UNITED STATES ENVIRONMENTAL PROTECTION AGENCY PM 23 22/7 - 4/88

Mr. James A. Armbruster, Ph.D. PBI/Gordon Corporation 1217 West 12th Street P.O. Box 14090 Kansas City, Missouri 64101

APR 0 1 1996

Dear Dr. Armbruster:

SUBJECT: (1) Label Amendment - Conversion from Manufacturing-Use to End-Use Product for Turfgrass;

(2) Product Name Change; and

(3) Updated Confidential Statement of Formula.

Trimec 873 Herbicide

EPA Registration No. 2217-488

Your Application Dated February 9, 1996

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provisions:

1. You must revise the Oral Statement of Practical Treatment to read as follows:

"IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."

2. You must revise the first sentence of the Pesticide Disposal instructions to read: "Pesticide wastes are acutely hazardous."

3. You must insert the missing word ("per") in the statement specifying the maximum application rate for 2,4-D under "Application Rates". The revised statement should read as follows: "The maximum application rate to turf is 1.2 pounds 2,4-D acid equivalent per acre per application per site."

4. You may, at your discretion, delete the phrase "For terrestrial uses" from the third sentence of the Environmental Hazards section, since there are no aquatic uses for this product.

A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #2:S501720.LET

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The product name as proposed is acceptable. We acknowledge the official name for this product to be "Trimec 873 Herbicide". Please use this name in all future correspondence with the Agency regarding this product.

The Confidential Statement of Formula (CSF), referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A copy of the CSF (Basic Formulation) dated February 9, 1996, has been placed in our file for the subject product. Please note; this accepted CSF now supersedes all previous basic CSFs on file for this product.

Sincerely yours,

Joanne I. Miller Product Manager (23) Fungicide-Herbicide Branch Registration Division (7505C)

Enclosure

TRIMEC[®]873 HERBICIDE

ACCEPTED with COMMENTS In EPA Letter Dated

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APR 0 1 1996

Fundiei: as amer	the Federal Insocticide, de, and Rodanticide Act nded, for the pesticide ed under EPA Rag. No.
* Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	29.94%
** Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy) propionic ac	cid 20.96%
*** Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)	1.97%
INERT INGREDIENTS	<u>47.13%</u>
Total	l 100.00%
THE ADDRESS CONTRACTOR	

THIS PRODUCT CONTAINS:

*2.21 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 24.87% **1.67 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 17.32% ***0.16 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 1.64%

ISOMER SPECIFIC BY AOAC METHODS TRIMEC[®] is a registered trademark of PBI/GORDON CORPORATION

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for additional Precautionary Statements and Statement of Practical Treatment.

NET CONTENTS 55 U.S. GALLONS

APXXXXXX EPA REG. NO. 2217-488 EPA EST. NO. 2217-KS-

Mfd. by PBI/GORDON CORPORATION KANSAS CITY, MISSOURI 64101

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STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS:

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin or clothing. Harmful or fatal if swallowed. Avoid breathing spray mist. When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow, and temple protection.

Personal Hygiene Statements: After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

Statement of Practical Treatment

IF IN EYES: Hold eyelids open and flush with a steady stream of water for at least 15 minutes. Get medical attention.

IF SWALLOWED: Call a physician or a Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching throat with finger, or if available by administering Syrup of Ipecac. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF ON SKIN: Wash skin plenty of soap and water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Engineering Control Statements:

<u>Containers over 1 gallon and less than 5 gallons in capacity</u>: Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron.

<u>Containers of 5 gallons or more in capacity</u>: Do not open pour product from this container. A mechanical system (probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. For terrestrial uses, 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 contaminate water when disposing of equipment washwaters.

When cleaning of equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

DIRECTIONS FOR USE

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

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried.

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STORAGE & DISPOSAL

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

STORAGE: Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: <u>FOR METAL CONTAINERS -</u> Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or by other procedures approved by state and local authorities. <u>FOR PLASTIC CONTAINERS -</u> Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities by burning. If burned stay out of smoke.

- SITES -

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 is intended to be applied by lawn care operators and landscape personnel for use in ornamental lawns and turf established in institutional, ornamental, and residential/domestic sites. Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations including, but not limited to, hospitals, nursing homes, schools, museums, libraries, sport facilities (golf courses), and office buildings. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial and institutional buildings. Finally, residential/domestic sites are defined as areas associated with the household or home life including, but not limited to apartment complexes, condominiums, and patient care areas of nursing homes, mental institutions, hospitals, or convalescent homes.

- APPLICATION SCHEDULES -

Apply this product to emerged broadleaf weeds that are actively growing. Sequential or follow-up applications may be required for dense infestations of perennial and biennial weeds. If required, the treatment interval between the first and second application should be 14 to 28 days.

- APPLICATION RATES -

Dosage rates and spray volume recommendations of this product are presented in Table 1.

Generally, the lower application rates within the specified range will provide satisfactory control of sensitive weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds beyond the appropriate growth stages.

The maximum application rate to turf is 1.2 pounds 2,4-D acid equivalent per acre per application site.

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The maximum number of broadcast applications per treatment site is 2 per year.

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	Amount of Product		Spray Volume	
Species	Pints/Acre	Fl.oz./1000 sq.ft.	Gallons/Acre	Gallons/1000 sq.f
. Cool Season Turf		- -	1	
Kentucky Bluegrass	3.0 - 4.0	1.10 - 1.47	20 - 175	0.5 - 4.0
Perennial Ryegrass	99 .	17	**	es -
Tall Fescue	30	19	¥	10
Fine leaf Fescues Hard Fescues Sheeps Fescue Red Fescue(Chewings Fescue, Slender Creeping Fescue, Spreading Fescue)	17	u	ţa	10
Creeping Bentgrass	1.5 -2.0	0.55 - 0.73	40 - 175	1.0 - 4.0
II Warm Season Turf				
Common Bermudagrass	3.0 - 4.0	1.10 - 1.47	20 - 175	0.5 - 4.0
Hybrid Bermudagrass	n	10	и	IJ
Zoysiagrass	H	N	"	17

- USE PRECAUTIONS -

- Do not apply this product through any type of irrigation system.
- Avoid drift of spray mist to vegetables, flowers, ornamentals, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants.
- Do not spray on St Augustinegrass, centipedegrass, carpetgrass, dichondra, nor on lawns or turf where desirable clovers are present.
- Coarse sprays are less likely to "wind-drift." Avoid fine mists. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area. Be particularly careful within the dripline of trees and other ornamental species.
- Do not apply to newly seeded grasses until well established.
- Do not broadcast apply when air temperatures exceed 85°F; some injury may be expected with spot treatments when air temperatures exceed 85°F.
- Seed can be sown 3 to 4 weeks after application at recommended rates.
- After using this product, clean sprayer with Gordon's Spray Tank Cleaner and water, and rinse thoroughly before applying other pesticides.

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WEEDS CONTROLLED

Bedstraw	Istraw Henbit Purslane	
Black Medic	Knotweed	Ragweed
Buckhorn	Lambsquarters	Sheep Sorrel
Burdock	Lespedeza	Shepherdspurse
Chicory	Mallow	Speedwell
Chickweed	Morningglory	Spurge
Clover	Peppergrass	. Wild Carrot
Dandelion	Pigweed	· Wild Garlic
Dock	Plantain	Wild Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow

· This product controls a wide spectrum of weed species including the following:

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

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