



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. H.R. McLane
H.R. McLane, Inc.
7210 Red Road, Suite 206
Miami, FL 33143-5321

NOV 28 2000

Dear Mr. McLane:

SUBJECT: 8-Month Response to the Trifluralin RED
SHAW'S 18-5-9 TURF FOOD WITH XL
CRABGRASS CONTROL
EPA Registration Number: 8378-20
Your Application Submission Dated April 20, 1997,
Resubmission (Revised Labeling) Dated April 6, 2000

The revised labeling for the subject product, referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. There are typographical errors on your product labeling. Please make the following revisions:
 - i. Under the heading entitled "**TO RESEED TREATED AREAS**," revise the sentence "When Reseeding it msy be..." to read as "When Reseeding it may be...."
 - ii. Under the heading entitled "**SPREADER SETTINGS**," revise the word "nor" in the third sentence to read as "not".

A stamped copy of the labeling is enclosed for your records. Please submit (1) one copy of your final printed labeling before you release the product for shipment.

EPA has determined that you have fulfilled the labeling and product specific data requirements of the trifluralin RED. However, we cannot reregister this product at this time for the following reason:

- The subject product is registered with (2) two active ingredients: trifluralin and benefin.

The Agency does not have sufficient information to make a reregistration eligibility decision on benefin. Once the required data have been reviewed by the Agency, EPA will make a reregistration eligibility decision for benefin.

If you have any questions or concerns regarding this letter, please contact Marcel Howard at (703)305-6784.

Sincerely yours,

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

Enclosure

... Call a poison control center or doctor immediately for treatment information. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told by a poison control center or doctor. **IF IN EYES** - Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice. **IF ON SKIN** - Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Wash with plenty of soap and water. Get medical attention. Call a poison control center or doctor for treatment advice. **IF INHALED**: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice. **NOTE TO PHYSICIAN**: Probable mucosal damage may contraindicate the use of gastric lavage. Take product bag or label with you when calling or going to poison control center, or doctor.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Do not get in eyes. Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic skin reactions in some individuals.

Personal Protective Equipment

Users should wear protective clothing such as long pants, long-sleeved shirt, shoes and socks and waterproof gloves. Wear protective eyewear; (goggles, face shield, or safety glasses).

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to freshwater marine and estuarine fish and aquatic invertebrates including shrimp and oysters. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean highwater mark. Do not apply in a manner that will directly expose canals, lakes, streams, ponds, marshes, or estuaries to aerial drift. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Not for use on turf being grown for sale or other commercial use, as sod, or for commercial seed production, or for research purposes.

Entry Restrictions

Do not allow people or pets to enter the treated area until dusts have settled. If watering is required after the application do not enter or allow others to enter the treated areas (except those involved in the watering) until the watering is complete and the surface is dry. 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.

User Safety recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. See Personal Protective Equipment.

CAN BE USED ON THE FOLLOWING ESTABLISHED TURFGRASSES

When applied according to these directions this product can be used safely on the following turfgrass varieties: PERENNIAL BLUEGRASS VARIETIES, PERENNIAL RYE-GRASS VARIETIES, BERMUDAGRASS, BAHIA GRASS, CENTEPEDEGRASS, FESCUE VARIETIES, ST. AUGUSTINE GRASS, and ZOYSIAGRASS turfgrasses and other ornamental turf. Will not harm most ornamental trees; shrubs when used as directed.

WILL CONTROL THE FOLLOWING GRASSY WEEDS

This product contains a combination of Benefin and Trifluralin preemergence Herbicides plus a Lawn Food. It should be applied to established turf for the control of CRABGRASS (Smooth and Hairy), GOOSEGRASS (Silver Crab or Crowfoot), BARNYARDGRASS (Watergrass), FOXTAIL (Green and Yellow), and ANNUAL BLUEGRASS (Poa Annua) while providing fertilizer nutrients to the lawn.

SEE "WHEN TO APPLY" CHART FOR APPROPRIATE TIMES TO APPLY

Apply to turf 1 to 2 weeks prior to germination of weed seeds since established weeds will not be controlled. Apply only to healthy established turfgrass lawns.

IMPORTANT PRECAUTIONS IN USING THIS PRODUCT

- DO NOT apply in the spring to Bermuda Grass which has been overseeded with winter grasses (annual rye) since thinning will occur.
- DO NOT do not use on Dichondra, nor to newly sprigged areas of Bermudagrass, St. Augustine Grass or Centipede Grass, nor to Bentgrass or putting greens until these turfs are well established.
- DO NOT apply in spring to Turfgrass planted the previous fall. This product may thin established Annual Bluegrass (Poa Annua) & Fine-Leaved Fescue lawns when used at higher rates than 163 lbs. per acre. (1.5 lb. A.I. per Acre) Do not overdose.

FOR BEST RESULTS APPLY AT THE PROPER TIME

Successful preemergence control of the annual grassy weeds as listed requires proper application time. It must be applied 1 to 2 weeks prior to the germination of the weed seeds. All summer annual weeds do not germinate at the same time. For this reason application timing must coincide with the normal germination period of any one of the annual grassy weeds. If not, poor and erratic weed control will result due to improper application.

WATER THE TREATED AREA AFTER APPLICATION:

Best results will be obtained if treated areas are irrigated with 1/4 to 1/2 inch water soon after application. Any cultural practices that disturb the soil such as verticutting, should be done prior to application of this product. (If chart is used with labeling) Add-["Refer to

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE**: Store product in its closed original container only. In case of leak or spill, contain material, and while wearing a dust mask and gloves, sweep up, and use in accordance with product directions or dispose of, as wastes. **PESTICIDE DISPOSAL**: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL**: Completely empty bag into application 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. **HOUSEHOLD**: Do not reuse empty bag. Wrap and put in trash.

NET WEIGHT 50 LBS.....Covers up to 13,300 Sq.ft.

KNOX FERTILIZER COMPANY, INC.

P.O. Box 248 - KNOX, INDIANA 46534 U.S.A.

lawn maintenance program.

A. Southern Turf use 50 lbs. to treat 6,700 to 10,000 sq.ft. For Southern warm season turfgrass - For preemergence control apply 220 to 325 lbs. per acre (equal to 2 to 3 lbs. Active Ingredient per acre), in the late winter or early spring one to two weeks prior to the onset of conditions favorable for annual weedy grass seed germination. One 50 lb. bag will cover 6,700 to 10,000 sq.ft. Use for 6,700 sq.ft. where turf is completely overrun by weeds. Use for 10,000 sq.ft. when weeds are sparse or the turf is in a yearly crabgrass control program.

"LATE SPRING-EARLY SUMMER GERMINATING" ANNUAL GOOSEGRASS (SILVER CRAB)

Although classified as a summer annual grass, Goosegrass normally germinates 4 to 6 weeks later than the crabgrass, foxtails and other summer annual grass species. Applications of this product should therefore, be timed accordingly.

A. Northern Turf use 50 lbs. to treat 10,000 sq.ft. For Northern cool season turfgrasses - For preemergence control apply 220 lbs/acre (equal to 2 lbs. Active Ingredient per acre) of this product in late spring or early summer one to two weeks prior to the expected germination period of goosegrass.

B. Southern Turf use 50 lbs. to treat 6,700 to 10,000 sq.ft. For Southern warm season turfgrasses - For preemergence control, apply 220 to 325 lbs. per acre (equal to 2 to 3 lbs. Active Ingredient per acre) of this product in late spring or early summer one to two weeks, prior to the expected germination of goosegrass. Use for 6,700 sq.ft. where turf is completely overrun by weeds. Use for 10,000 sq.ft. where weeds are sparse and the area is in a yearly lawn maintenance program.

APPLY TWICE FOR FULL SEASON CONTROL

In areas where preemergence control of both early germinating annual grasses (Crabgrass, Foxtail, and Barnyardgrass) and the later germinating Goosegrass is desired, two application of this product at the recommended rate, spaced 8 to 10 weeks apart may be made to provide full season control of these annual grass species.

POA ANNUA (ANNUAL BLUEGRASS) CONTROL

In areas of heavy infestation of Annual Bluegrass, its elimination will leave areas of thin turf. Employ proper cultural practices to establish a new turf.

A. Northern cool season turfgrasses -For preemergence control apply 220 lbs. per acre (equal to 2 lbs. Active Ingredient per acre) of this product per acre in late summer or early fall and again in late winter or spring one to two weeks prior to expected germination of annual bluegrass. One 50 lb. bag will treat 10,000 sq.ft. of turfgrass.

B. Southern warm season turfgrasses -For preemergence control apply 325 lbs. per acre (equal to 3 lbs. Active Ingredient per acre) of this product per acre in the later summer or early fall one to two weeks prior to expected germination of poa annua. In southern areas where germination continues for extended periods of time a second application at 325 lbs. per acre can be made 6 to 8 weeks after the initial treatment. One 50 lb. bag will treat and feed 6,700 sq.ft. of turfgrass.

TO RESEED TREATED AREAS

- Delay reseeding - 6 weeks when applying at the rate of 163 to 220 lbs./acre equal to 1.5 to 2.0 lbs. Active Ingredient / acre. or when using one 50 lb. bag to cover 10,000 to 13,300 sq.ft.
- Delay reseeding - 12 to 16 weeks when applying at rate of 325 lbs./acre equal to 3.0 lbs. of Active Ingredient per acre or when using one 50 lb. to cover 6,700 sq.ft. When Reseeding it may be wise to increase the amount of seed put down; by 10%.

SPREADER SETTINGS

The following spreader settings are for use with new equipment. Old spreaders may need recalibrating. Proper application is based on equipment condition with regard to age and use, also your walking speed and unevenness of the terrain. Do not overlap coverage. Poor control or turf damage can result from uneven or improper application.

Spreader	50# bag per sq. ft.	Northern Lawns		Southern Lawns	
		Crabgrass etc.	Poa Annua	Crabgrass etc.	Poa Annua
SCOTT #35	13,300 "	xx	-	xx	-
	10,000 "	x	xxx	x	xxx
	6,700 "	-	x.x	xx xx	xx.x
CYCLONE "B1"	13,300 "	x	-	x	-
	10,000 "	x	x	x	x
	6,700 "	xx	xx	xx	xx
50 lbs. to treat 13,300 sq.ft. = 163 lbs./acre		= 1.50 lbs. A.I./acre			
50 lbs. to treat 10,000 sq.ft. = 220 lbs./acre		= 2.00 lbs. A.I./acre			
50 lbs. to treat 6,700 sq.ft. = 325 lbs./acre		= 3.00 lbs. A.I./acre			

GUARANTEED FERTILIZER ANALYSIS

Nitrogen - - - - - xx% *Primary Plant Food derived from Ammoniacal (N)..... xx.x % Urea, Sulfur Coated Urea, Muriate Urea (N).....xx.x% of Potash, Ammoniated Phosphate.*
 Sulfur Coated Urea (N).....x.x%
 Phosphoric Acid (P₂O₅) - - - x% *Potential Acidity x,xxx lbs.*
 Soluble Potash (K₂O) - - - x% *Calcium Carbonate per ton.*

***WHEN TO APPLY**

*Approximate "times of the year" when crabgrass etc. weed seeds germinate.

	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.
NORTHERN TURF				1.////	2.////	3.////						
SOUTHERN TURF							4.////	5.////				

Soil moisture % & temperature degrees will change germination periods each year

- For Crabgrass, Foxtail, Barnyardgrass in Northern Turf.
- For Goosegrass - Northern Turf
- For Poa Annua in Northern Turf.
- For Crabgrass, Foxtail and Barnyardgrass in Southern Turf.
- For Goosegrass - Southern Turf.
- For Poa Annua in Southern Turf

**Two applications may be needed during this period to give adequate control. *Apply 1 to 2 weeks before weed seed germinate in your locale. Two applications per year are usually required to control weeds when germination periods are extended.

NOTICE: Buyer and user assumes all risk and liability of use, storage and/or handling of this product not in accordance with the terms of this label.(#378-20.p65104-06-00)

ACCEPTED
with COMMENTS
In EPA Letter Dated
NOV 28 2000

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.**
8378-20