



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

27 MAY 2008

Charles Boyd
Bayer Advanced
A Business Unit of Bayer CropScience LP
P.O. Box 12014, 2 T.W. Alex
Montvale, NJ 07645

Dear Mr. Boyd:

Subject: RED Label Amendment for 2,4-D, Dicamba and MCPP-p
Trimec + Prodiamine Granular Herbicide Plus Lawn Fertilizer
EPA Registration Number 72155-60

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Per the acute toxicity review, "chemical-resistant gloves made of any waterproof material" should be added to the PPE requirements.
2. Per the combined 2, 4-D, Dicamba and MCPP-p label table, the first paragraph of the Environmental Hazard on Page 6 of the draft label must be revised to read:

"This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters or rinsate."

Per Page 14 of the combined label table, the following text must also be added to the label and any conflicting text must be removed:

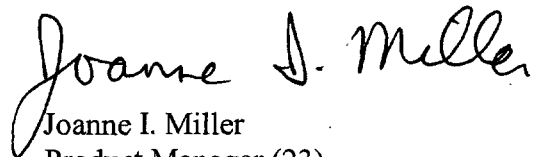
"Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn or garden, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day."

page 2
EPA Reg. No. 72155-60

- 3. Change "Important: Directions for Storage and Disposal" to "Storage and Disposal". Directly after the heading Storage and Disposal add the statement "Do not contaminate water, food, or feed by storage and disposal." Also change the first bullet from "Storage Conditions" to "**Pesticide Storage**" and make the second bullet "**Pesticide Disposal**".
- 4. Under Directions for Use within the "How to Use" section, add: "Maximum of 1.0 lbs ae/acre/application. The maximum yearly application rate is 2.0 lbs ae/acre, excluding spot treatments."
- 5. Under the Notice section, change to read "To the extent consistent with applicable law, the buyer assumes responsibility for lack of performance or safety if not used according to the directions."
- 6. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Enclosure

[FRONT PANEL]

Trimec[®] + Prodiamine Granular Herbicide Plus Lawn Fertilizer

- READY-TO-Spread Granules
- Kills Dandelion, Chickweed, Clover and Many Common Lawn Weeds
- Controls Broadleaf Weeds
- Controls over 200 Broadleaf Weeds
- Kills Weeds
- Easy-to-Use Granules
- Kills the Weeds – Feeds the Lawn
- Won't Harm Lawn (when used as directed)
- Prevents Crabgrass Before It Starts
- Effective Weed Prevention for up to 6 Weeks
- Prevents Crabgrass
- Stops Crabgrass Before It Starts
- Controls Listed Weed Grasses and Broadleaf Weeds

ACCEPTED
with COMMENTS
In EPA Letter Dated:
27 MAY 2008

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

72155-60

ACTIVE INGREDIENTS:

2,4-D (CAS # 94-75-7)	0.69%
Prodiamine (CAS # 29091-21-2)	0.28%
Mecoprop-p (CAS # 16484-77-8)	0.15%
Dicamba (CAS # 1918-00-9)	0.06%

OTHER INGREDIENTS: 98.82%

Net Weight: 16 or 48 Pounds

KEEP OUT OF REACH OF CHILDREN

CAUTION


See back panel for additional ingredients and precautionary statements
 Not For Commercial Use

*Registered Trademark of PBI/Gordon Corporation

[BACK PANEL]

This product provides weed control by killing unsightly weeds, such as dandelion, chickweed, & clover, and stopping [preventing] crabgrass, foxtail, spurge, and oxalis. At the same time its exclusive Triple Action formula feeds continuously at every level for up to X full months. And it's guaranteed not to burn. The result is a greener, thicker lawn.

READ THE LABEL FIRST! (Read the Label First Icon)

Quick Facts	
<ul style="list-style-type: none"> • Kills Weeds and Feeds the Lawn in One Easy Step • Feeds the Lawn and Prevents Crabgrass in One Easy Step • Kills Germinating Weeds , and feeds the lawn in one easy step. • Guaranteed Not To Burn 	
FEEDS	X-X-X Provides Essential Nutrients to Grass, Roots, and Soil (for x months)
KILLS	Dandelion, Chickweed, Clovers, Crabgrass, Foxtail, Spurge, Oxalis and Other Listed Broadleaf and Weed grasses.
COVERAGE	Treats 5,000 sq. ft. (16 lbs.) Treats 15,000 sq. ft. (48 lbs.)
WHERE TO USE	On lawns (Do not use on Bentgrass, Carpetgrass, Dichondra or St. Augustinegrass [including Floratam])
WHEN TO USE	Early Spring (through Summer)
HOW MUCH TO USE	See spreader settings
	Questions or comments, call toll-free 1-877 BayerAG (877) 229-3725 Or visit us on-line at www.BayerAdvanced.com

FOR OUTDOOR RESIDENTIAL USE ONLY

EPA Reg. No. 72155-60

EPA Est. No. XXXX-AA-XX

GUARANTEED ANALYSIS

Total Nitrogen (N) X%
 Available Phosphate (P₂O₅) X%
 Soluble Potash (K₂O) X%

Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-states.com>.

When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials.

Back Panel

DIRECTIONS FOR USE

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

BEFORE YOU USE

Read and follow these directions when using:

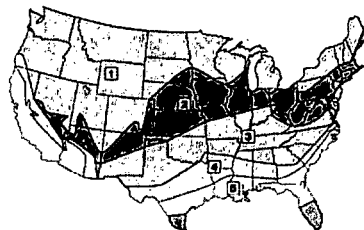
- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.
- Apply when grass is moist – early in the morning when dew is still present or after a brief watering – and wind is calm.
- Avoid applying when temperatures are consistently above 90°F.
- Use care when applying near desirable plants such as flowers, vegetables, shrubs and trees as contact with this weed killer may damage them.
- Follow these recommendations for use on new or refurbished lawns,
 - Seeding
 - Do not apply to overseeded turf for 60 days after seeding or until the second mowing, whichever is longer.
 - Do not overseed for 6 weeks after using this product.
 - Sodding – Do not apply to newly set sod.
 - Sprigging or Plugging – Stolen rooting of newly sprigged or plugged grass may be temporarily slowed.

HOW TO USE

Apply before the typical crabgrass germination date shown for your area.

Approx. Date

- 1 – After May 30
- 2 – After May 10
- 3 – After April 20
- 4 – After March 20
- 5 – Jan. 1 to March 20



Adjust spreader to the proper setting (see Spreader Settings).

To be sure you cover the entire area uniformly, first treat the border of the lawn then fill in the center. Make parallel passes, walking at a steady pace to ensure even distribution of the granules.

Do NOT apply if rain is expected within 24 hours.

Do NOT water for 24 hours after application.

Do NOT apply more than twice a year.

FOR BEST RESULTS

- Best results are obtained when this product is used as part of the (Bayer Advanced Lawn care program).
- Mow lawn to normal height 1 – 2 days before applying this product to expose low growing weeds and stimulate uptake of the weed killer.
- If lawn is dry, water 1 – 2 days before applying this product.
- Make sure lawn receives a thorough watering 2 days after application, either from rain and/or sprinkling.
- A second application may be necessary in areas where there was a lot of crabgrass the year before or where there is a long growing season. Make second application 6 – 8 weeks later. Use the shorter interval when conditions are hot or wet.

HOW Trimec + Prodiamine Granular Herbicide Plus Lawn Fertilizer Works

This product controls existing weeds and controls new weeds in your lawn. Weeds begin twisting & curling in just days and die within 4 weeks.



Do not allow people (other than the applicator) or pets on treatment area during application. Do not allow people or pets to enter the treated area until dust has settled.

Kills:

Annual Bluegrass (from seed)

Annual Yellow Sweetclover

Aster

Austrian Fieldcress

Barnyardgrass (from seed)

Bedstraw

Beggarticks

Betony, Florida

Bindweed, Field

Bird Vetch

Bitter Wintercress

Bittercress, Hairy

Bitterweed

Black-eyed Susan

Black Medic

Black Mustard

Blackseed Plantain

Blessed Thistle

Bloodflower Milkweed

Blue Lettuce

Blue Vervain

Bracted Plantain

Brassbuttons

Bristly Oxtongue

Broadleaf Dock

Broadleaf Plantain

Broomweed

Buckhorn

Buckhorn Plantain

Bulbous Buttercup

Bull Thistle

Bullnettle

Burclover

Burdock

Burning Nettle

Burweed

Buttercup

Buttonweed

Canada Thistle

Carolina Geranium

Carpetweed

Catchweed Bedstraw

Catnip

Catsear

Chickweed, Common

Chickweed, Mouseear

Chicory

Cinquefoil

Clover

Clover, Crimson

Clover, Hop

Clover, Red

Clover, Strawberry

Clover, Sweet

Clover, White

Cockle

Cocklebur

Common Mullein

Crabgrass, Large & Smooth (from seed)

Creeping Charlie

Creeping Jenny

Cudweed

Curly Dock

Daisy, English

Daisy, Fleabane

Daisy, Oxeye

Dandelion

Dichondra

Dogbane

Dogfennel

Dollarweed

Dock

Elderberry

False Dandelion

False Flax

False Sunflower

Fiddleneck

Florida Pusley

Foxtails, Annual (from seed)

Frenchweed

Galinsoga

Goathead

Goldenrod

Goosegrass (from seed)

Ground Ivy

Gumweed

Hairy Fleabane

Hawkweed

Healall

Heartleaf Drymary

Heath Aster

Hedge Bindweed

Hedge Mustard

Hemp

Henbit

Hoary Cress

Hoary Plantain

Hoary Vervain

Horsenettle

Jimsonweed

Johnsongrass (from seed)

Knawel

Knotweed

Kochia

Lambsquarters

Lespedeza

Mallow

Matchweed

Mexicanweed

Milk Vetch

Morningglory

Mouseear Hawkweed

Mugwort

Musk Thistle

Mustard

Narrowleaf Plantain

Narrowleaf Vetch

Nettle

Orange Hawkweed

Oriental Cocklebur

Oxalis

Panicum (from seed)

Parsley-piert

Parsnip

Pearlwort

Pennycress

Pennywork

Peppergrass

Pepperweed

Pigweed

Pineywoods Bedstraw

Plains Coreopsis (Tickseed)

Plantain

Poison Ivy

Poison Oak

Pokeweed

Poorjoe

Prairie Sunflower

Prickly Lettuce

Prickly Sida

Prostrate Knotweed

Prostrate Pigweed

Prostrate Spurge

Prostrate Vervain

Puncturevine

Purslane

Purslane, Common

Ragweed

Red Sorrel

Redroot Pigweed

Redstem Filaree

Rescuegrass (from seed)

Rough Cinquefoil

Rough Fleabane

Russian Pigweed

Russian Thistle

Scarlet Pimpernel

Scotch Thistle

Sheep Sorrel

Shepherdspurse

Signalgrass (from seed)

Slender Plantain

Smallflower Galinsoga

Smooth Dock

Smooth Pigweed

Sorrel

Sowthistle

Spanishneedles

Speedwell

Spiny Amaranth

Spiny Cocklebur

Spiny Sowthistle

Spotted Catsear

Spurge

Spotted Spurge

Spurweed

Stinging Nettle

Strawberry, India Mock

Tall Nettle

Tall Vervain

Tansy Mustard

Tanweed

Thistle

Trailing Crownvetch

Tumble Mustard

Tumble Pigweed

Velvetleaf

Venice Mallow

Virginia Buttonweed

Virginia Creeper

Virginia Pepperweed


Water Pennywort

Wavyleaf Bullthistle
 Western Clematis
 Western Salsify
 White Mustard
 Wild Aster
 Wild Buckwheat
 Wild Carrot
 Wild Four-o'clock
 Wild Garlic
 Wild Geranium
 Wild Lettuce

Wild Marigold
 Wild Mustard
 Wild Onion
 Wild Parsnip
 Wild Radish
 Wild Rape
 Wild Strawberry
 Wild Sweet Potato
 Wild Vetch
 Woodsorrel
 Wooly Croton

Wooly Morningglory
 Wooly Plantain
 Wormseed
 Yarrow
 Yellow Rocket
 Yellowflower Pepperweed

SPREADER SETTINGS		
If your spreader is not listed, please call our toll-free Consumer Service hotline 1-877-BayerAL for help.		
BROADCAST SPREADERS - 3.2 lbs/1,000 sq. ft.		
Models	Setting	Distance Between Passes (ft.)
To be determined	(Spreader settings to be determined.)	To be determined
DROP SPREADERS - 3.2 lbs/1,000 sq. ft.		
Models	Setting	
To be determined	(Spreader settings to be determined.)	
Settings are approximate. The condition of your spreader, the speed at which you walk and uneven terrain may affect the rate of application. Calibrate your spreader according to manufacturer's directions before each application. TIP 1,000 sq. ft. = 20 x 50 ft. Do not use a spreader that applies granules in narrow, concentrated or uneven bands. Be sure the spreader works properly and spreads granules evenly.		

IMPORTANT: Directions for Storage and Disposal	
STORAGE CONDITIONS:	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
DISPOSAL	 <ul style="list-style-type: none"> • 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.

PRECAUTIONARY STATEMENTS	
Hazards to Humans and Domestic Animals	
CAUTION	
<ul style="list-style-type: none"> • Harmful if absorbed through skin, inhaled, or swallowed. • Causes moderate eye irritation. • Avoid contact with skin, eyes, or clothing. • Wear protective eyewear. • Avoid breathing dust. • When using this product, wear long-sleeved shirt, long pants, socks and shoes. • Washing hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco will reduce exposure. • After using this product remove clothing and launder separately before reuse. • Prolonged or frequently repeated skin contact while handling the material may cause allergic reactions in some individuals. 	

First Aid +

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 advise.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration preferable mouth to mouth, if possible. • Contact poison control center or doctor for further 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.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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.

NOTE: Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may call toll-free 1-877-229-3763 for medical emergency information. Active Ingredients: 2,4-D (CAS # 94-75-7), Prodiamine (CAS # 29091-21-2), Mecoprop-p (CAS # 16484-77-8) and Dicamba (CAS # 1918-00-9).

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark, except as noted on appropriate labels. Drift and runoff from treated areas may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

NOTICE

Research and testing have determined that the "Directions for Use" are appropriate for the proper use of this product under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.



www.bayeradvanced.com

A Business Unit of Bayer CropScience LP
 P.O. Box 12014, 2 T.W. Alexander Drive
 Research Triangle Park, North Carolina 27709

Trimec + Prodiamine Granular (PENDING) 01/17/08