

JUL 14 2003

Robert F. Bischoff, Agent
Total Turf Consulting LLC
P.O. Box 7928
Hilton Head Island, SC 29938

Dear Mr. Bischoff:

Subject: Conversion from 2,4-DP and MCP P to 2,4-DP-p and MCP P-p
Shaw's Premium Weed & Feed Formula 2
EPA Registration Number: 8378-24
Your Submission Dated February 20, 2003

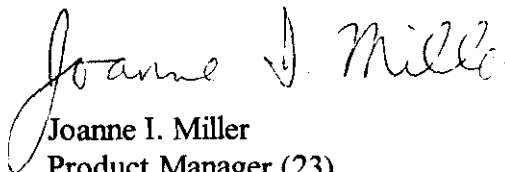
The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredients, dichlorprop and mecoprop, from their racemic forms [2-(2,4-dichlorophenoxy) propionic acid and 2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salts thereof] to their single isomer forms [(+)-R-2-(2,4-dichlorophenoxy) propionic acid and (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salts 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 forms of dichlorprop and mecoprop, or applicable salts thereof, 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 Formulation, dated February 20, 2003 have been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

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

Shaw's Premium Weed & Feed "Formula 2"

Treats XX sq. ft.

This product is a premium grade herbicide and turf food combination which controls a wide spectrum of broadleaf weeds while providing both fast and long lasting action. It may be used on Bluegrass, Fescue, Rye, Bermuda, Bahia, Zoysia and St. Augustinegrass lawns.

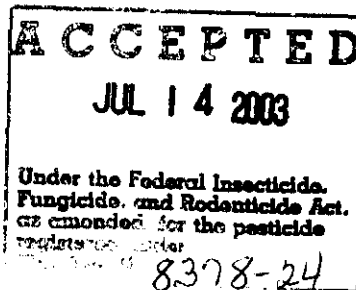
ACTIVE INGREDIENTS:

- *Dimethylamine Salt of
2,4-Dichlorophenoxyacetic acid 0.425%
- **†Dimethylamine Salt of (+)-R-2-(2-Methyl-4-chlorophenoxy) propionic acid 0.213%
- ***†Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy) propionic acid 0.210%

INERT INGREDIENTS: 99.152%

TOTAL 100.00%

EPA Reg. No. 8378-24 EPA Est. No. 8378-IN-1



Isomer Specific AOAC Method No. 6.321 Equivalent to:

- *0.35% of 2,4-Dichlorophenoxyacetic Acid
- **0.175% of (+)-R-2-(2-Methyl-4-Chlorophenoxy) propionic acid
- ***0.175% of (+)-R-2-(2,4-Dichlorophenoxy) propionic acid

†CONTAINS THE SINGLE ISOMER FORMS OF MECOPROP-p AND DICHLORPROP-p.

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

IF SWALLOWED: 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 by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 to 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 OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. 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 mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice. Have this product container or label with you when calling a poison control center or doctor or when going for treatment.

You may also call 1-800-858-7378 for emergency medical treatment advice. See side panel for additional Precautionary Statements.

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid inhalation of dust and contact with eyes, skin or clothing. When using this product, wear long pants, long-sleeved shirt, socks and shoes. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Do not allow people (other than applicator) or pets on treatment area during application.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. 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.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container in a dry, cool, secured area. Do not contaminate water, foodstuffs, feed, or seed by storage or disposal.

PRODUCT DISPOSAL: As a responsible environmental practice, where possible, it is recommended that all of the contents of the bag be used, carefully following label directions and precautions.

IF EMPTY: Do not reuse this bag. Place in trash or offer for recycling if available.

IF PARTLY FILLED: Call your local waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

SPELL: In case of spill, sweep up and dispose of material according to PRODUCT DISPOSAL directions listed above.

GENERAL INFORMATION

This product is a stable mixture of three phenoxy herbicides. Weeds contacted by this product gradually die, and disappear from the lawn. It is for use on Lawns, Ornamental Turf (not pastures), Golf Fairways, Aprons, Tees and Roughs. This product is a remarkably effective lawn fertilizer which combines both fast and long-lasting feeding action plus effective weed control. This product may be used on Bluegrass, Fescue, Rye, Bermuda, Bahia, Zoysia, and St. Augustinegrass lawns. DO NOT USE on Dichondra and Carpetgrass. DO NOT USE this product where desirable clovers are present or allow this product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

WEEDS CONTROLLED

This product was designed for control of broadleaf weeds in lawns such as: Black Medic, Buckhorn, Burdock, Chickory, Chickweed, Clover, Dock, Dandelion, English Daisy, Ground Ivy, Heal-All, Knotweed, Lambsquarter, Mallow, Morning Glory, Pigweed, Plantain, Poison Ivy, Poison Oak, Purslane, Ragweed, Red Clover, Red Sorrel, Stitchwort, Speedwell, Spurge, White Clover, Wild Carrot, Wild Onion, Wild Lettuce, Wild Garlic, Yarrow and other similar broadleaf weeds.

WHEN TO APPLY

Best results are obtained when weeds are growing rapidly in spring or early fall. **IMPORTANT:** Apply when grass is moist (after a rain, sprinkling or dew). For most effective broadleaf killing action, avoid unnecessary disturbances, including water, on treated areas for 48 hours after application. Watering will wash off weed killing material. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawns until after 3 mowings.

HOW TO APPLY

The maximum rate to turf is 2 pounds of 2,4-D acid equivalent per acre per application per site. The number of broadcast applications per treatment site is 2 per year. Apply evenly with a lawn spreader either as one pass application or a two pass application, criss-crossing the area using a half rate each time. Lawns that are heavily over-run with weeds and are in poor condition may require more than one application of this product. A suggested second application should be made in approximately 30 days.

SPREADER SETTINGS

The following settings are approximate for applying contents of this package. Settings are based on average walking speed. Reduce setting for slower speed and raise setting for higher speed.

Cyclone xx-xx K-Mart xx-xx
 Scotts xx-xx Montgomery Wards xx-xx
 Central xx-xx

These settings are approximate. Check your spreader on 250 sq. ft. and adjust at the rate of 0.8 pound per 250 sq. ft. Clean spreader thoroughly after each use.

GUARANTEED FERTILIZER ANALYSIS

TOTAL NITROGEN(N) XX%
AVAILABLE PHOSPHATE(P2O5) XX%
SOLUBLE POTASH (K2O) XX%

Primary plant foods derived from: urea, ammoniated phosphate and muriate of potash.

NOTICE: Buyer and user assumes all risk and liability of use, storage and/or handling of this material not in accordance with the terms of this label.

NET WEIGHT XX POUNDS
KNOX FERTILIZER COMPANY, INC.
P.O. BOX 248
KNOX, IN 46534