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JUL 20 1999

Mr. Jon M. Gehring Director, Regulatory Affairs LESCO, Inc. 20005 Lake Road Rocky River, Ohio 44116-1545

Dear Hr. Gehring:

Subject: LESCO[®] Turf Fertilizer with 1.25% TEAM* EPA Registration No. 10404-57 Application and Letter Dated August 14, 1997, and Letters Dated August 15, 1997, March 27, 1999 and July 13, 1999 Your Response to the Product-Specific Data Required and Labeling Requirements in the Triffuralin RED, Submission of Revised Labeling

The proposed labeling for the subject pesticide product has been reviewed and found to be acceptable under the federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, provided that the labeling is revised as follows:

- Revise the "Precautionary Statements" by adding as the third and fourth statements: "Do not get in eyes or on clothing." and "Avoid contact with skin.".
- 2. Delete the "Personal Protective Equipment" section and the statment: "applicators and other handlers must wear "goggies or face snield", because the precautionary statements include this requirement and this product is not regulated under the EPA worker Protection Standard.

- If these conditons are not complied with, the registration will be subject to cancellation in accordance with EIERA, section b(e). Your release for shipment of this product under the subject labeling constitutes acceptance of these conditions.

A stamped copy of the proposed label is enclosed for your records.

Sincerely your,

	Joanne 1. Miller Product Manager (23) Herbicide Branch				
SYMBOL					
SURNAME					
DATE					
EPA Form 1320-1 (12-70)	OFFICIAL FILE COP				

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ACCEPTED with COMMENTS In EPA Letter Dated

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JUL 20 1999 Under the Federal Insecticide, Fundicide, and Rodenticide Act as amended, for the pesticide registered under EPA Res. No.

Turf Fertilizer with 1.25% Team*

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

A granular fertilizer plus selective preemergence herbicide for the control of crabgrass and most other annual weed grasses in established: Bluegrass (Perennial), Fescue, Bermudagrass, Centipedegrass, Bentgrass Fairways, Ryegrass (Perennial), Bahiagrass, St. Augustinegrass, and Zoysiagrass.

Active Ingredients:

Benefin: N-butyl-N-ethyl-a,a,a-trifluoro-2,6-dinitro-p-toluidine	%
Trifluralin: a,a,a-trifluoro-2,6-dinitro-N,N-dipropyl-p-toluidine	%
Inert Ingredients:	<u>%</u>
Total	%
Contains 0.625 nounds active ingredient per 50 nound bag	

Contains 0.625 pounds active ingredient per 50 pound bag.

EPA Reg. No. 10404-57

EPA Est. No. 10404-OH-4

KEEP OUT OF REACH OF CHILDREN WARNING

See below for additional precautionary statements.

GUARANTEED ANALYSIS

(Note: fertilizer ingredients and analysis will vary)	
Total Nitrogen	. XX.XX%
X.XX% Ammoniacal Nitrogen	
X.XX % Urea Nitrogen	
X.XX % Water Insoluble Nitrogen (WIN)	
Available Phosphate (P2O5)	. XX.XX %
Soluble Potash (K ₂ O)	. XX.XX %
Ingredients: Urea, Ammonium Phosphate, Muriate of Potash, Urea Formale	2
Chlorine (CI) Max	
*X.XX% Slowly Available Nitrogen from LESCO™ Poly Plus® Sulfur Coated	Urea.

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Made In U.S.A

PRECAUTIONARY STATEMENTS HAZARDS TO HUMAN AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed, inhaled, or absorbed through the skin. Wear goggles, or face shield, or safety-glasses. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Do not get in eyes or on clothing. Wash thoroughly with soap and water

after handling. Remove contaminated clothing and wash before reuse. Avoid breathing dust and contact with skin. This product may cause skin sensitization reactions in some people.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Call a physician or Poison Control Center. <u>Do not induce vomiting</u>. Drink promptly a large quantity of milk, egg white, gelatin solution, or, if these are not available, large quantities of water. Avoid alcohol.

If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists. If in eyes: Call a physician or Poison Control Center. Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. <u>Get medical attention</u>.

<u>If-inhaled</u>: If-breathing discomfort occurs, move-individual to fresh air. Get-medical attention if breathing difficulty occurs.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear: *Goggles or face shield

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.

ENVIRONMENTAL HAZARDS

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 any body of water by direct application, cleaning of equipment, or disposal of wastes. <u>This pesticide is extremely toxic to freshwater marine and estuarine</u> fish and aquatic invertibrates including shrimp and oyster. Do not apply in a manner which will 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.

READ ALL DIRECTIONS CAREFULLY BEFORE APPLYING

STORAGE AND DISPOSAL

<u>Storage</u>: Store in original container only. In case of spill, contain material and dispose as waste. <u>Pesticide Disposal</u>: Do not contaminate water, food, or feed by storage and disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. <u>Container Disposal</u>: 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.

GENERAL INSTRUCTIONS AND INFORMATION

<u>CHEMIGATION</u>: Do not apply this product through any type of irrigation system.

LESCO Fertilizer with TeamTM is a preemergence herbicide which is applied to established turfgrasses for

the control of annual bluegrass (*Poa annua*), smooth and hairy crabgrass, goosegrass, (*silver crabgrass or crowfoot*), barnyardgrass (*watergrass*), and green and yellow foxtail. It controls these annual weeds by killing their seeds as they germinate. Apply this product before these annual weeds begin to germinate since it does not control established weeds. This product will not harm most nearby established ornamental trees and shrubs.

For application to smaller areas, apply the following amounts: Approximate Spreader Settings for LESCO Rotary Spreader*

Pounds Product	Pounds Product		LESCO Calibration
/1,000 sq.ft.	' /Acre	#AI/Acre	Gauge
2.8	120	1.5	#13
3.7	160	2.0	#15
5.5	240	3.0	#17

*IMPORTANT: These settings are only approximate. Age, condition of spreader, and operator speed can cause wide variation. Be sure to calibrate your spreader with each application.

RESEEDING: Chemicals that effectively control annual weed seeds may also affect new desirable turfgrass seedlings. Reseeding should be delayed for at least 6 weeks after applying. When reseeding, it is essential that proper cultural practices such as soil cultivation, irrigation, and fertilization be followed. For satisfactory reseeding results after using product, the amount of seed used should be increased and equipment designed to place seed in contact with the soil should be employed. When using at the highest recommended rate, reseeding should be delayed 12 to 16 weeks after application.

APPLICATION EQUIPMENT: Apply evenly over the turfgrass area without skips or misses. A more uniform application can be made by spreading half the required amount over the area and then applying the remaining half at right angles. Both drop type and rotary type spreaders may be used. Avoid the use of spreaders which would apply the material in narrow, concentrated bands. For best results, use equipment designed to apply granular herbicides and insecticides. Calibrate applicators prior to use according to the manufacturers directions. Check frequently to be sure equipment is working properly and distributing granules uniformly.

HELPFUL APPLICATION TECHNIQUES FOR APPLYING:

- 1. When using a drop-type spreader, a splash board mounted under the hopper will help dispense granules more evenly. A chain fastened to the side of your spreader will leave a marked or scuffed turf area to follow and help prevent missed areas.
- 2. When using tractor mounted or pull-type rotary applicators, it is suggested that a seed application ring and a lime shield be used to control distribution of granules. Early morning applications when the wind is calm and dew is on the ground are ideal. Wheel tracks are easy to follow and granules can be spread uniformly.
- 3.Small area application is easy using a small rotary applicator. To insure proper coverage and avoid missed areas, early morning treatment when wheel tracks are evident in the dew and the wind is calm is ideal.

GENERAL PRECAUTIONS AND RESTRICTIONS

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

<u>PRECAUTIONS</u>: Apply to the turf prior to the germination of weed grasses since it will not control established weeds. It may thin established annual bluegrass (*Poa annua*) turfs and fine-leaved fescues at rate above 120 pounds per acre (1.5 pounds active ingredient). This should not be applied in the spring

to turfgrass planted the previous fall. In bermudagrass areas that have been overseeded with winter grasses, a spring application may thin the over-seeded grasses. Because of varying-cultural practices, do not use on bermudagrass, St. Augustinegrass, or Centipedegrass until these turfs are well established.

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APPLICATION INSTRUCTIONS

<u>Rates, Frequency, and Timing of Application</u> - Successful, preemergence control of the annual grass weeds listed on this label requires proper timing of application. Apply approximately one to two weeks prior to the germination of annual grass weeds. All summer annual grasses do not germinate at the same time. If application timing does not coincide with any of the normal germination periods of any of the annual grass weeds listed on this label, weed control results may be erratic, or poor. Optimum weed control performance will be obtained if treated areas are irrigated soon after application.

1. Spring germinating summer annual grasses - crabgrass, foxtails, and barnyardgrass a. Northern (cool season) turfgrasses

For preemergence control, apply 120 to 160 pounds per acre (1.5 to 2 pounds active ingredient) in the spring one to two weeks prior to the onset of conditions favorable for annual weed grass seed germination. This will apply 0.30 to 0.40 pounds of Nitrogen per 1,000 sq.ft.

b. Southern (warm season) turfgrasses

For preemergence control, apply 160 to 240 pounds (2 to 3 pounds active ingredient) per acre in the late winter or early spring one to two weeks prior to the onset of conditions favorable for annual weed grass seed germination.

In areas of the United States where germination of the annual weed grass seed species continues for extended periods of time, a second application at the recommended rate may be made 8 to 10 weeks after initial treatment for continued control.

2. Late spring, early summer germinating annual grasses - goosegrass

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

a. Northern (cool season) turfgrasses

For preemergence control, apply 160 pounds (2 pounds active ingredient) per acre in the late spring or early summer one to two weeks prior to the expected germination of goosegrass.

b. Southern (warm season) turfgrasses

For preemergence control, apply 160 to 240 pounds (2 to 3 pounds active ingredient) per acre in the late spring or early summer one to two weeks prior to the expected germination of goosegrass.

3. Northern and Southern Turfgrasses

In areas of the U.S. where preemergence control of both early annual grasses (crabgrass, foxtails, and barnyardgrass) and later germinating goosegrass is desired, two applications at the recommended rate spaced 8 to 10 weeks apart may be made to provide full season control of these annual grass species.

4. *Poa annua* (annual bluegrass)

In areas of heavy infestation of annual bluegrass, its elimination will temporarily result in thin turfgrass areas. Proper fertilization, irrigation and soil incorporated reseeding will encourage existing desirable turfgrasses and newly planted seeding turfgrasses to fill in these thin areas previously occupied by annual bluegrass.

a. Northern (cool season) turfgrasses

For preemergence control, apply 160 pounds (2 pounds active ingredient) per acre in the late summer or early fall and again in late winter or spring one to two weeks prior to the expected germination of annual bluegrass.

b. Southern (warm season) turfgrasses

For preemergence control, apply 240 pounds (3 pounds active ingredient) per acre in the late summer

or early fall one to two weeks prior to the expected germination of annual bluegrass. In southern areas of the U.S. where germination of annual bluegrass continues for extended periods of time, a second application at 174-261 pounds per acre can be made 10 to 12 weeks after the initial treatment.

WARRANTY

LESCO warrants that this herbicide conforms to the chemical description on its label. When used in accordance with label direction under normal conditions, this herbicide is reasonably fit for its intended purposes. Since timing, method of application, weather, plant and soil conditions, mixture with other chemicals, and other factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label direction or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

*Team is a trademark of DowElanco. LESCO is a registered trademark of LESCO, Inc.

> LESCO, Inc. 20005 Lake Road Rocky River, Ohio 44116

Net Weight: 50 lbs. Made in U.S.A.

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