

2217-529

12/02/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

James Kunstman, Ph.D.  
PBI/Gordon Corporation  
1217 West 12<sup>th</sup> Street  
Kansas City, MO 64101

DEC - 2 2009

Subject: Label Amendment: Response to RED letter dated February 10, 2009  
Product Name: Trimec Broadleaf Herbicide Bentgrass Formula  
EPA Reg. No. 2217-529  
Amended label submission dated: 7/31/09

Dear Dr. Kunstman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following changes before you release the product for shipment.

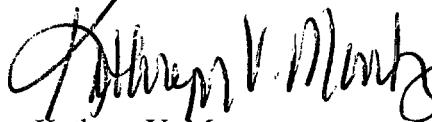
- a. Per the label review manual, products subject to the WPS that are classified as toxicity category II must also bear the following Spanish signal word and Spanish statement:  
"AVISO" must follow the signal word "WARNING"  
*"Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)"* must be added below the signal word.
- b. Per the acute toxicity review, revise the Hazards to Humans and Domestic Animals statement to read as follows:  
"WARNING  
Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if absorbed through skin or if swallowed. Avoid contact with skin. Wear protective eyewear.
- c. Per the 2,4-D RED, revise "protective eyewear" to "goggles or face shield" in the personal protective equipment section.

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EPA Reg. No. 2217-529  
Response to RED letter dated 2-10-09

A stamped copy of your labeling is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after the next printing must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. Amended labeling will supercede all previously accepted ones.

Sincerely,



Kathryn V. Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

Enclosure

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

DEC - 2 2009  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

2217-529

# TRIMEC® BROADLEAF HERBICIDE BENTGRASS FORMULA

## EPA Reg. No. 2217-529

### ACTIVE INGREDIENT:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	9.92%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid .....	6.12%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid) .....	2.53%
INERT INGREDIENTS: .....	<u>81.43%</u>
TOTAL .....	100.00%

### THIS PRODUCT CONTAINS:

- 0.71 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 8.20%.
- 0.44 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 5.08%
- 0.18 lb 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

### KEEP OUT OF REACH OF CHILDREN

## CAUTION- WARNING

**STOP! 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. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.~~

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are natural rubber. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators and other handlers must wear:

- protective eyewear
- long-sleeved shirt and long pants,
- shoes and socks, ~~plus~~
- chemical-resistant gloves (except for applicators using ground boom equipment) and



- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

**User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

<b>User Safety Recommendations</b>	
<ul style="list-style-type: none"> <li>• Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.</li> <li>• Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.</li> <li>• 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.</li> </ul>	

<b>First Aid</b>	
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.	
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.	

**Environmental Hazards**

This pesticide ~~may be~~ is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**GENERAL PRECAUTIONS AND RESTRICTIONS:**

- Do not enter or allow people (or pets) to enter the treated area until sprays have dried.

- 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.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

**USE PRECAUTIONS:**

Do not apply this product through any type of irrigation system. Do not spray on carpetgrass, dichondra nor lawns or turf where desirable clovers are present. Use only lawn type sprayers. Do not exceed specified dosages for any area. 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. 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 and detergent and water, and rinse thoroughly before applying other pesticides. Failure to observe the above precautions may result in injury.

Do not use this product on or near desirable plants, including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs, since injury may result.

**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 to 1.5 fl.oz./1,000 sq.ft.) in sufficient water for uniform coverage. If hardy weeds persist, make a second application after 30 days. 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. Do not apply this product to 'Floritam' St. Augustinegrass.

If dandelions 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.

**Limitations on broadcast treatments for ornamental turfgrass:**

The maximum application rate is 6.0 pints of product per acre per application (0.33 lb 2,4-D ae, 0.53 lb MCP-P ae, and 0.14 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 12.0 pints of product per acre (0.66 lb 2,4-D ae, 1.07 lb MCP-P ae, and 0.28 lb dicamba ae per acre), excluding spot treatments.

**Limitations on spot treatments to residential turfgrass:**

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 1.5 fl.oz. per 1,000 sq.ft. per application (0.36 lb MCP-P acid equivalent per acre). The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

**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.

**Spray Drift Management**

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

**Droplet Size**

Use only Medium or coarser spray nozzles according to ASAE (S 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

**Wind Speed**

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

**Temperature Inversions**

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

**Susceptible Plants**

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

**Other State and Local Requirements**

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

**Equipment**

All ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates. Do not apply with a nozzle height greater than 4 feet above the target site.

**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.

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

BROADLEAF WEEDS			
Curly dock	Healall	Puncturevine	Yarrow
Dandelion	Henbit	Purslane	Yellow rocket
Dayflower	Lambsquarters		
*Synonyms			

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in original container in a locked storage area inaccessible to children or 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 and local authorities, by burning. If burned stay out of smoke.~~

**[For Plastic Containers – Nonrefillable with capacities equal to or less than 5 gallons:]**

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

**[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]**

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate

for later use or disposal. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

**[For Refillable Containers:]**

**CONTAINER HANDLING:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Container cleaning: Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

**LIMITED WARRANTY AND DISCLAIMER**

FOR USE ONLY AS DIRECTED.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

**APPENDIX**

**1. Statements which may appear on different label components depending on packaging configuration.**

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: \_\_\_\_\_
- EPA Est. No. \_\_\_\_\_

**2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:**

- 2.5 Gallons Covers Up To 7.25 Acres
- Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge, and many other broadleaf weeds.
- KEEP FROM FREEZING

