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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 3 2001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Craig Martens
PBI Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Trimec 891 Broadleaf Herbicide
EPA Registration Number: 2217- 517
Your Submission Dated June 5, 2001

The Agency is conditionally approving an amendment to the registration for 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 for 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 Statements of Formula (CSFs) submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to the product other than those specified within the body of your certification statement and cover letter dated June 5, 2001. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised CSFs (Basic and Alternate Formations dated June 1, 2001) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,



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

Enclosure

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TRIMEC® 891 BROADLEAF HERBICIDE

For use by individuals/firms licensed or registered by the State to apply pesticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the pest control regulatory agency of your State prior to use of this product.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	30.56%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid ..	8.17%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	2.77%
INERT INGREDIENTS:.....	58.50%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

2.38 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 25.38%
 0.63 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 6.75%
 0.21 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 2.30%
 Isomer Specific by AOAC Method.
 Contains single isomer form of Mecoprop-p.
 TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

ACCEPTED
with COMMENTS
In EPA Letter Dated:
 AUG 3 2001
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

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

Statement of Practical Treatment

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

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash skin with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. See side panels for additional Precautionary Statements

- KEEP FROM FREEZING -

NET CONTENTS: 55 U.S. GALLONS

891/
 EPA Reg. No. 2217-517 Amend
 EPA Est. No. 2217-KS-1
 MANUFACTURED BY:



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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Causes skin irritation. Do not get into eyes, on skin, or on clothing. May be fatal if swallowed.

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 in capacity: 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. (*Note: This is not an option in California, see Calif. Code of Regulations, Article 2, Section 6746*). 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.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse. 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. (*Note: This is not an option in California, see Calif. Code of Regulations, Article 2, Section 6746*). 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.

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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.
- ◆ Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- ◆ 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. Do not apply when weather conditions favor drift from target area.

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.

SOD FARMS:

Trimec® 891 Broadleaf Herbicide is intended for use on sod farms. Trimec® 891 Broadleaf Herbicide provides selective broadleaf control in warm season and cool season turfgrass established for commercial sod production.

APPLICATION SCHEDULES FOR SOD FARMS:

Apply Trimec® 891 Broadleaf Herbicide to broadleaf weeds that are actively growing. Follow-up applications may be required for dense infestations of perennial and biennial weeds. Do not apply this product to 'Floritam' St. Augustinegrass.

NEWLY SEEDED AREAS:

The application of Trimec® 891 Broadleaf Herbicide to grass seedlings is recommended after the second mowing

NEWLY SODDED, SPRIGGED, OR PLUGGED AREAS:

The application of Trimec® 891 Broadleaf Herbicide to newly sodded, sprigged, or plugged grasses should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations. Also, applications to dormant bermudagrass, dormant zoysiagrass, and dormant bahiagrass are suggested.

APPLICATION RATES FOR SOD FARMS:

Dosage rates and spray volume recommendations of Trimec® 891 Broadleaf Herbicide for use in commercial sod production 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 1.3 pounds 2,4-D acid equivalent per acre per application per site.

TABLE 1. RATE RECOMMENDATIONS FOR SOD FARMS.

Species	Amount of Product	Spray Volume
	Pints/Acre	Gallons/Acre
Cool Season Turf		
Kentucky Bluegrass	3.0 to 4.0	5 to 175
Perennial Ryegrass	3.0 to 4.0	5 to 175
Fescue <i>spp.</i>	3.0 to 4.0	5 to 175
Creeping Bentgrass	1.8	5 to 175
Warm Season Turf		
Common Bermudagrass	2.0 to 2.5	5 to 175
Hybrid Bermudagrass	2.0 to 2.5	5 to 175
Bahiagrass	2.0 to 2.5	5 to 175
Zoysiagrass	2.0 to 2.5	5 to 175
St. Augustinegrass	2.0 to 2.5	5 to 175

USE PRECAUTIONS AND LIMITATIONS FOR SOD FARMS:

1. Do not apply this product through any type of irrigation system.
2. Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour spray solutions near these plants.
3. Delay mowing 1 to 2 days before and after the application of this product.
4. Do not apply this product immediately before rainfall or irrigation. Do not irrigate or water the turfgrass within 24 hours after application.
5. Treated areas may be reseeded 3 to 4 weeks after application.

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 or dust has settled.

ORNAMENTAL LAWNS AND TURFGRASS:

WHERE TO USE:

Trimec® 891 Broadleaf Herbicide 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. 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.

WEEDS CONTROLLED:

Trimec® 891 Broadleaf Herbicide is especially effective against weeds such as sheep sorrel, knotweed, spotted spurge, chickweed, oxalis and henbit. A partial list of broadleaf weeds controlled is listed below:

Bedstraw	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

HOW MUCH TO USE:

The maximum application rate to turf is 1.3 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.

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For Kentucky Bluegrass, Fescue spp., Perennial Ryegrass, Bermudagrass and Zoysiagrass:

Apply 3.25 to 4.0 pints of Trimec® 891 Broadleaf Herbicide per acre with spray volumes ranging from 5 to 220 gallons per acre. Or, apply 1.2 to 1.5 fluid ounces of Trimec® 891 Broadleaf Herbicide per 1,000 square feet with spray volumes ranging from 0.5 to 5.0 gallons per 1,000 square feet of turf. Do not irrigate within 24 hours of application. The best time to control clover is in the fall. When making a spring application to control clover a 4 pints per acre rate is recommended.

For Bentgrass:

Apply a maximum rate of 1.8 pints of Trimec® 891 Broadleaf Herbicide per acre with spray volumes greater than 145 gallons per acre. The equivalent application rate would be 1.0 fluid ounce of Trimec® 891 Broadleaf Herbicide mixed with 5.0 gallons of water and applied to 1,500 square feet.

Note: Schedule applications during May or mid-August through September. Slight turf yellowing will disappear after about one week. Care should be taken to avoid overdosing bentgrass or injury may result. High spray volumes will provide uniform coverage.

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 pour spray solution near these plants.
- ◆ Some hybrid bermudagrass may be sensitive to this product. Contact your local Extension Service Weed Control Specialist. Do not spray on carpetgrass, dichondra nor lawns or turf where desirable clovers are present. Clover present will be damaged if sprayed.
- ◆ Do not apply this product to St. Augustinegrass or centipedegrass during spring green-up which is the transition period between dormancy and active growth. Turfgrass injury can be expected when used on centipedegrass or St. Augustinegrass lawns; spot spray weeds only on these types of grasses.
- ◆ Use only lawn type sprayers. Coarse sprays are less likely to drift. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species.
- ◆ Do not apply to newly seeded grasses until well established. Do not apply to newly seeded turf until after the second or third mowing.
- ◆ Avoid applying during long excessively dry or hot periods unless adequate irrigation is available. 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 the recommended rates.
- ◆ Do not contaminate domestic or irrigation water.
- ◆ After using this product, clean sprayer with soap, detergent, or a spray tank cleaner and water, and rinse thoroughly with water before applying other pesticides.
- ◆ Failure to observe the above precautions may result in injury.

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: *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.

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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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APPENDIX

- 1. 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.
- ◆ Controls dandelion, chickweed, knotweed, plantain, henbit, spurge and many other species of broadleaf weeds.
 - ◆ One gallon covers 2 to 2½ acres.
 - ◆ Low odor formulation. Notification of 081799