

SEP 11 2003

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

Dear Mr. Bischoff:

SUBJECT: Conversion From MCPP to MCPP-p
Shaw's Premium Weed & Feed 25-3-3 Lawn Food
EPA Registration Number: 8378-29 ✓
Your Submission Dated February 27, 2003

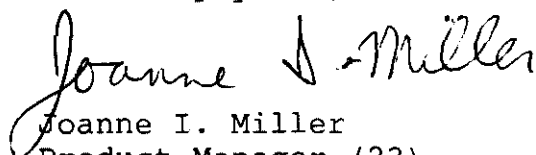
The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop 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 February 272003 has 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

A C C E P T E D

SEP 11 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 1378-29

SHAW'S PREMIUM WEED & FEED

With 25-3-3 Lawn Food

Treats 5,000 sq. ft.

A double action herbicide 2,4-D + MCPP with 25-3-3 Lawn Food
 For use in control of broadleaf weeds in home lawns, apartment and condominium turf, in parks, playgrounds and other ornamental & recreational turfgrass.
 Controls: Dandelions, Chickweed, Knotweed and many other weeds as listed
 For use on Bluegrass, Rye Grass, Fescue varieties, Zoysiagrass, Bahiagrass & Bermudagrass

ACTIVE INGREDIENTS:

*Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid	0.78%
**Dimethylamine Salt of (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid†	0.43%
INERT INGREDIENTS:	<u>98.79%</u>
TOTAL	100.00%

Isomer Specific AOAC Method No. 6.321, Equivalent to:

- *0.63% 2,4-Dichlorophenoxyacetic acid
- **0.35% (+)-R-2-(2-methyl-4-chlorophenoxy propionic acid)

CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-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 the first 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.

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

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: 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. Do not enter treatment areas until dust has settled.

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. Do not contaminate water when disposing of equipment wash waters. Clover, Dichondra and certain grasses such as Bermudagrass, St. Augustine or Carpetgrass are sensitive to herbicides and may be injured by the use of this product. Avoid treating and/or the drifting of granules to nearby flowers or other desirable plants.

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 cool, dry, 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 re-use 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.

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

WEEDS CONTROLLED

A partial list of weeds controlled - Bindweed, Black medic, Blue Lettuce, Buckhorn, Burdock, Canada Thistle, Chickweed, Clover, Cocklebur, Croton, Curly Dock, Dandelion, Dock, English Daisy, Fleabane, Florida Pusley, Ground Ivy, Heal-All, Henbit, Knotweed, Kochia, Lambsquarter, Lettuce, Mallow, Morning-Glory, Pennywort, Peppergrass, Pigweed, Plantain, Poison Ivy, Poison Oak, Poverty Weed, Purslane, Sheep Sorrel, Shepherdspurse, Smartweed, Spotted Spurge, Thistle, Vervain, Vetch, Wild Onion and many more broadleaf weeds.

This product contains a complete lawn food which supplies the turf with nitrogen. It is combined with two herbicides, 2,4-D & MCPP, which give double action broadleaf weed control while feeding the lawn.

WHERE TO USE

This product may be used on all varieties of Bluegrass, Perennial and Annual Varieties of Rye, Rough and Fine leafed Fescues, Zoysiagrass, Bermudagrass and Bahiagrass.

DO NOT USE on St. Augustinegrass, Carpetgrass, Bentgrass or Dichondra. It should not be used where desirable clovers are present. Apply at a time when the air is calm. Do not use on newly seeded lawns until after the second cutting. After application delay seeding for at least three weeks and increase the rate of seed put down by 25%.

WHEN TO USE

Apply when weeds are young and actively growing the spring, summer, or fall. Best results will be obtained when temperatures range from 65 to 90 degrees F. and the turf is in a vigorous state of growth from rain and/or watering. Results will be erratic if applied during drought periods. Apply when the air is calm. Lawns that are heavily over run by hard-to-kill weeds and appear low in vitality will benefit from an additional treatment in 30 to 45 days.

HOW TO USE

The maximum rate to turf is 0.99 pounds of 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year. Select an appropriate spreader and distribute the contents of this bag over 5,000 sq. ft. (18 lbs./5,000 sq. ft.) of turf for control of the many weeds as listed and to supply the lawn with a complete fertilization at the same time.

HOW TO MAKE SURE YOUR SPREADER IS OPERATING CORRECTLY

Using a Scott Spreader for Broadleaf Weeds place 1.8 lbs. (1 lb. + 13 oz.) granules in your spreader using No. 5 setting and apply to 500 sq. ft. with a 20 inch spreader this will equal 3 spreader widths wide (3 passes) by 100 feet long. If you run out before you cover the pre-measured area close the spreader setting $\frac{1}{2}$ the number. If you have granules left over, open (increase) the setting by $\frac{1}{2}$ the number. For further help refer to your Spreader Guide book.

POOR WEED CONTROL WILL RESULT IF YOUR SPREADER APPLIES LESS PRODUCT THAN RECOMMENDED. MAKE SURE TO APPLY THE TOTAL POUNDS PER SQUARE FEET AS SHOWN IN THE CHART.

SPREADER SETTINGS

APPLY 19 LBS. PER 5,000 SQ. FT.

Scott #5

Cyclone #4

When using a 36 lb. bag; spreader settings will be the same as for the 18 lb. bag but it will treat twice as much Sq. Ft. These settings are based on a "One time over" application with a "new" spreader.

GUARANTEED FERTILIZER ANALYSIS	
TOTAL NITROGEN(N)	25%
1.20% ammoniated nitrogen	
23.80% urea (N)	
AVAILABLE PHOSPHATE (P2O5)	3%
SOLUBLE POTASH (K2O)	3%
Derived from Urea, Ammoniated Phosphate, Muriate of Potash.	
Potential acidity = 956 lbs. Calcium Carbonate per ton.	

EPA REG. NO. 8378-29

EPA EST. NO. 8378-IN-1

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.

KNOX FERTILIZER COMPANY, INC.
P.O. BOX 248
KNOX, IN 46534
NET WEIGHT 18 POUNDS