

SEP 26 2002

Stacy S. Hartis
Adams Technology Systems
5145 Forest Run Trace - Suite B
Alpharetta, GA 30022-4504

Dear Ms. Hartis:

SUBJECT: Conversion from MCPP to MCPP-p
AT Weed and Grass Killer RTU
EPA Registration No. 40849-71
Your Application Dated June 3, 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 ingredient mecoprop from its racemic forms [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 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.

A copy of the revised Confidential Statement of Formula, dated June 3, 2002 has been placed in the Agency's file for the subject product. Please note to correct your CSF to reflect that it is the "basic" CSF (as confirmed by you via telephone). This CSF supersedes all previously submitted CSF's for this product.

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<i>[Signature]</i>								
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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

AT WEED & GRASS KILLER RTU

For Use Around Walks, Driveways, Fences, in Gravel or Bark Ground Mulch, in Flower Beds, Around Ornamental Trees and Shrubs

Kills the Root
Kills Annual and Perennial Weeds, Grasses and Other Unwanted Plants
Visible Results in Just 6 Hours
Complete Kill in 1 to 2 Weeks
No Waiting, Replant Spot Treated Areas the Next Day
Ready-to-Use, Premixed and Premeasured

ACTIVE INGREDIENTS:

Pelargonic Acid	1.72%
Related Fatty Acids (C6-C12)	0.11%
*2,4-dichlorophenoxyacetic acid, dimethylamine salt	0.20%
**†(+)-R-2-(2-Methyl 4 chlorophenoxy) propionic acid, dimethylamine salt.....	0.10%
Fluazifop-P-butyl [Butyl @-2-[4-[[5-trifluoromethyl]-2-pyridinyl]oxy]phenoxy] propanoate]	0.10%

OTHER INGREDIENTS:	97.77%
Total	100.00%

Isomer Specific Method, Equivalent to:

- *2,4-Dichlorophenoxyacetic acid equivalent: 1.66%
- **(+)-R-2-(2-Methyl-4-chlorophenoxy) propionic acid equivalent: 0.082%

Contains 1.54 pounds of Pelargonic Acid, 0.17 pounds of 2,4-D, 0.085 pounds of MCPP-p and 0.08 pounds of Fusilade per gallon.

† CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p

Keep Out of Reach of Children
CAUTION
See back panel for precautionary statements.

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 26 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 40849-71

Net Contents: _____ fl. oz.

{Back Panel}

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Storage and Disposal

Storage: Store this product only in its original container and store in an area out of reach of children and pets. Do not allow this product to freeze. **Disposal:** Do not reuse container. Securely wrap in several layers of newspaper and discard in trash. **Spill or Leak:** In case of spill or leak, soak up spills with cat litter. Sweep cat litter into a plastic bag then discard in trash.

Read the Entire Label Before Using. Use Only in Accordance with Label Precautions and Directions. Shake Well Before Using.

AT Weed and Grass Killer RTU is a fully systemic, non-selective weed killer that will kill most annual and perennial weeds, grasses and unwanted vegetation. Use on sidewalks, driveways, patios, fence lines, around trees, shrubs . . . even in your flower beds to kill unsightly grasses and weeds.

AT Weed and Grass Killer RTU is rainfast in as little as 4 hours. If rainfall does not occur within 4 hours following application, the reapplication is not necessary.

For Spot Treatment of Individual Weeds: Adjust sprayer nozzle to a coarse spray. Apply only when the air is calm to avoid spray from drifting to desirable plants. Position sprayer 12 to 18 inches from weeds. Apply until thoroughly covered.

Important: This is a non-selective weed killer and should not be used for spot weed control in lawns. It kills all green plants including lawn grass. If accidental spraying occurs, immediately wash plant off with water. If spraying in or near flowers, place a piece of cardboard between the weed and flower to prevent accidental splashing. Treated areas may be replanted with ornamentals or flowers one day following treatment.

When to Use

Use anytime weeds and grasses are actively growing. Treated weeds may show initial symptoms within 6 hours and complete kill in 1 to 2 weeks. Larger, more established weeds may need an additional week for complete kill. Product works best in warm, sunny weather with daytime temperature above 55°F. For best results, apply to weeds and grasses that are actively growing. Reapply if rainfall occurs within 4 hours.

Where to Use

For General Weed Control: Use along fences, patios, sidewalks, driveways, around trees, shrubs, ornamental plantings, flower beds and brick or gravel driveways. Use to trim and edge landscape areas. This is a non selective weed killer and should not be used for spot weed control in lawns. It kills all green plants, including lawn grass.

For Spot Spraying: Use on actively growing weeds in and around flower beds, ornamental trees, fruit and nut trees, grapevines, shrubs, fences, driveways and sidewalks. Spray when the air is calm to avoid accidental drift on desirable plants. If necessary, use cardboard or plastic to shield plants.

For Landscaping: Use to prepare areas for planting of ornamental trees, shrubs, rock gardens or flowerbeds. Product may be sprayed over the root zones of desirable plants.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing.

When applying this product: Wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and goggles. **After using this product:** Rinse gloves before removing. Remove clothing and launder separately before reuse. Promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

First Aid

If in Eyes: Flush with plenty of water. Call a physician if irritation persists.

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 or rinsate.

EPA Reg. No. 40849-71

EPA Est. 40849-GA-1

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with this label.

ENFORCER PRODUCTS, INC

P.O. Box 1060

Cartersville, GA 30120-1060

Questions? Call (770) 386-0801, Monday through Friday, 9am to 5pm EST

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