UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Dawn L. Walters The Andersons, Inc. P.O. Box 119 Maumee, Ohio 43537

MAY 1 8 2004

Dear Ms. Walters:

SUBJECT:

Label Amendments - Homeowner and Commercial

Andersons Weed & Feed XX-XX-XX EPA Registration No. 9198-46

Your Submission Dated January 29, 2004

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

 As instructed in the Agency's March 22, 1995 letter, we required the groundwater contamination statement on the commercial labeling be revised. However, this proposed labeling does not have all of the Agency's revisions. Rewrite the groundwater contamination statement on the commercial labeling to read as follows;

#Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing /loading equipment on an impervious pad to contain spills will help prevent groundwter contamination.#

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

Sincerely yours,

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

Enclosure

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5/18/04				

## ANDERSONS WEED AND FEED XX-XX-XX

ACTIVE INGREDIENTS: Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid* Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy) p INERT INGREDIENTS:	ropionic Acid**	0.51%
	TOTAL	
Isomer specific Method, Equivalent to:  *2,4-Dichlorophenoxyacetic Acid  **(+)-R-2-(2-Methyl-4-Chlorophenoxy) propionic acid  Contains the single isomer form of MECOPROP-p.	0.84% 0.42%	

## KEEP OUT OF REACH OF CHILDREN

### CAUTION

See back panel for Additional Precautions

Net Weight \_\_ lbs. Treats \_\_ Sq. Ft.

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

9198-46

**ACCEPTED** 

with COMMENTS In EPA Letter Dated: MAY 1 8 2004

EPA Reg. No. 9198-46
EPA Est. 9198-OH-1M, 9198-OH-2B, 9198-AL-001A
Underlined letter is first letter used in run code on bag

Net Weight	lbs.
Treats	sa. ft.

## ANDERSONS WEED AND FEED XX-XX-XX

KEEP OUT OF REACH OF CHILDREAN

CAUTION

### PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Avoid contact with clothing, skin or eyes. Avoid breathing dust and contamination of food and feedstuffs. Do not hand spread. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until dusts have settled. When using this product wear long-sleeved shirt, long pants, 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.

### **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 washwaters. 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.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

### **Weed Control**

2,4-D for control of Broadleaf Plantain, Buckhorn Plantain, Dandelion, Purslane, Pigweed and Smartweed. MCPP-p for control of Common Chickweed, Mouse-ear Chickweed, Red Clover, White Clover, Ground Ivy, Stitchwort and Knotweed. For use on Turfs except Desirable Clovers, Bent, St. Augustine, Dichondra and Carpet Grass.

## When to Apply

Use anytime weeds are actively growing and temperature is above 60 degrees. Control is slower if weather is cool. Application in Spring and Fall provide most effective kill. Apply when lawn is wet from rain, dew or sprinkling. On newly seeded areas, wait until grass has been cut two or three times. Delay planting new grass for at least 3 weeks as 2,4-D may temporarily inhibit seed germination or plant growth. Do not apply when turf is under stress from heat, moisture or drought. Do not over or under apply.

9198-46 Page 3 of 4

### How to Apply

Apply evenly over entire lawn area at the rate of 3-4 lbs. per 1,000 sq. ft. Use the suggested spreader settings as a guide being sure to check your spreader at the beginning of the application. Use only when there is no hazard of drift. Rain, sprinkling, or mowing within 24 hours may reduce effectiveness. Wait at least 2 weeks before making a second application. The maximum number of broadcast applications per treatment site is 2 per year.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Placement of the spreader on an impervious pad to contain spills will help prevent groundwater contamination.

IMPORTANT: Drift of dust or vapors may cause injury to nearby susceptible plants such as vegetables, flowers, fruit trees and ornamentals. Avoid contact with flower beds or shrubs. If accidentally deposited on flowers or shrubs hose off immediately. Do not use on crops that will be used for food or forage purposes. Do not graze animals on treated areas. Do not contaminate water used for irrigation or domestic purposes.

## Suggested Spreader Settings

(Available at final printing)

NOTE: Above spreader settings are approximate. Differences may occur due to condition of spreader, speed at which applied and roughness of area treated. Calculate the size of area to be treated and do not over or under apply. Be sure to shut off spreader while turning or stopping to prevent accidental over-application and burning of grass. Fill spreader on driveway or sidewalk to eliminate chance of spillage on grass. Do not hand spread.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Keep container closed and away from food, feedstuffs and domestic water supplies. DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available. If party filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

### IMPORTANT: READ BEFORE USE:

Read the entire Directions for Use and the Warranty Disclaimer and Limitation of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or Buyer accepts the following Warranty Disclaimer and Limitation of Liability:

### WARRANTY DISCLAIMER and LIMITATION of LIABILITY:

Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. Manufacturer makes NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. Where permissible, it is Manufacturer's intent to LIMIT ANY LIABILITY FOR SPECIAL, CONSEQUENTIAL OR INCIDENTAL ECONOMIC DAMAGES to refund of purchase price or replacement of product, at Buyer's choice. Manufacturer DISCLAIMS ANY LIABILITY FOR COMPENSATORY OR OTHER DAMAGES ARISING OUT OF ANY USE CONTRARY TO LABEL DIRECTIONS. Use contrary to label directions is not permitted.

## (Back Panel)

## LEGAL RIGHTS:

THIS LIMITED WARRANTY GIVES YOU SPECIFIC LEGAL RIGHTS; YOU MAY HAVE OTHER RIGHTS THAT VARY FROM STATE/JURISDICTION TO STATE/JURISDICTION.

Manufactured by: The Andersons Lawn Fertilizer Division, Inc. d/b/a Free Flow Fertilizer PO Box 119 Maumee, OH 43537

Date Printed:	1/29/04
Date Approved:	
Supersedes:	6/30/94
Label changes:	Amendment – isomer change
Filename:	9198-46H (epawork)
Labelcode:	(RVamd121901)

Commercial Use (Front Panel)

# ANDERSONS WEED AND FEED XX-XX-XX

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TOTAL .	100.00%
Isomer specific Method, Equivalent to:  *2,4-Dichlorophenoxyacetic Acid	
KEEP OUT OF REACH OF CHILDREN	
CAUTION	ACCEPTED
See back panel for Additional Precautions	with COMMENTS In EPA Letter Dated:
Net Weight lbs. Treats Sq. Ft.	MAY 18 2004 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.  9198-46
EPA Reg. No. 9198-46 EPA EPA Est. 9198-OH-1M, 9198-OH-2B, 9198-AL-001A Underlined letter is first letter used in run code on bag	***** * * * * * * * * * * * * * * * * *
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Net Weigh	it lbs
Treats	sq. ft.

## ANDERSONS WEED AND FEED XX-XX-XX

Primary plant food derived from:

KEEP OUT OF REACH OF CHILDREAN CAUTION

### PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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### **ENVIRONMENTAL HAZARDS**

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### (Back Panel)

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### STORAGE AND DISPOSAL

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PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal Law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office of guidance.

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 or local authorities, by burning. If burned, stay out of smoke.

### IMPORTANT: READ BEFORE USE:

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### WARRANTY DISCLAIMER and LIMITATION of LIABILITY:

Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. Manufacturer makes NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. Where permissible, it is Manufacturer's intent to LIMIT ANY LIABILITY FOR SPECIAL, CONSEQUENTIAL OR INCIDENTAL ECONOMIC DAMAGES to refund of purchase price or replacement of product, at Buyer's choice. Manufacturer DISCLAIMS ANY LIABILITY FOR COMPENSATORY OR OTHER

(Back Panel)

DAMAGES ARISING OUT OF ANY USE CONTRARY TO LABEL DIRECTIONS. Use contrary to label directions is not permitted.

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