

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM 23

2217-507

10-20-98

1046

Craig Martens
 PBI/Gordon Corporation
 1217 West 12th Street
 P.O. Box 14090
 Kansas City, MO 64101-0090

OCT 20 1998

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
 Gordon's Broadleaf and Dandelion Lawn Weed Killer
 EPA Registration No. 2217-507
 Your Submission Dated September 2, 1998

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (basic formulation dated September 2, 1998) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

DK:305-7546:HB/PM23

CONCURRENCES

SYMBOL	7505C							
SURNAME	D. KENNY							
DATE	10/20/98							

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

Sincerely yours,

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

Enclosure



3046

GORDON'S BROADLEAF AND DANDELION LAWN WEED KILLER

CONTAINS TRIMEC® HERBICIDE

-KEEP FROM FREEZING-

Covers 10,800 Square Feet

Controls Dandelion, Knotweed, Henbit, Plantain, Spurge, Poison Ivy, and other broadleaf weeds.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid	8.7%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	4.3%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	13.2%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	0.8%

INERT INGREDIENTS:.....	77.3%
INERT INGREDIENTS:.....	81.7%
TOTAL	100.0%

THIS PRODUCT CONTAINS:

- 0.64 lb. 2-(2-Methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 7.2%
- 0.31 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 3.6%
- 0.97-0.95 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 10.9%
- 0.06 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.7%

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of FBI/GORDON CORPORATION

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for Precautionary Statements.

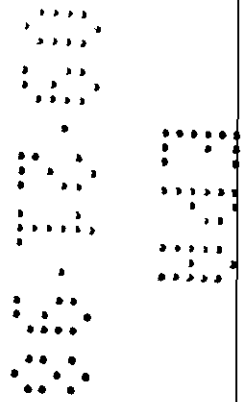
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663 APXXXXXX
 EPA REG. NO. 2217-507
 EPA EST. NO. 2217-KS-1



ACCEPTED
 with COMMENTS
 in EPA Letter Dated
 OCT 20 1998

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-507





4076

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid **contact** with eyes, skin or clothing. Wear face shield or goggles when mixing, loading or applying this product. When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves.

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**.

In case of contact, immediately flush **eyes or skin** with plenty of water. If irritation develops, get medical attention.

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. 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. Do not apply when weather conditions favor drift from target areas.

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 and 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 or **dust** has settled.

STORAGE & DISPOSAL

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

PRODUCT DISPOSAL: Securely wrap **original** container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse **container**. Rinse thoroughly before discarding in trash.

USE PRECAUTIONS:

Do not apply this product through any **type of** irrigation system. Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not spray solution near these plants. Coarse sprays are less likely to **drift**. Do not spray on carpetgrass, dichondra, nor on lawns or turf where desirable bentgrass or clovers are present. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any **area**; be particularly careful within dripline of tree and other ornamental species. This product may be injurious to St. Augustinegrass and centipedegrass. Since injury can be expected spot spray **weeds only** with a pressure sprayer. After using this product, clean sprayer thoroughly with soap or **detergent** and water and rinse thoroughly before applying other pesticides. Failure to observe the above **precautions** may result in injury.

Safe

WHERE TO USE:

Gordon's Broadleaf and Dandelion Lawn Weed Killer may be used on bluegrass, bermudagrass, or zoysiagrass lawns, vacant lots, playgrounds and other similar areas where hard-to-kill weeds are present. This product is especially effective on all types of hard-to-kill weeds such as henbit, chickweed, knotweed, spotted spurge, oxalis, black medic, and sheep sorrel. In addition to these, Trimec® controls most other broadleaf lawn weeds, including dandelion and plantain and a partial list is given on this label.

WHEN TO USE:

Spray at any time during the growing season when weeds are actively growing. Treat chickweed, henbit, wild onion and garlic in the fall or in the spring, as needed. On new lawns wait until the turf has reached a height of 2 inches before making an overall spray treatment. Spot spray treatments may be made at any time with a small pressure sprayer. Wait 3 weeks before seeding or planting stolons, plugs, or sprigs. Poor weed control may result if spray is applied during drought or just before rain. For best results mow before treating. Do not water lawn within 24 hours after treatment.

HOW MUCH TO USE - ENTIRE LAWN:

The maximum application rate to turf is 1.0 pounds of 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

Professional Lawn Applicator:

Use 8.2 pints/Acre (3 fluid ounces/1,000 square feet) in 44 to 130 gallons water/Acre (1 to 3 gallons water/1,000 square feet).

Hose End Sprayer:

Use a hose end sprayer designed for lawns. Put recommended amount of product (Column 1) in bottle and add water to indicated level (Column 2), and spray on area indicated. For example - to spray 1,700 square feet, measure 5 fluid ounces (10 tablespoons) in jar and add water to the 10 gallon level and mix. Turn on hose and spray as evenly as possible over 1,700 square feet.

Column 1		Column 2	Column 3
Amount of Trimec® to Use		Fill Bottle to	Area to Treat
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Feet)
1	½	1	170
5	2½	5	850
10	5	10	1,700
15	7½	15	2,500

Pressure Sprayers:

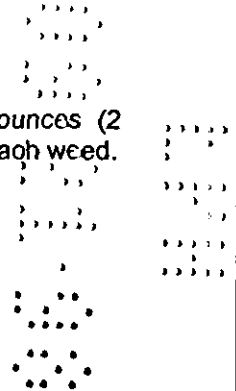
Measure indicated amount of product into tank and dilute with water according to the following chart. Use a spray pattern which gives small spray droplets without any fine mist and cover the area indicated.

Amount of Trimec® to Use		Amount of water in sprayer	Area to be sprayed
(Tablespoons)	(Fluid Ounces.)	(Gallons)	(Square Feet)
4	2	1	670
12	6	3	2,000

NOTE: Whether using a hose end sprayer or pressure sprayer, avoid sprays which are too fine because they can drift and damage ornamental or garden plants.

HOW MUCH TO USE - SPOT SPRAY:

To spray small areas or individual weeds, do not use hose end sprayers. Mix 1 fluid ounces (2 tablespoons) in ½ gallon water in pressure sprayer and spray as required being certain to wet each weed.



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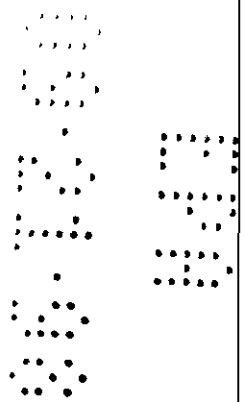
- CONTROLS -		
Bedstraw	Henbit	Poison oak
Black medic	Knotweed	Purslane
Buckhorn	Lambsquarters	Ragweed
Chicory	Lespedeza	Shepherdspurse
Chickweed	Mallow	Speedwell
Clover	Morningglory	Spurge
Dandelion	Peppergrass	Wild carrot
Dock	Pigweed	Wild lettuce
Ground ivy	Plantain	Wild onion
Healall	Poison ivy	Yarrow

LIMITED WARRANTY AND DISCLAIMER.

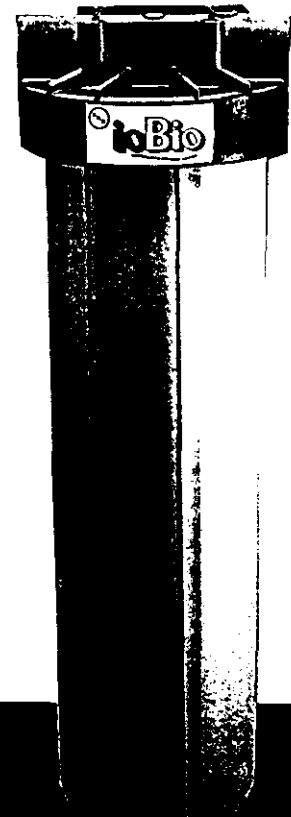
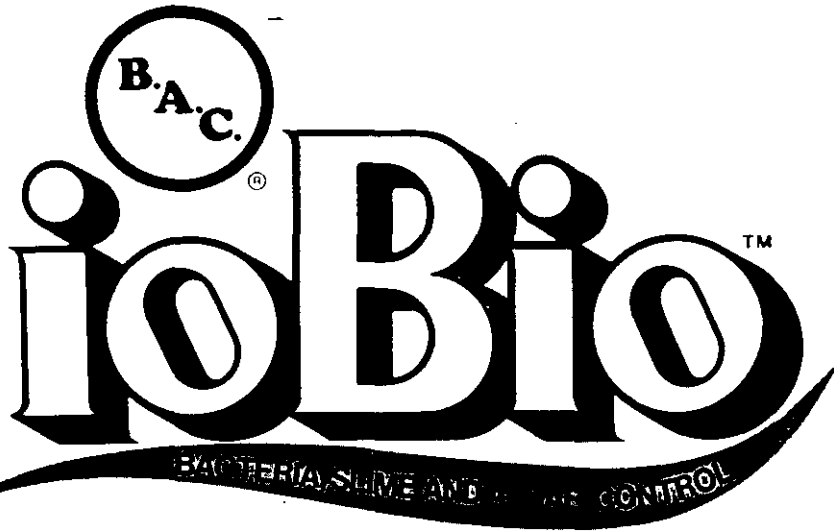
The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

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.



4041



Installation, Operation and Maintenance Manual

DESCRIPTION

The IOBIO™ Bacteria, Slime and Algae Control* provides a simple and reliable means of controlling slime and algae often found in evaporative cooling systems. It is easy to use and requires little maintenance. By delivering very low concentrations of iodine, the IOBIO™ Control automatically controls unwanted microbiological contaminants in the open system. It is a simple, effective method of biological water treatment.

The information contained in this manual will enable the user to effectively install, operate, and maintain the IOBIO™ Control. It is important to follow these instructions to obtain the design performance from the device.

The IOBIO™ Control is installed in the make-up water piping to the cooling tower, evaporative condenser, or evaporative fluid cooler. The IOBIO™ Control is constructed of two primary components, a permanent upper housing and a replaceable lower iodine canister. When properly selected, the iodine canister contains a quantity of elemental iodine designed to last a full operating season. Since the exact duty cycle will vary on each application, it is suggested the IOBIO™ Control be monitored during the first season of use, and a replacement canister size be ordered that best matches the desired replacement interval.

The IOBIO™ Control is compatible with both alkalinity and acidity, and the dissolved mineral levels and temperatures commonly found in open recirculating water systems which cool air-conditioning and industrial processes.

Additional water treatment may be required if corrosive and/or scaling conditions exist. The services of a competent water treatment specialist should be obtained for specific water treatment recommendation in these instances. Any corrosion and scale inhibitors used must be compatible with halogen biocides.

*Patent Pending

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NOTICE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not use this product with air washers or direct evaporative coolers used for human comfort cooling.