

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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

OCT 3 D 2000

Dear Mr. Martens:

Subject: Trimec Broadleaf Herbicide, Bentgrass Formula EPA Registration No. 2217-529

Application Dated October 13, 2000, Request To Amend Registration To Add Advisory Statement "Do not apply this product to 'Floratam' St. Augustinegrass." and "Cultivars vary in tolerance to this product."

Your request to amend the registration of the subject pesticide product has been reviewed and found acceptable under Section 3 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, provided that you:

- 1. Delete the claim: "Cultivars vary in tolerance to this product", as it is confusing. If there are cultivars of turf grasses that should not be treated because they are not tolerant, you should clearly state their names as you did for "Floratam" St. Augustinegrass.
- 2. As the "Limited Warranty and Disclaimer" section of the label clearly states remedies if this product causes any damages when used as directed or in the handling of the product, you should add a statement that the product should be returned in case the purchaser decides that he/she can not use the produce as described on the labeling. A copy of the Uniform Commercial Codes that are applicable to the remedies claimed are enclosed with an example of an acceptable warranty with limitations of remedies.
- 3. Submit one (1) copy of the final printed label prior to your shipment of the subject pesticide product under the enclosed stamped label.

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If these conditions are not complied with, this registration will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment of this product under the subject labeling reflecting the above comments constitutes acceptance of these conditions.

A stamped copy of the proposed label is enclosed with your records.

Sincerely yours,

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

Enclosures (3)

TRIMEC® BROADLEAF HERBICIDE BENTGRASS FORMULA

2.5 GALLONS COVERS UP TO 7.25 ACRES

Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge, and many other broadleaf weeds.

- KEEP FROM FREEZING -

ACTIVE INGREDIENTS:

Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid	19.84%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	6.12%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)	2.53%
INERT INGREDIENTS:	<u>71.51%</u>
TOTAL Y	10000

TOTAL

100.00%

THIS PRODUCT CONTAINS:

1.46 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 16.40%.

 $0.45\ lbs.\ 2,4\mbox{-dichlorophenoxyacetic}$ acid equivalent per gallon or 5.08%

0.19 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 2.10%

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 3 D 2000

Under the Federal Insecticide, Fundicide, and Rodemicide Act as amended, for the pesticide registered under EPA Reg. No.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Statement of Practical Treatment

In case of contact, wash skin with plenty of soap and water.
For eyes, flush with water for 15 minutes and get medical attention.
See side panel for additional Precautionary Statements.

NET CONTENTS: 2½ U.S. GALLONS 840 APXXXXXX EPA REG. NO. 2217-529 EPA Est. No. 2217-KS-1 MANUFACTURED BY: CORPORABILION As Employee-Owned Company 1217 West 12th Street Kanass City, Mesouri 64101



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 skin, eyes or clothing. When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant 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.

Engineering Control Statements:

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. If the contents of a nonrefillable 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 washwater. Do not apply when weather conditions favor drift from target area.

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 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.

For use on residential and other turf sites excluding sod farms.

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 of 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: 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 activities authorities, by burning. If burned stay out of smoke.

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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. Do not spray on carpetgrass, dichondra nor lawns or turf where desirable clovers are present. 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 spray while grass is emerging from dormancy. Do not apply to newly seeded grasses until well established. Do not spray when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application. Do not contaminate domestic or irrigation waters. Some injury can be expected to turf when used on centipedegrass or St. Augustinegrass lawns; only spot spray weeds only on these types of grasses. Clover present will be damaged if sprayed. After using this product, clean sprayer with soap or detergent and water, and rinse thoroughly before applying other pesticides. Failure to observe the above precautions may result in injury.

ORNAMENTAL LAWNS AND TURF:

Bentgrass, Centipedegrass, St. Augustinegrass, and Buffalograss -

Apply Trimec[®] Bentgrass Formula at 3 to 4 pints of product per acre (1.1 - 1.5 fl.oz./1,000 sq. ft.) in sufficient water for uniform coverage. If hardy weeds persist, make a second application after three weeks. Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid applying during long excessively dry or hot periods unless adequate irrigation is available. If application is made when soil is quite warm, use reduced rates to reduce potential injury. Do not irrigate within 24 hours of application. Do not apply to newly seeded turf until the second or third mowing. Seed can be sown 3 to 4 weeks after herbicide application. Do not use on dichondra. Cultivars vary in tolerance to this product. Do not apply the product to 'Floratam' St. Augustinegrass.

If dandeiions persist spot treatments with a single nozzle hand sprayer are recommended. Do not overdose bentgrass. In closely mowed bentgrass (putting and bowling greens) apply Trimec[®] Bentgrass Formula at a maximum rate of 1 fl.oz. of product per 1,000 square feet preferably in May or through September. Any yellowing will disappear after about one week.

For hard-to-kill summer weeds, use 6 pints of product per acre. Do not apply this rate to bentgrass, centipedegrass or St. Augustinegrass.

The maximum application rate to turf is 0.4 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.

Note: Care should be taken to avoid overdosing bentgrass or injury may result. High spray volumes will aid in obtaining uniform coverage. If hand type sprayers are used, it is preferable to use a single nozzle sprayer rather than a multiple nozzle boom. Sweeping movements with a multiple nozzle boom will result in heavy over-application and subsequent turf discoloration or injury.

WEEDS CONTROLLED:

Trimec® Bentgrass Formula is especially effective against weeds such as sheep sorrel, knotweed, spotted spurge, chickweed, oxalis, and henbit. Broadleaf weeds are listed below.



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

^{*}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.