UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 2217-507 3/3/2000 Page 13

MAR 3 2000

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

Dear Mr. Martens:

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Subject: Revised Labeling - Clarification of Directions for Use Gordon's Broadleaf & Dandelion Lawn Weed Killer EPA Registration No. 2217-507 Your Submission Dated February 25, 2000

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) Since this product is packaged in containers no greater than 2 ½ gallons in size, the statement regarding containers of 5 gallons or more present in the Engineering Control Statement should be deleted.
- 2) To avoid redundancy, the statements concerning washing personal protective equipment may be deleted from the Engineering Control Statement since they are also present in the Personal Hygiene Statement.

3) Delete the phrase "For terrestrial uses..." from the beginning of the third sentence in the Environmental Hazards section.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

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SURNAME +	D. KENNY					
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EPA Form 1320-1 (12-70)

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The Agency has recently revised its recommended First Aid statements for pesticide products and intends to issue a PR Notice announcing the changes in the near future. In the interim we are encouraging registrants to begin using the new statements. The new statements were developed as part of the Consumer Labeling Initiative in close cooperation with poison control center personnel and other medical experts. While it is not mandatory that you revise your label at this time, you are strongly encouraged to substitute the revised statements (below) for those statements currently on the label at your next label printing:

If swallowed:	 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 by a poison control center or doctor.
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. Call a poison control center or doctor for treatment advice.
If on skin:	 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:	 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 further treatment advice.

"FIRST AID

Have the product container or label with you when calling a poison control center or doctor or going for treatment."

Sincerely yours,

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

Enclosure

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GORDON'S BROADLEAF AND DANDELION LAWN WEED KILLER

with COMMENTS In EPA Letter Dated З

MAR 3 2000

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

ACTIVE INGREDIENTS:	
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:	<u>81.7%</u>
TOTAL	100.0%
US DOODUCT CONTAINS.	

THIS PRODUCT CONTAINS: 0.31 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 3.6% 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 PBI/GORDON CORPORATION **CONTAINS SINGLE ISOMER FORM OF MECOPROP-p**

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KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for Precautionary Statements.

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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 leng-sleeved shirt, long pants, socks, shoes and rubber gloves.

Personal Hygiene Statement:

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 Statement:

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 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.

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.

First Aid

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

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

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 washwater.

Cleaning of Equipment: 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 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.

STORAGE & DISPOSAL

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

STORAGE: Store in original container in a locked storage area. 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: <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 if allowed 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. If burned stay out of smoke.

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Cleaning of Spray Equipment:

Immediately clean sprayer with soap or detergent and water and rinse thoroughly before applying other pesticides.

SITES:

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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 for use in ornamental lawns and turf established in institutional, ornamental, and residential/domestic sites. <u>Institutional sites</u>: 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, and golf courses. <u>Ornamental sites</u>: turfgrass established around residences, parks, streets, retail outlets, cemeteries, and institutional buildings. <u>Residential/domestic sites</u>: 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.

ESTABLISHED TURFGRASS (LAWNS) THAT MAY BE TREATED:

Northern Grasses - Kentucky bluegrass, perennial ryegrass, bentgrass, and fescues.

Southern Grasses - St. Augustinegrass, centipedegrass, bahiagrass, bermudagrass, and zoysiagrass.

Spot treatments may be appropriate for sparse weed infestations or as a follow-up treatment for dense weed infestations. Only spot treatments are recommended for St. Augustinegrass, bentgrass, and centipedegrass.

HOW MUCH TO USE - BROADCAST APPLICATIONS:

Broadcast applications and spot treatments provide broadleaf weed control in warm season and cool season turfgrass. This product can be applied in both dormant and growing seasons of turfgrass. The best control of weeds in established turf will be obtained from spring or early fall applications when weeds are actively growing.

Additional applications may be required for some weed species. If necessary, repeat the application at 14 to 21 days after the first application or when regrowth of the weed species is noted.

	Amount of Pro	duct To Use
Type of Applicator	Pounds of Product/Acre	FI.Oz. of Product /1,000 sq.ft.
ENGINE DRIVEN PUMP SPRAYERS: power sprayer equipped with hand-held spray gun or power spray equipment fitted with a spray boom.	8.2 pints/Acre	3.0 fl.oz./1,000 sq.ft.
HAND OPERATED SPRAYERS: backpack, knapsack, compression, or plunger sprayers.		3.0 fl.oz./1,000 sq.ft.
HOSE END SPRAYERS:		3.0 fl.oz./1,000 so,ft.
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The maximum application rate to turf is 1.0 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. Do not exceed dosages for any area.

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SPOT TREATMENTS:

Applications should be made on a spray-to-wet basis with uniform coverage. Prepare the spray solution by mixing in water according to Table 2.

ORNAMENTAL TURFGRASS ESTABLISHED IN LAWNS:

Kentucky Bluegrass, Perennial Ryegrass, Fescues, Bahiagrass, St. Augustinegrass, Centipedegrass, Bentgrass, Bermudagrass, and Zoysiagrass: Use a 1½% spray concentration or mix 2 fluid ounces of product with one gallon of water.

Woody Plants, Vacant Lots, Fence Rows: Use a 11/2 - 21/2% spray concentration or mix 1.9 - 3.2 fluid ounces of product with one gallon of water.

Desired Volume,	Spray Concentration, % vol/vol				
Gallons	1½%	2.0%	2.5%		
1.0 gallon	1.9 fl.oz.	2.5 fl.oz.	3.2 fl.oz.		
2.0 gallons	3.8 fl. oz.	5.1 fl.oz.	6.4 fl.oz.		
3.0 gallons	5,8 fl.oz.	7.7 fl.oz.	9.6 fl.oz.		
10.0 gallons	19.2 fl.oz.	25.6 fl.oz.	32.0 fl.oz. (1.0 quart		
40.0 gallons	76.8 fl.oz.	102.4 fl.oz.	128.0 fl.oz. (1.0 gallor		

TABLE 2. SPRAY PREPARATION FOR SPOT TREATMENTS.

Equal	1 Tablespoon (tbsp.) = 3 teaspoons (tsp.) = 1/2 fluid ounce (fl.oz.)
Measures:	1 Cup = 16 tbsp. = 8 fl.oz. = ½ pint (pt.)
	1 Pint (pt.) = 16 fl.oz.
	1 US Gallon (gal.) = 4 quarts (qts.) = 8 pts.

APPLICATION INFORMATION AND USE PRECAUTIONS:

- Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants.
- Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.
- Do not exceed specified dosages for any area.

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- Do not apply to newly seeded lawns until well established or after two to three mowings.
- Seed can be sown 3 to 4 weeks after herbicide application.
- Do not apply this product through any type of irrigation system.
- Do not apply to garden plants, flowers or shrubs.
- 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.

This product is effective on 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.

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- BROADLEAF WEEDS -

Annual yellow sweetclover Aster Austrian fieldcress Bedstraw Beggarticks Betony, Florida Bindweed, field Bird vetch Bitter wintercress Bittercress, hairy Bitterweed Black-eved 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, crimson Clover, hop Clover, red Clover, strawberry Clover, sweet Clover, white

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Cockle Cocklebur Common mullein Creeping jenny Cudweed Curly dock Daisy, English Daisy fleabane Daisy, oxeye Dandelion Dichondra Dogbane Dogfennel Dollarweed Elderberry False dandelion Falseflax False sunflower Fiddleneck Florida pusley Frenchweed Galinsoga Goathead Goldenrod Ground ivv Gumweed Hairy fleabane Hawkweed Healall Heartleaf drymary Heathaster Hedge bindweed Hedge mustard Hemp Henbit Hoary cress Hoary plantain Hoary vervain Horsenettle Jimsonweed Knawel Knotweed Kochia Lambsquarters Lespedeza Mallow Matchweed Mexicanweed Milk vetch Morningglory Mouseear hawkweed Musk thistle Mustard Narrowleaf plantain Narrowleaf vetch Nettle Orange hawkweed Oriental cocklebur Oxalis Parsley-piert Parsnip Pearlwort Pennycress Pennywort Peppergrass Pepperweed Pigweed Pineywoods bedstraw Plains coreopsis (tickseed) Plantain Poison ivy Poison oak Pokeweed Poorioe Prairie sunflower Prickly lettuce Prickly sida Prostrate knotweed Prostrate pigweed Prostrate spurge Prostrate vervain Puncturevine Purslane, common Ragweed Red sorrel Redroot pigweed Redstem filaree Rough cinquefoil Rough fleabane Russian pigweed Russian thistle Scarlet pimpernel Scotch thistle Sheep sorrel Shepherdspurse Slender plantain Smallflower galinsoga Smooth dock Smooth pigweed Sorrel Sowthistle Spanishneedles

Spiny amaranth Spiny cocklebur Spiny sowthistle Spotted catsear Spotted spurge Spurweed Stinging nettle Strawberry, India mock Tall nettle Tall vervain Tansy ragwort Tansy mustard Tanweed Thistle Trailing crownyetch 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 Woolfy croton Woolly morningglory Woolly plantain Wormseed Yarrow Yellow rocket Yellowflowespepperweed and other broadleaf weeds

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Mugwort

Speedwell

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See Sulley and see Sulley and also

LIMITED WARRANTY AND DISCLAIMER.

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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.

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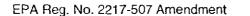
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THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the 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.



APPENDIX

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- I. Advertising claims that may be used by supplemental registrants. These claims may be presented on the retail container label or on the labeling accompanying the product.
 - ◆ Contains Trimec[®] Herbicide
 - Controls (Kills) (desired weed species from attached listing may be inserted here e.g. dandelion, henbit, knotweed, plantain, poison ivy, spurge,) and other broadleaf weeds.
 - Keep from freezing

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• Covers 10,800 square feet

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