hawkweed | Spanishneedles | Yellow rocket |
| Clover, strawberry | Mugwort | Speedwell | Yellowflower pepperweed and other broadleaf weeds |
| Clover, sweet | | | |

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: **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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

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.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Weight _____
- EPA Est. No. _____
- Note: The Guaranteed Analysis and other required fertilizer statements may be presented on the front panel of the container label. A sample Guaranteed Analysis and related statements are presented in the Appendix of this labeling.

2. Guaranteed Analysis:

| GUARANTEED ANALYSIS XX-X-X | |
|---|-----|
| Total Nitrogen (N)..... | XX% |
| x.x% ammoniacal nitrogen | |
| x.x% urea nitrogen* | |
| Available Phosphate (P2O5)..... | X% |
| Soluble Potash (K2O)..... | X% |
| Sulfur (S)..... | X% |
| x.x% free sulfur (S) | |
| Derived from: polymer-coated sulfur-coated urea, urea, ammonium phosphate, potassium chloride. *A portion of the urea has been coated to provide x.x% coated slow-release nitrogen. This product and/or its manufacture is covered by one or more of the following U.S. patents and international counterparts thereof: US Patent Numbers: xxxxxx | |

Note: Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5 and K2O 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.

3. State fertilizer labeling requirements:

Fertilizer Labeling Requirements by Association of American Plant Food Control Officials (AAPFCO):

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metal.htm>.

OR

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.regulatory-info-xx.com>

Each registrant shall substitute a unique alphanumeric identifier for "xx". This statement may be used only if the licensee establishes and maintains the Internet site: there is a clearly visible, direct hyperlink to a government website; and the Internet site contains no advertising or company specific information

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.

4. Fertilizer Grades:

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

| | | | |
|---------|--------|--------|--------|
| 19-6-8 | 23-3-7 | 26-4-4 | 30-4-4 |
| 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 | |

5. Alternate optional maximum rate statement:

The maximum broadcast application rate is 3.6 pounds of product per 1,000 sq.ft. per application (0.88 lbs 2,4-D ae, 0.20 lb MCP-P ae and 0.08 dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 7.2 pounds of product per 1,000 sq.ft. (1.75 lbs 2,4-D ae, 0.40 lb MCP-P ae and 0.17 lb dicamba ae per acre).

DOCUMENT CONTROL INFORMATION

- 1. **Unique Label Identifier:** 002217-00890.20080305.doc
- 2. **Previous Version:** AP102805
- 3. **Reason for Issue:** Various changes pertaining to re-registration. Re-format label.