

32802-31

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Kresti A. Lyddon
Howard Johnson's Enterprises, Inc.
700 W. Virginia St., Suite 222
Milwaukee, WI 53204-1548

SUBJECT: Conversion from 2,4-DP and MCPP to 2,4-DP-p and MCPP-p
EPA Registration No. 32802-31
All Season Weed and Feed
Your Resubmission Dated October 22, 2002

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 salt 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 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 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 basic Confidential Statement of Formula, dated October 22, 2002, has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSF's 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

7505C
MJM/jan
2/27/03

ALL SEASON WEED & FEED

PREMIUM HERBICIDE KILLS DANDELIONS, CLOVER, GROUND IVY & OVER 40 OTHER WEEDS

KILLS WEEDS QUICKLY & MAKES YOUR LAWN LUSH & GREEN

KILLS UGLY DANDELIONS, CHICKWEED, CLOVER, GROUND IVY, PLANTAIN, RAGWEED & OVER 40 OTHER COMMON BROADLEAF WEEDS

FAST-ACTING NUTRIENTS MAKE YOUR LAWN GREENER & LUSHER

USE IN LATE SPRING OR EARLY SUMMER WHEN WEEDS ARE GROWING

USE IN LATE SUMMER OR EARLY FALL WHEN WEEDS ARE ACTIVELY GROWING

APPLY TO WET LEAVES FOR THE BEST CONTROL

18 POUNDS COVERS 5000 SQUARE FEET

20 POUNDS COVERS 5000 SQUARE FEET

ACTIVE INGREDIENTS:

*Dimethylamine salt of 2,4-dichlorophenoxyacetic acid 0.313%

**Dimethylamine salt of (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid ‡ 0.157%

***Dimethylamine salt of (+)-R-2-(2,4-dichlorophenoxy) propionic acid ‡ 0.155%

INERT INGREDIENTS: 99.375%

TOTAL: 100.000%

Isomer Specific AOAC Method 6.321, Equivalent to:

*0.26% 2,4-dichlorophenoxyacetic acid

**0.13% (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid

***0.13% (+)-R-2-(2,4-dichlorophenoxy) propionic acid

‡Contains the single isomer forms of Mecoprop-p and Dichlorprop-p.

EPA Reg. No. 32802-31

EPA Est. No. 32802-WI-1 (A), 32802-MO-1 (B)

First letter of bag code shows establishment where manufactured. See tag attached to bag for fertilizer guaranteed analysis.

Manufactured by:

HOWARD JOHNSON'S ENTERPRISES, INC.

700 W. Virginia Street, Milwaukee, WI 53204-1548

Read the entire "Directions for Use" and "Warranty Statement" before using this product. If terms are not acceptable, return the unopened product container at once to the seller.

KEEP OUT OF REACH OF CHILDREN

CAUTION: See back panel for further cautions, first aid information and directions for use.

NET WEIGHT: 18 pounds (or 20, 36, 40, 50, 54 or 60 pounds)

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 nontarget 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 apply when weather conditions favor wind drift of product from target area since this product will injure beans, cucumbers, grapes, roses, tomatoes, and most vegetables, flowers and ornamental plants. Do not apply where run-off is likely to occur. Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water when disposing of equipment washwaters.

First Aid

If in eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> 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 do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call toll-free, 1-877-800-5556 for emergency medical treatment information.

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.

This product will control the most prevalent broadleaf weeds occurring in home lawns, while providing a blend of nutrients that will make your lawn lush and green. When used according to instructions, this product will control the following weeds in your lawn: Black Medic, Buckhorn, Burdock, Chickweed, Chicory, Clover, Dandelion, Dock, English Daisy, Ground Ivy, Heal-All, Knotweed, Lambsquarter, Mallow, Morning-glory, Pigweed, Plantains, Poison Ivy, Poison Oak, Purslane, Ragweed, Red Clover, Red Sorrel, Speedwell, Spurge, Stitchwort, White Clover, Wild Carrot, Wild Garlic, Wild Lettuce, Wild Onion, Yarrow, and many other broadleaf weeds.

This product may be used on bluegrass, fescue, ryegrass, Bermuda, St. Augustine, centipede grass, bahia and zoysia lawns and ornamental turf. Do not use on dichondra, carpetgrass or bentgrass lawns. Keep away from inside the drip line of shrubs and ornamentals. Do not allow product to drift onto vegetables or flower gardens, ornamental trees or shrubs.

(Label for EPA Reg. No 32802-31, PAGE 1 OF 2)

WHEN TO APPLY: Best results are obtained when weeds are growing rapidly. Use in late spring or early summer when weeds are growing.

(Optional wording when product is intended for fall application:)

Apply in late summer or early fall to control broadleaf weeds that have grown during the summer months.

1. Apply when grass is moist (from dew, rain or irrigation).
2. Avoid mowing or watering the lawn for 48 hours after application. This gives the broadleaf weed killer time to be absorbed into the weed leaves. Do not apply if rainfall is expected within 48 hours following treatment.
3. In cases of severe weed infestations, hard to kill weeds such as chickweed, or less than optimal weed killing conditions (e.g. weeds are not actively growing, cool weather occurs, or product was washed off the weed), it may be necessary to retreat the lawn in three to four weeks after the initial application. This application could take the place of the normal summer turf food application.
4. When used during hot (over 85°F) and/or dry conditions, apply this product at one-half the recommended rate to lessen the chance of burning your lawn. Under conditions of adequate moisture, high temperature, and high humidity, temporary discoloration may occur if over-applied on St. Augustinegrass.

Do not reseed lawns for 4 weeks after application. Do not apply to newly seeded lawns until after 3 mowings. The maximum rate to turf is 0.46 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.

HOW TO APPLY: Apply this product at the rate of 3.6 pounds per 1000 square feet of turf (18 lbs to cover 5000 sq. ft.; 36 lbs to cover 10,000 sq. ft.; 54 lbs to cover 15,000 sq. ft.; 157 lbs per acre)

SPREADER SETTINGS	
to apply at the listed pounds per 1000 square feet	
3.6 pounds (or 4 pounds, as appropriate for bag size)	
Spreader A	X
Spreader B	X
Spreader C	X
Spreader D	X

(May contain additional spreader brands/models, spreader settings and spreader use instructions as appropriate for the product)

(Alternate wording for use with 20, 40 or 60 lb bag size:)
Apply this product at the rate of 4 pounds per 1000 square feet (20 lbs to cover 5000 sq. ft.; 40 lbs to cover 10,000 sq. ft.; 60 lbs to cover 15,000 sq. ft.; 174 lbs per acre)

Apply with a lawn spreader, either with one pass or by applying at half-rate in two passes. If spread using the two-pass method, run the second pass at right angles to the first.

The following spreader settings are approximate. Check your spreader manual for additional instructions. The condition of your spreader will greatly affect its rate of application. Walk at a normal pace while applying.

(Optional wording for use with fertilizer inerts that may cause staining:)
This product may stain driveways, walks, patios, pools, etc. Sweep off thoroughly immediately after each use.

(Optional wording for compliance with Kentucky fertilizer registration:) A lawn typical will utilize 1 to 4 pounds of Nitrogen per growing season. When used as directed, this product will supplement your regular fertilizer program by providing **(Number of pounds)** of Nitrogen per 1,000 square feet. Please consult your local extension office for questions regarding a regular fertilizer program suitable for your geographic region.

(Optional wording for products distributed in WA state:)
*This product has been registered with the WA State Dept. of Ag. When applied as directed, this fertilizer meets the WA standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about WA standards from the distributor of this product.

Information received by the WA State Dept. of Agriculture regarding the components in this product is available on the Internet at <http://www.wa.gov/agri/>.

GUARANTEE: This product is unconditionally guaranteed.

(Alternate wording for warranty statement:)

GREEN GUARANTEED: Your satisfaction is guaranteed when this product is used in accordance with instructions. If product performance is less than satisfactory, seller will refund the full purchase price with evidence of purchase.

(Alternate wording for warranty statement:)

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

(Alternate wording for warranty statement:)

WARRANTY AND DISCLAIMER: Manufacturer/seller warrants that this product conforms to the ingredient statement on the label, and that the product is reasonably suited for the labeled use when applied according to directions. Buyer and user assumes all risks and liability of use, storage and/or handling of this product not in accordance with the terms of this label. Manufacturer/seller makes no other warranty, expressed or implied, and shall not be liable for indirect or consequential damages.

(Alternate wording for warranty statement:)

WARRANTY AND DISCLAIMER: Manufacturer/seller warrants that this product conforms to the ingredient statement on the label, and that the product is reasonably suited for the labeled use when applied according to directions. Buyer and user assumes all risks and liability of use, storage and/or handling of this product not in accordance with the terms of this label. No other warranty, expressed or implied, is made concerning the merchantability or fitness for a particular purpose. Manufacturer/seller's liability shall be limited to the purchase price of the product. In no case shall manufacturer/seller be liable for consequential or incidental damages or loss.

(Alternate wording for warranty statement:)

WARRANTY AND DISCLAIMER: Manufacturer/seller warrants that this product conforms to the ingredient statement on the label, and that the product is reasonably suited for the labeled use when applied according to directions. No other warranty, expressed or implied, is made concerning the merchantability or fitness for a particular purpose. Manufacturer/seller's liability shall be limited to the purchase price of the product. In no case shall manufacturer/seller be liable for consequential or incidental damages or loss. Buyer and user assumes all risks and liability of use, storage and/or handling of this product not in accordance with the terms of this label. Products not accepted under these terms should be returned within 20 days in the original, unopened container for return of purchase price.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in original container in a locked storage area out of reach of children and domestic animals.

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.

(Alternate wording for household use:)

DISPOSAL:

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

IF PARTLY FILLED: Call your local solid waste agency for disposal instructions. Never place any unused product down any indoor or outdoor drain or toilet.