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 52287-11 from Wilbro Fertilizer With Starteem #2 to:

## FERTILIZER WITH STARTEEM® # 2

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)

<b>⊕EPA</b>				ation (	OPP Identifier Number
	Applicat	ion for Pesticide - Se	ection I		
1. Company/Product Number 52287-11		2. EPA Product Manager JOANNE I. MILLER		3. Proposed Classification  ✓ None Restricted	
4. Company/Product (Name) WILBRO FERTILIZER		PM# 23	l		
5. Name and Address of App HARRELL'S, INC. P. O. BOX 807 LAKELAND, FL 3380	·		N/A		FRA Section 3(c)(3) position and labeling
		Section - II			
Notification - Explain  Explanation: Use addition  NOTIFICATION OF PRIMAR  NOTIFICATION IS CONSIST  REGULATIONS AT 40 CFR  STATEMENT OF FORMULA  STATEMENT TO EPA. I FUI	onse to Agency letter dated	Agency I "Me Too Other - E On I and Section II.) R NOTICE 98-10 AND LABEL CI DANCE OF PR NOTICES 98-10 O OTHER CHANGES HAVE BE UND THAT IT IS A VIOLATION CI IS NOTIFICATION IS NOT CON	AND 2001-8 AND THE EN MADE TO THE L OF 18 U.S.C. SEC.100 ISISTENT WITH THE	O PR NOTICE  REQUIREM  ABELING OR  TO WILLFU  GUIDANCE O	ENTS OF EPA THE CONFIDENTIAL ILLY MAKE ANY FALSE OF PR NOTICES 98-10
		Section - III			
1. Material This Product Will Child-Resistant Packaging Yes No Certification must a submitted	Se Packaged In:  Unit Packaging Yes No If "Yes" Unit Packaging wgt.  No. per container	Water Soluble Packaging Yes No If "Yes" No. pe Package wgt contain	or .	f Container  Metal Plastic Glass Paper Other (Spe	cify)
3. Location of Net Contents I	nformation 4. Size(s) Ro	etail Container	5. Location of La	bel Directions	
6. Manner in Which Label is	Affixed to Product Litho	greph Ot r glued piled	her		
		Section - IV			
1. Contact Point (Complete	items directly below for identificati	on of individual to be contacte	d, if necessary, to p	rocess this ep	plicetos.)
Name ROBERT F. BISCHOFF		Title AGENT, TOTALTURF CONSULTING LLC		Telephone No. (Include Area Code) (317) 873-0222	
	Certific ments I have made on this form any knowlingly false or misleading st aw.	d all attachments thereto are to		mplete.	Date Application Received (Stamped)

ROBERT F. BISCHOFF

AGENT, TOTALTURF CONSULTING LLC

MAY 30, 2003

5. Date

## 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.

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



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 PARK, LANDSCAPE, 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

ACTIV	/F	INGREDIENTS:

Oxadiazon		 0.75%
Benefin	•••••••••••••••••••••••••••••••••••••••	 0.25%
Triffuralin		
OTHER ING	REDIENTS:	
		100.00%

EPA Reg. No. 52287-11

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**

IF IN EYES: 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.

IF INHALED: 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.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person eight grass 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 enything 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

A NEW! PRE-EMERGENCE HERBICIDE FOR USE ON GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, 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**

<u>Users should</u>: 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 this product through any type of irrigation system. Apply only as specified on this label.

#### **AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its 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 now offers the Golf Course Superintendent and Grounds Maintenance Managers the "tested" "STARTEEM-SPLIT". A new pre-emergence weed control program that gets maximum benefit from commonly used pre-emergence crabgrass control products!

Controls Crabgrass, Goosegrass, Poa Annus, Annual Sedge and other 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. Here's how to do it. Use STARTEEM#1 and then STARTEEM#2 OR for hard-to-kill weeds follow#1 with STARTEEM#3.

#### 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 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. Not for use on home lawns. 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

## FERTILIZER \*\*\*\* STARTEEM® # 2

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

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 for restrictions when using on Bentgrass. After applications if rain in 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 and #2 must be applied prior to weed seed germination (see map of U.S.). It will not control growing weeds.

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 200 lbs. per acre equal to 4.6# / 1000 sq. ft.	*Apply 60 to 90 days apart in late winter or early spring prior to weed seed germination. See map for proper timing. Application made after April or 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) Stingling Nettle (Urtica dolca) Carpetgrass (Axonagus offinis)	Apply 200 lbs product per acre equal to 4.6# / 1,000 sq. ft.	Apply 200 lbs per acre equal to 4/5# / 1,000 sq. ft.	Apply in early spring prior to weed see germination.		
Fall Ap	plication for Spring	Weed Control in Co	ol Season Turf		
Crabgrass, Goosegrass and other annual weeds as listed	Apply 200 lbs per acre equal to 4.6# / 1,000 sq. ft.	Apply 200 lbs. per acre equal to 4.6# / 1,000 sq. ft.	For use in Bluegrass, Bentgrass, perennial 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 green up.		
Annual Bluegrass Contro	ol in Bermudagrass	Fairways Over seed	ed with Perennial Ryegrass only		
Annual Bluegrass (Poa Annua spp)	200 lbs. / A	4.6# / 1,000 sq. ft.	Apply in late summer to early fall prior to Pos Annua spp. seed germination. Any Poa Annua		
NOTE: In many areas annual blue subspecies of Poa Annua. The true which germinates from seed every Annua spp. raptans" which behave the summer as an established plextension service or University winformation concerning your locale.	annual biotype, "POA a pear is controlled while so like a perennial and ant, cannot be controlled which will be controlled with the controlled wit	Annua spp annua" the biotype, "Poa I survives through blled. Consult the	spp. established when this product is applied will not be controlled. It should not be applied closer than 60 days to over seeding. Do not use when Poa trivialis is present in the overseed mixture. Apply the full 200 lb. Rate per acre in one application.		

# Annual Weed Control during establishment from Sprigs of Bermudagrass, Zoysiagrass and Seashore Paspalum

Crabgrass and Goosegrass, Annual Sedge and other annual 200 lbs. / per acre weeds.

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 sprinkle irrigate the "sprigged" area with up to ¼ 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 per 1,000 sq. ft. / year. DO NOT apply to Bentgrass turf mowed less than 2/8 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 laber. 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.

A NEWI PRE-EMERGENCE HERBICIDE FOR USE ON GOLF COURSES, PARKS, ATHLETIC FIELDS, CEMETERIES, FEDERAL, MUNICIPAL, CORPORATE LAWNS and SOD FARMS

## 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

Annual Bluegrass Annual Sedge \*Barnyardgrass \*Evening Primrose Fireweed Field Sandbur Foxtail; Green, Bristly

Lambsquarter
\*\*Liverwort
Oxalis
\*\*Panama Paspalum

\*\*Jungle Ricegrass

Sow thistle Speedwell Spotted Catsear Spurge; Garden, Petty, \*\*Prostrate

Bittercress
Carpetweed
Carpetgrass
Common Groundsel
Common Purslane
Crabgrass

Fall Panicum Florida Pusley \*Galinsoga Golden Ragwort \*Goosegrass

Pennsylvania Smartweed Redroot Pigweed Sensitive Plant Shepardspurse 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® #2

STARTEEM® #3

Cyclone B3-Pro For Scotts Pro R-8A STARTEEM® #1 #x.x #x.x

#x.x #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, ATHLETIC FIELDS, SOD FARMS, CONDOMINIUMS UNDER MANAGEMENT. FOR PRE-EMERGENCE WEED CONTROL, use a STARTEEM®-SPLIT PROGRAM!

STARTEEM® may be applied to "established" varieties of perennial Bluegrass, Bentgrass (see restrictions), Bermudagrass, Buffalograss, Perennial Ryegrass, St. Augustinegrass, Seashore Paspalum, Tall Fescue, and Zoysiagrass. 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 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 Triffuralin per acre, per year.

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 over-seeded 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.

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

#### Controls Annual Broadleaf Weeds and Annual Grasses

Annual Bluegrass
Annual Sedge
\*Barnyardgrass
Bittercress
Carpetweed
Carpetgrass
Common Groundsel
Common Purslane
Crabgrass
\*Evening Primrose
Fireweed

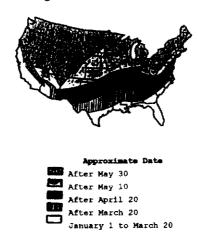
Field Sandbur

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

Redroot Pigweed Sensitive plant Shepardspurse Sow thistle Speedwell Spotted Catsear Spurge, Garden, Petty, \*\*Prostrate Stinging Nettle \*Swinecress Virginia Buttonweed Yellow Woodsorrel

Use STARTEEM #1 then STARTEEM #2 as a SPLIT application for control of these weeds. For "hard-to-kill" weeds with asterisk, use STARTEEM #3 as the Second Application.

### Approximate Crabgrass Seed Germination Dates In the U.S.A.



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

