

2217-493

11/01/2001

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

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

NOV 1 2001

Mr. Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, Missouri 64101

Dear Mr. Martens:

Subject: Label Revision Amendment - Revised Directions For Use
And Ingredients Statement
Trimec® 869 Herbicide
EPA Registration No. 2217-493
Your Amendment Application Submission Dated
July 27, 2001

The labeling, 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. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Under the subheadings entitled "NON-WPS USES" and "WPS USES," please incorporate the following statement: "Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selection chart."

In addition, under the subheadings entitled "NON-WPS USES," "WPS USES," and the Agricultural Use Requirement box, please revise "waterproof gloves" to read as "chemical-resistant gloves; such as barrier laminate, butyl rubber, nitrile rubber or viton".
 - b. Under the heading entitled "STORAGE & DISPOSAL," please revise the subheading "STORAGE" to read as "PESTICIDE STORAGE".
2. Please submit one (1) final printed copy of the referenced label, incorporating the above change, before releasing the product for shipment.

M. HOWARD
PM TEAM 23
(703) 305-6784

A stamped copy is enclosed for your records. The amended labeling supercedes all previously accepted ones. If you have any concerns or questions regarding this letter, please call Marcel Howard at (703)305-6784.

Sincerely yours,

Joanne I. Miller
Product Manger (23)
Herbicide Branch
Registration Division (7505C)

Enclosures

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TRIMEC® 869 HERBICIDE

USE THIS PRODUCT ONLY IN ACCORDANCE WITH ITS LABELING AND WITH THE WORKER PROTECTION STANDARD 40CFR PART 170.

ACTIVE INGREDIENTS:

- Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid ... 10.89%
- Dimethylamine salt of 2,4-dichlorophenoxyacetic acid 20.36%
- Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid) 2.06%

INERT INGREDIENTS: 66.69%

TOTAL 100.00%

THIS PRODUCT CONTAINS:

- 0.82 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton-qr 9.00%
- 1.54 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 16.92%
- 0.15 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 1.71%

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

ACCEPTED
with **COMMENTS**
In EPA Letter Dated
NOV | 2001

*Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
227-493*

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted in detalle. (If you do not understand the label, find some one to explain it to you in detail.)

First Aid Statements	
If in eyes:	<ul style="list-style-type: none"> • 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:	<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 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 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, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

See side panel for Precautionary Statements.

NET CONTENTS: 2.5, 15, 30 OR 55 U.S. GALLONS

AP070201
EPA REG NO. 2217-493
EPA EST NO 2217-KS-1
MANUFACTURED BY:





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. Causes skin irritation. Do not get into eyes, on skin or clothing. Harmful if swallowed or inhaled. Avoid exposure to spray mist.

NON-WPS USES:

Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) – in general, only agricultural-plant uses are covered by the WPS – must wear the following:

- Wear face shield or goggles when mixing, loading or applying this product. 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.

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.

Engineering Control Statements For Non-WPS Uses:

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

Containers of 5 gallons or more: Do not open-pour from this container. A mechanical system (such as 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.

WPS USES:

Applicators and other handlers who handle this pesticide for any uses covered by the Worker Protection Standard (40 CFR Part 170) – in general agricultural-plant uses are covered – must wear the following:

- Coveralls over short-sleeved shirt and short pants.
- Waterproof gloves.
- Chemical-resistant footwear plus socks.
- Protective eyewear.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

Engineering Control Statements For WPS Uses:

Containers over 1 gallon and less than 5 gallons: Mixers and loaders who do not use a mechanical system (probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

Containers of 5 or more gallons: Do not open-pour product from this container. A mechanical system (such as a 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. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations:

- ◆ Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- ◆ Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- ◆ Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. 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 washwater.

When cleaning 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 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 or Tribe, consult the agency responsible for pesticide regulation.

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, nurseries, and greenhouses, 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 and restricted-entry interval. The requirements in this box only apply to uses of this product 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 48 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 short-sleeved shirt and short pants • Waterproof gloves • Chemical-resistant footwear plus socks • Protective eyewear.

Non-Agricultural Use Requirements

The requirements in 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 on farms, forests, nurseries, or greenhouses.

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

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 acutely hazardous. 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: *For Metal Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. *For Plastic Containers* - 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.

ORNAMENTAL LAWNS, ORNAMENTAL TURFGRASS AND SOD FARMS:

This product is intended to be applied by lawn care operators, maintenance applicators, and service technicians 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. 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. Trimec® 869 Herbicide is intended for use on sod farms. Trimec® 869 Herbicide provides selective broadleaf weed control in warm season turfgrass and cool season turfgrass.

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.

The herbicide recommendations are based upon three (3) levels of management.

Management Category	Rate Recommendations	Typical Cultural Practice	Examples
Class A	See Table 1	frequent mowing, fertilization, pesticide control, irrigation	fairways, sportfields, high quality, home lawns, improved industrial grounds, parks, sod farms, some cemeteries
Class B	See Table 1	frequent mowing with occasional herbicide and fertilizer applications	industrial grounds, most cemeteries, golf course roughs, most home lawns, fairgrounds,
Class C	See Table 2	infrequent mowing and occasional herbicide applications	highway rights-of-way (principal, interstate, county, private, and unpaved roads), roadsides, industrial sites, airports

TABLE 1. Rate recommendations for broadcast applications of Trimec® 869 Herbicide under Class A and B levels of management.

Species	Amount of Product	Spray Volume
	Pints/Acre	Gallons/Acre
Cool Season Turf		
Kentucky Bluegrass	4.0 - 5.0	5 to 175
Perennial Ryegrass	4.0 - 5.0	5 to 175
Fescue spp.	4.0 - 5.0	5 to 175
Creeping Bentgrasses	2.0 - 3.0	5 to 175
Warm Season Turf		
Common Bermudagrass	3.0 to 4.0	5 to 175
Hybrid Bermudagrass	3.0 to 4.0	5 to 175
Bahiagrass	3.0 to 4.0	5 to 175
Zoysiagrass	3.0 to 4.0	5 to 175

TABLE 2. Rate recommendations for broadcast applications of Trimec® 869 Herbicide under Class C levels of management.

Species	Amount of Product	Spray Volume
	Pints/Acre	Gallons/Acre
Cool Season Turf		
Kentucky Bluegrass	4.75 - 6.25	5 to 175
Perennial Ryegrass	4.75 - 6.25	5 to 175
Fescue spp.	4.75 - 6.25	5 to 175
Mixtures of cool season species in noncropland areas established for roadside vegetation management or for low maintenance. (Kentucky bluegrass, tall fescue, smooth brome grass, and orchardgrass)	4.75 - 6.25	5 to 175
Warm Season Turf		
Common Bermudagrass	3.0 to 5.0	5 to 175
Bahiagrass	3.0 to 5.0	5 to 175
Zoysiagrass	3.0 to 5.0	5 to 175

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 1.25 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

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 roots of ornamentals and trees. Be particularly careful within the dripline of trees and other ornamental species.
- ◆ Do not apply this product to bentgrass greens, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.

- ◆ Do not apply this product to St. Augustinegrass and centipedegrass.
- ◆ Do not exceed specified dosages for any area.
- ◆ Do not apply to newly seeded grasses until well established (2 mowings).
- ◆ Do not broadcast apply when air temperatures exceed 85°F; some injury may occur with spot treatments when air temperatures exceed 85°F.
- ◆ Seed can be sown 3 to 4 weeks after application at recommended rates.
- ◆ Environmental conditions and certain spray tank additives (eg. adjuvants, wetting agents, surfactants), liquid fertilizers, and tank mixtures containing emulsifiable concentrates may reduce the selectivity on the turfgrass.

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

- PARTIAL LIST OF BROADLEAF WEEDS -		
Aster, white heath & white prairie	Field bindweed (*morningglory & creeping jenny)	Poison oak
Bedstraw	Field oxeye-daisy (*creeping oxeye)	Prostrate knotweed (*knotweed)
Beggarweed, creeping	Filaree, whitestem & redstem	Puncturevine
Bindweed	Florida pusley	Purslane
Black medic	Ground ivy	Ragweed
Broadleaf plantain	Groundsel	Red sorrel (*sheep sorrel)
Buckhorn plantain	Hawkweed	Shepherdspurse
Bull thistle	Healall	Spotted spurge
Burclover	Henbit	Spurge
Burdock, common	Lambsquarters	Thistle
Buttercup, creeping	Lawn burweed	<i>Veronica</i> (*corn speedwell)
Carpetweed	Lespedeza, common	Virginia buttonweed
Chickweed, common	Mallow, common	White clover (*Dutch clover, honeysuckle clover, white trefoil & purplewort)
Chicory	Matchweed	Wild carrot
Cinquefoil	Mouseear chickweed	Wild garlic
Clover	<i>Oxalis</i> (*yellow woodsorrel & creeping woodsorrel)	Wild geranium
Compassplant	Parsley-piert	Wild lettuce
Curly dock	Pennsylvania smartweed	Wild mustard
Dandelion	Pennywort (*dollarweed)	Wild onion
Dayflower	Pepperweed	Wild strawberry
Deadnettle	Pigweed	Wild violet
Dock	Pineappleweed	Yarrow
Dogfennel	Plantain	Yellow rocket
English daisy	Poison ivy	
False dandelion (*spotted catsear & common catsear)		

*Synonyms

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.

