



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

OCT 29 1998

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p  
Gordon's Broadleaf Herbicide  
EPA Registration Number: 2217-530  
Your Submission Dated September 02, 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(s) 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(s) 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 09/02/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

McCee  
10-29-98

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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

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# GORDON'S BROADLEAF HERBICIDE

A TRIMEC® TURF HERBICIDE FORMULATION

Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge,  
and many other broadleaf weeds including those shown on the side panel.

ONE GALLON COVERS UP TO FOUR ACRES

-KEEP FROM FREEZING-

**ACTIVE INGREDIENTS:**

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid .....	30.21%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid .....	16.22%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid ..	8.11%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	4.05%

<b>INERT INGREDIENTS:</b> .....	49.52%
<b>INERT INGREDIENTS</b> .....	57.63%
<b>TOTAL</b>	<b>100.00%</b>

**THIS PRODUCT CONTAINS:**

- 2.42 2.36 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 25.10%.
- 1.29 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 13.40%.
- 0.63 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 6.70%
- 0.32 0.31 lb. 3,6-dichloro-o-anisic equivalent per gallon or 3.36%.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.  
Isomer Specific by AOAC Methods.

**CONTAINS SINGLE ISOMER FORM OF MECOPROP-p**

## KEEP OUT OF REACH OF CHILDREN

## DANGER

**Statement of Practical Treatment**

**IF IN EYES:** In case of eye contact, immediately flush eyes with plenty of water for 15 minutes. Call a physician at once.

**IF SWALLOWED:** Drink one or two glasses of water, induce vomiting by touching back of throat with finger. Call a physician at once. Do not induce vomiting or give anything by mouth to an unconscious person.

**IF INHALED:** Remove victim to fresh air and apply respiration if necessary.

**IF ON SKIN:** Wash promptly with soap and water. Rinse thoroughly.

### NET CONTENTS ONE U.S. GALLON

839 APXXXXXX  
EPA Reg. No. 2217-530  
EPA Est. No. 2217-KS-1  
MANUFACTURED BY:



ACCEPTED  
with COMMENTS  
In EPA Letter Dated

OCT 29 1998

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
2217-530

4 2 6



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

**PRECAUTIONARY STATEMENTS**

**Hazards To Humans & Domestic Animals**

**DANGER:** Corrosive. Causes eye damage. Do not get in eyes, on skin or clothing. 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. Wear face shield or goggles when mixing, loading or applying this product. If eye exposure occurs get immediate medical attention. Avoid inhalation of spray mist. Harmful or fatal if swallowed.

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:** A mechanical system (probe and pump) 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 contaminate domestic or irrigation waters. 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**

**FOR USE ON RESIDENTIAL AND OTHER TURF SITES EXCLUDING SOD FARMS.**

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

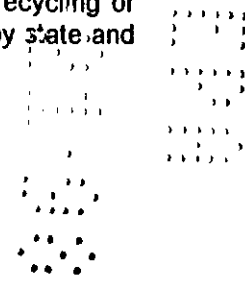
Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has settled.

**STORAGE & DISPOSAL**

**STORAGE:** Store in original container in a locked storage area inaccessible to children or pets.

**PESTICIDE DISPOSAL:** Do not contaminate water, food, or feed by storage or 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:** 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.



**USE PRECAUTIONS:**

1. Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants.
2. Do not pour spray solution near these plants.
3. Do not spray on carpetgrass, dichondra or lawns or turf where desirable clovers are present.
4. Use only lawn-type sprayers.
5. Note: Coarse sprays are less likely to drift.
6. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within dripline of trees and other ornamental species.
7. Do not spray while grass is emerging from dormancy.
8. Do not apply to newly seeded grasses until well established.
9. Do not apply when air temperature exceeds 85°F.
10. Seed can be sown 3 to 4 weeks after application.
11. Do not contaminate domestic or irrigation waters.
12. Some injury can be expected to turf when used on centipede or St. Augustinegrass.
13. After using this product, clean sprayer with soap or detergent and water, and rinse thoroughly before applying other pesticides.
14. Failure to observe the above precautions may result in injury.
15. Do not apply this product through any type of irrigation system.

**ORNAMENTAL LAWNS & TURF (OTHER THAN BENTGRASS):**

Apply at the rate of 2 to 3 pints per acre in sufficient water for adequate coverage. Use the higher rate in heavy weed growth or on older weeds, or, during periods of poor growth. Maximum weed control will be obtained from spring or early fall application when weeds are actively growing. Spray when average temperatures are 50°F or higher. Avoid applying during long, excessively dry or hot periods unless adequate irrigation can be supplied. Do not irrigate within 24 hours of application. Do not apply to newly seeded turf until after the second or third mowing. Grass seed can be sown 3 to 4 weeks after application at recommended rate. Do not use on dichondra, carpetgrass or St. Augustinegrass.

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

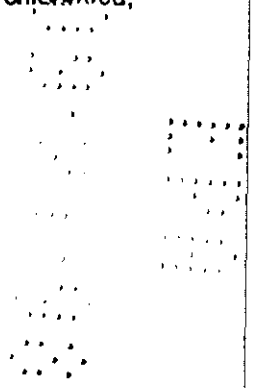
**BENTGRASS TURF:**

In closely-mowed bentgrass (putting and bowling greens) apply at a maximum rate of ½ fluid ounce per 1,000 square feet preferably in May, or mid-August through September. Slight turf yellowing will disappear after about one week.

**NOTE:** Care should be taken to avoid overdosing bentgrass or injury may result. Large volumes of spray water (i.e. 1 gallon per 250 or 300 square feet) will aid in obtaining uniform coverage. If hand operated sprayers are used, it is best to use a single nozzle sprayer rather than a multiple nozzle boom. Sweeping movements with a multiple nozzle boom will result in heavy local over-application and subsequent turf discoloration or injury.

**WEEDS CONTROLLED:**

This product is especially effective against hard-to-kill weeds such as sheep sorrel, spotted spurge, oxalis, poison ivy and poison oak. In addition, it kills sensitive weeds such as dandelion, chickweed, plantain and ragweed. A more complete list is shown below.



Bedstraw	Knotweed	Ragweed
Black medic	Lambsquarters	Sheep sorrel
Buckhorn	Lespedeza	Shepherdspurge
Burdock	Mallow	Speedwell
Chickweed	Morningglory	Spurge
Chicory	Peppergrass	Thistle
Clover	Pigweed	Wild carrot
Dandelion	Plantain	Wild garlic
Dock	Poison ivy	Wild lettuce
Ground ivy	Poison oak	Wild onion
Healall	Purslane	Yarrow
Henbit		

**LIMITED WARRANTY.**

Manufacturer warrants that the chemical composition conforms to the ingredient statement given on the label and that this product is suited for the labeled use when applied according to label directions. Because of widely varying use conditions, it is impossible to eliminate all risks even when label directions are followed.

EXCLUSION OF OTHER WARRANTIES AND REMEDIES. Except where such disclaimers and exclusions are specifically prohibited by applicable law. THE FOREGOING IS THE ONLY GUARANTEE OR WARRANTY APPLICABLE TO THIS PRODUCT AND IS GIVEN EXPRESSLY AND IN LIEU OF ALL OTHER WARRANTIES EXPRESSED OR IMPLIED, OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND ALL SUCH WARRANTIES WHICH EXCEED OR DIFFER FROM SAID LIMITED WARRANTY ARE DISCLAIMED BY MANUFACTURER, and, upon Manufacturer's compliance with said limited warranty, BUYER SHALL HAVE NO REMEDY AGAINST MANUFACTURER FOR ANY TYPE OF DAMAGE OR LOSS, and, IN NO EVENT SHALL MANUFACTURER BE LIABLE FOR CONSEQUENTIAL DAMAGE OR LOSS.