JUN 25 2003

Mr. Robert F. Bischoff Agent for HARRELL'S INC. Total Turf Consulting LLC P.O. Box 7928 Hilton Head, SC 29938

Dear Mr. Bischoff:

This is in response to your request dated May 30, 2003 to change the primary brand name for EPA Registration 52287-10 from Wilbro Fertilizer With Starteem #1 to:

FERTILIZER WITH STARTEEM® # 1

Your request for the name change is accepted and the change will be made to the Agency's records. All future correspondence on this product should reference the new name.

Sincerely yours,

Sherada D. Hobgood

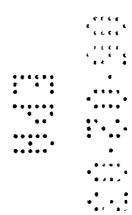
Notifications Review Coordinator

Registration Division (7505C)

These read instructions on reverse before completing form.	Form i	Anneauad	OMB No. 2	070.00 <i>8</i> 0	3. Annoquel avaises 2.22.0	
United States Environmental Protection Agency Weshington, DC 20460			Registra Amenda Other	ion		
Applica	ation for Pesticide - Se	ction	I	<u>-</u>		
1. Company/Product Number 52287-10	2. EPA Product M JOANNE I. MIL	-		١.,	posed Classification	
4. Company/Product (Name) WILBRO FERTILIZER WITH STARTEEM #1	PM# 23					
5. Name and Address of Applicant (Include ZIP Code) HARRELL'S, INC. P. O. BOX 807 LAKELAND, FL 33802 Check if this is a new address	1 ,	N/A			FIFRA Section 3(c)(3) mposition and labeling	
	Section - II					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.	Final prin Agency I "Me Too Other - E	etter dat " Applica	stion.	to		
Explanation: Use additional page(s) if necessary. (For se NOTIFICATION OF PRIMARY BRAND NAME CHANGE PER NOTIFICATION IS CONSISTENT WITH THE PROVISIONS/G REGULATIONS AT 40 CFR 156.10 AND 40 CFR 152.46, AND STATEMENT OF FORMULA OF THIS PRODUCT. I UNDERS STATEMENT TO EPA. I FURTHER UNDERSTAND THAT IF AND 2001-6 AND THE REQUIREMENTS OF 40 CFR 156.10 A	PR NOTICE 98-10 AND LABEL CHUIDANCE OF PR NOTICES 98-10 NO OTHER CHANGES HAVE BE STAND THAT IT IS A VIOLATION OF THIS NOTIFICATION IS NOTICON	AND 200 EN MAD OF 18 U.S ISISTEN	11-6 AND THE E TO THE LAE S.C. SEC.1001 I WITH THE G	REQUIRE BELING OF TO WILLF UIDANCE	MENTS OF EPA R THE CONFIDENTIAL FULLY MAKE ANY FALSE OF PR NOTICES 98-10	
1. Material This Product Will Se Packaged in:	Section - III		<u> </u>	<u> </u>		
Child-Resistant Packaging Yes No Cartification must submitted Unit Packaging Yes Ves Ves Ves Vo If "Yes" Unit Packaging wgt. No. per			2. Type of C	ontainer Metal Plastic Glass Paper Other (Sp	pecify)	
3. Location of Net Contents Information 4. Size(s)	Retail Container	5. Lo	cation of Labe	l Direction	ns	
6. Manner in Which Label is Affixed to Product	thograph Oti	her				
	Section - IV	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·			
1. Contact Point (Complete items directly below for identific	cation of individual to be contacte	d, if nec	essary, to pro-	cese this	epplication.)	
Name ROBERT F. BISCHOFF	Title AGENT, TOTALTURF CO	NSULTI	i i	elephone (317) 873-	No. (Include Area Code)	
Certify I certify that the statements I have made on this form I acknowledge that any knowlingly false or misleading both under applicable law.				olete.	6. Late Application Received (Stamped)	
2. Signeture Robert F. Beschill	3. Tide AGENT, TOTALTURF CONS	ULTING		,	;	
4. Typed Name ROBERT F. BISCHOFF	5. Data MAY 30, 2	003				

Section II (Explanation Continued)

SUBJECT TO ENFORCEMENT ACTION AND PENALTIES UNDER SECTIONS 12 AND 14 OF FIFRA. NON-NOTIFICATION LABEL CHANGES CONSISTENT WITH PR NOTICE 98-10 (IV-D) INVOLVE NEW REGISTRANT NAME, ADDRESS, REGISTRATION NUMBER, AND ESTABLISHMENT NUMBER AS A RESULT OF THE TRANSFER OF REGISTRATION FROM WILBRO TO HARRELL'S.



FERTILIZER***** STARTEEM® # 1

54/8

A NEW! PRE-EMERGENCE HERBICIDE COMBINATION FOR GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, UNIVERSITY, FEDERAL, MUNICIPAL, CORPORATE LAWNS and SOD FARMS

JUN 2 5 2003

50 lb. Bag Treats up to 10,870 Sq. Ft.

FOR SALE TO, USE AND STORAGE BY: GOLF COURSES, SOD FARMS, COMMERCIAL NURSERIES, TURF MANAGEMENT FIRMS, MUNICIPAL, FEDERAL, AND CORPORATE PARKS, LAWNSCAPES, CEMETERIES, AND GROUNDS MAINTENANCE PERSONNEL.

NOT FOR USE ON HOME LAWNS.

STARTEEM® is a pre-emergent weed control product plus a quality fertilizer for use on varieties of Perennial Bluegrass, Bentgrass, Bermudagrass, Buffalograss, Perennial Ryegrass, St. Augustinegrass, Seashore Paspalum, Tall Fescue and Zoysiagrass.

Also for use around Ornamental Shrubs, Vines, Trees, & Ground Covers

ACTIVE INGREDIENTS:

Oxadiazon	(0.500%
Benefin	(0.375%
Trifluralin	(0.375%
OTHER INGREDIENTS:	9	8.750%
Tot	al 106	0.00%

EPA Reg. No. 52287-10

EPA Est. No. 52287-FL-1

GUARANTEED FERTILIZER ANALYSIS

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detaile. (If you do not understand the label, find someone to explain it to you in detail).

FIRST AID

<u>IF IN EYES:</u> 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. 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.

<u>IF INHALED</u>: Remove person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

<u>IF SWALLOWED</u>: Call poison control center or doctor immediately for treatment advice. Have person sin 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.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

20030530.Final Label

A NEW! PRE-EMERGENCE HERBICIDE COMBINATION FOR GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, UNIVERSITY, FEDERAL, MUNICIPAL, CORPORATE LAWNS and SOD FARMS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear long-sleeved shirt and long pants, socks and shoes. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Do not allow domestic animals to graze treated areas. Avoid contamination of feed and foodstuffs.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear protective eyewear; long-sleeved shirt and long pants; waterproof gloves; chemical resistant footwear plus socks. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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 no apply when weather conditions favor drift from areas treated. Do not apply where runoff is likely to occur. 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. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State of Tribe, consult the agency responsible for pesticide regulation. Do not apply the product through any type of irrigation system. Apply only as specified on this label.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with tits labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, and nurseries, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry intervals. The requirements in this box only apply to uses of this project that are covered by the Worker Protection Standard. Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear: coveralls over long-sleeved shirt and long pants, socks, shoes, and waterproof gloves.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements of this box apply to uses of this product that are NOT within the scope of the worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants only on farms, forests, nurseries or greenhouses. Observe and wear (PPE) protective eyewear, long-sleeved shirt and long pants, impervious gloves and chemical resistant footwear plus socks, when handling. Launder exposed clothing before reuse. Thoroughly wash face and hands with soap and water after exposure and before eating or smoking.

STORAGE AND DISPOSAL

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

STORAGE: Store product in its original bag, in a cool dry locked place out of reach of children. In case of spill, sweep up and use according to directions or dispose of as follows. PRODUCT 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 or 1-800-CLEANUP for disposal instructions. Never-place unused product down any indoor or outdoor drain.

Harrell's, Inc. now offers the STARTEEM-SPLIT a new weed control program that finally gets the maximum pre-emergence weed control results that you should expect with 3 active ingredients.

Controls Crabgrass, Goosegrass, Poa Annua, Annual Sedge and many weeds as listed; On Golf Courses, Commercial Lawns, and other Athletic and/or Recreational, Ornamental Turf. If you are serious about getting rid of annual grassy and certain broadleaf weeds before they go to seed again, use STARTEEM #1 and then STARTEEM #2 OR for hard-to-kill weeds follow #1 with STARTEEM #3.

20030530.Final Label

ERTILIZER WITH STARTEEM®

3 of 5 6/8

A NEW! PRE-EMERGENCE HERBICIDE COMBINATION FOR GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, UNIVERSITY, FEDERAL, MUNICIPAL, CORPORATE LAWNS and SOD FARMS

HOW MUCH TO USE AND WHEN TO APPLY THEM!

STARTEEM # 1 is to be used as the <u>first</u> application; STARTEEM # 2 (a different formula), is to be used as the <u>second</u> application of a seasonal (Split-application program) both products to be used at a rate of 200 lbs./acre (equal to 4.6 lbs. /1000 sq. ft.) STARTEEM # 1 may be applied to "established" perennial Bluegrass, Bentgrass (see restrictions), Bermudagrass, Buffalograss, Perennial Ryegrass, St. Augustinegrass, Seashore Paspalum, Tall Fescue and Zoysiagrass turf, at condominium complexes, corporate and public parks, golf courses, sod farms, athletic fields, playgrounds, and other ornamental and recreational turfgrass areas. <u>Not for use on home lawns</u>. The turf should be free of leaves and thatch and in condition to allow granules to reach the soil surface. Know the square footage of the area to be treated and uniformly apply using a granule spreader. Do not apply to turf when it is wet. When using, do not overlap spreader applications, especially on St. Augustinegrass since discoloration "streaking" may temporarily occur from the "doubled rate". Observe the maximum rate of St. Augustinegrass and Bentgrass of one application of each STARTEEM # 1 AND STARTEEM # 2 or # 3 per 1,000 sq. ft. per year. See below restrictions when using on Bentgrass. After applications, if rain is not expected within 24 hours, sprinkler irrigate the treated turf with up to a ½ inch of water to get maximum weed control and quicker response from the fertilizer nutrients. STARTEEM #1, #2, and #3 must be applied prior to weed seed germination (see map of U.S.). They will not control growing weeds. See complete list of weeds that STARTEEM controls under Section for GOLF COURSES.

Weeds Controlled	FIRST	SECOND	Directions			
Crabgrass (Digitaria,spp.) Goosegrass (Bleusine indica) Field Sandbur(Canchusincertus) Annual Sedge (Cyperuscompressus) Annual Bluegrass (Poa annua spp.) (See Note below)	APPLICATION STARTEEM #1 *Apply 200 lbs. product per acre equal to 4.6# / 1,000 sq. ft.	APPLICATION STARTEEM #2 or #3 Apply 60 days later at 200 lbs. per acre equal to 4.6# / 1000 sq. ft.	*Apply #1 40 to 60 days prior to weed seed germination in the late winter or early spring. Apply #2 or #3; 60 days later. Application made after May; may not be fully effective. Apply in late summer to early fall prior to weed seed germination.			
Virginia Buttonweed(Diodia virginiana) Pigweed (Amaranthus spp) Florida Pusley (Richards scabra) Oxalis (Oxalis spp.) Stinging Nettle (Urtica dolca) Carpetgrass (Axonagus offinis)	Apply 200 lbs product per acre equal to 4.6# / 1,000 sq. ft.	Apply 60 days later at 200 lbs per acre equal to 4/6# / 1,000 sq. ft.	Apply in early spring prior to weed seed germination.			
Fall Ap	plication for Spring	Weed Control in Coo	ol Season Turf			
Crabgrass, Goosegrass and other annual weeds as listed	Apply #1 at 200 lbs per acre equal to 4.6# / 1,000 sq. ft.	Apply #3 (60 days later) at 200 lbs. per acre equal to 4.6# / 1,000 sq. ft.	For use in Bluegrass, Bentgrass, perennia Ryegrass and Tall Fescue. Make application in the fall after turf has become dormant. For late fall applications, seeding into treated areas should be delayed until 4 months after greenup.			
Annual Bluegrass Contr	ol in Bermudagrass	Fairways Overseede	d with Perennial Ryegrass only			
Annual Bluegrass (Poa annua spp.)	200 lbs. / A	4.6# lbs. / 1,000 sq. ft.	Apply in late summer to early fall prior to Poa annua spp. seed germination. Any Poa annu			
NOTE: In many areas annual blue subspecies of Poa annua. The true which germinates from seed every annua spp. raptans which behave I summer as an established plant, ca service or University weed special concerning your locale.	annual biotype, "POA a year is controlled while ike a perennial and sui nnot be controlled. Con	innua spp. annua" the biotype, "Poa rvives through the isult the Extension	spp. established when this product is applied will not be controlled. It should not be applied closer than 60 days to overseeding. Do not use when Poa trivialis is present in the overseed mixture. Apply the full 200 lb. rate per acre in one application.			

RTILIZER VITH STARTEEM® # 1

A NEW! PRE-EMERGENCE HERBICIDE COMBINATION FOR GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, UNIVERSITY, FEDERAL, MUNICIPAL, CORPORATE LAWNS and SOD FARMS

Annual Weed Control during establishment from Sprigs of Bermudagrass, Zoysiagrass and Seashore Paspalum Apply 40-60 days Crabqrass and Goosegrass, Annual Sedge and Apply 200 lbs. of other annual weeds. before germination #3 / acre; 60 days at 200 lbs. / per later. acre

For Bermudagrass make application immediately prior to or immediately after sprigging. For Seashore Paspalum make application 10 to 14 days after sprigging. Applications made close to the time of sprigging may cause objectionable Seashore Paspalum injury. Disturbance of the soil surface after application may disrupt the herbicide barrier and reduce effectiveness. For best results sprinkler irrigate the "sprigged" area with up to 1/4 inch water after application.

PRECAUTIONS IN USING: For St. Augustine grass and Bentgrass turf. DO NOT exceed the rate of one application of each STARTEEM#1 and STARTEEM #2 or #3 per 1,000 sq. ft. / year. DO NOT apply to Bentgrass turf mowed less than 3/8 inches. This product may cause discoloration of Bentgrass, Bermudagrass and St. Augustine grass but this discoloration is temporary and normally outgrown within 2 to 3 weeks. Avoid contact with flowers and shrubs except as recommended elsewhere for ornamental plants on this label. DO NOT apply to newly seeded areas. Seeding into treated areas should be delayed until 4 months after treatment except as noted above. DO NOT apply to Dichondra or Centipedegrass. DO NOT use on golf course putting greens or tees because of the varying cultural practices used.

FOR SPRING APPLICATION ON GOLF COURSES UNDER TURF MANAGEMENT Use the STARTEEM-SPLIT application!

Weed control and better turf management can be programmed by using the "STARTEEM-SPLIT" weed control program. Starting 40 to 60 days before expected weed seed germination, apply STARTEEM #1 at a rate of 200 lbs. per acre and follow within 60 days with an application of STARTEEM #2 at the 200 lb. per acre rate. This program supplies 2.5 lbs. of Oxadiazon per acre, per year and 2.5 lbs. of the combination of the Benefin and Trifluralin per acre, per year.

If "Hard-To-Kill" weeds (as listed below) with the asterisk (") are known to be prevalent in the turfgrass area use STARTEEM® #3 as the second application after STARTEEM® #1 applied at 200 lbs. per acre (equal to the 4.6 lbs per 1,000 sq ft).

Controls Annual Broadleaf Weeds and Annual Grasses **Jungle Ricegrass

Annual Bluegrass *Evening Primrose Annual Sedge Fireweed *Barnyardgrass Field Sandbur **Bittercress** Foxtail; Green, Bristly Fall Panicum Carpetweed Carpetgrass Florida Pusley Common Groundsel **Galinsoga Common Pursiane Golden Ragwort Craborass *Goosegrass

Lambsquarter **Liverwort Oxalis **Panama Pespalum Pennsylvania Smartweed Redroot Pigweed Sensitive Plant Shepardspurse

Sow thistle Speedwell Spotted Catsear Spurge; Garden, Petty, **Prostrate Stinging Nettle *Swinecress Virginia Buttonweed

Yellow Woodsorrel

Use the STARTEEM® #1 and STARTEEM® #2 SPLIT application for control of these weeds listed above not bearing the asterisk (). For hard-to-kill weeds use STARTEEM #3 as second application.

NOTE: For newly seeded lawns do not apply this product until after the second or third cutting. For best turf management, place new grass seed in the fall of the year. Spring pre-emergence weed control can then be applied.

SPREADER SETTINGS

Spreader Settings for STARTEEM® #1 STARTEEM® #2 STARTEEM® #3 Cyclone B3-Pro #x.x #x.x #x.x For Scotts Pro R-8A #x.x #x.x #x.x

All STARTEEM products #1; #2; and #3 apply at 200 lbs / Acre = to 4.6# / 1.000 sq. ft.

Plan on an approximately 3 mph spreader speed to obtain best coverage. Know the exact square footage of your area before application. Incorrect application can result in turf damage or poor weed control.

FOR SPRING APPLICATION TO UNIVERSITY, FEDERAL, CORPORATE, MUNICIPAL LAWNS, CEMETERIES; PARKS, ATHI FTIC FIELDS, SOD FARMS, CONDOMINIUMS UNDER MANAGEMENT. FOR PRE-EMERGENCE WEED CONTROL, use a STARTEZM®-SPLIT PROGRAM!

STARTEEM® may be applied to "established" varieties of perennial Bluegrass, Bentgrass (see restrictions), Dermudagrass, Buffalograss, Perennial Ryegrass, St. Augustinegrass, Seashore Paspalum, Tall Fescue, and Zoysiagrass. Weed control and better turn management can be programmed by using the "STARTEEM-SPLIT" weed control program. Starting 40 to 60 days before expected weed seed germination, apply STARTEEM® #1 at a rate of 4.6 lbs per 1,000 sq. ft. and follow with a second application using STARTEEM® #2 at the same rate; within 60 days of the first application. This program supplies 2.5 lbs of Oxadiazon per acre, per year and 2.5 lbs of the combination of the Benefin and Trifluralin per acre, per year.

20030530.Final Label

8/8

FERTILIZER **** STARTEEM® # 1

A NEW! PRE-EMERGENCE HERBICIDE COMBINATION FOR GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, UNIVERSITY, FEDERAL, MUNICIPAL, CORPORATE LAWNS and SOD FARMS

If "Hard-To-Kill" weeds, as listed below with the asterisk (*) are known to be prevalent in the area, use STARTEEM® #3 as the second application after STARTEEM® #1 applied at 200 lbs per acre (equal to the 4.6 lbs per 1,000 sq. ft.)

WHEN TO APPLY AFTER OVERSEEDING TURF

Do not apply to overseeded turf within 60 days after seeding or until after the second mowing, whichever is longer. Injury to desirable seedlings is likely if this product is applied before seedling secondary roots are in the second inch of soil, not thatch plus soil.

WHEN TO OVERSEED AFTER APPLICATION

This product will inhibit the germination of turf species if overseeded too soon after application. Delay overseeding or reseeding 60 to 90 days.

Controls Annual Broadleaf Weeds and Annual Grasses

Annual Bluegrass
Annual sedge
*Barnyardgrass
Bittercress
Carpetweed
Carpetgrass
Common Groundsel
Common Purslane
Crabgrass
*Evening Primrose
Fireweed
Field Sandbur

Fall Panicum
Florida Pusley
*Galinsoga
Golden Ragwort
*Goosegrass
**Jungle Ricegrass
Lambsquarter
**Liverwort
Oxalis
**Panama Paspalum
Pennsylvania Smartweed

Spotted Catsear
Spurge, Garden, Petty,
**Prostrate
Stinging Nettle
*Swinecress
Virginia Buttonweed
Yellow Woodsorrel

Redroot Piaweed

Sensitive plant

Shepardspurse

Sow thistle Speedwell

Approximate Crabgrass Seed Germination Dates in the U.S.A.



Approximate Date After May 30 After May 10 After April 20 After March 20 January 1 to March 20

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

Net Weight 50 Pounds

Harrell's, Inc. P. O. Box 807 Lakeland, FL 33802

