



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 15 2004

James L. Kunstman
PBI/Gordon Corp
1217 West 12th Street, P.O. Box 014090
Kansas City, MO 64101-0090

Dear Mr. Kunstman:

Subject: Conversion from MCPP to MCPP-p
Trimec 848 Herbicide
EPA Registration Number 2217-531 ✓
Your Submission dated August 5, 2004

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 Statements 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 Statements 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.

Copies of the revised Confidential Statements of Formula (Basic and Alternate Formulations, dated 08/02/04) 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 copy of your final printed labeling before you release the product for shipment.

Note: In the future (whenever there are multiple alternate CSFs), please designate with identification numbers (or letters) on the alternate CSFs, so it is easier to distinguish between the CSFs.

Sincerely yours,

/s/

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

Enclosure

TRIMEC® 848 HERBICIDE

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	33.87%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.	8.18%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	3.76%

INERT INGREDIENTS:.....	54.19%
TOTAL	100.00%

This Product Contains:

- 2.68 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 28.14%
- 0.64 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 6.76%
- 0.29 lbs. 3,6-Dichloro-o-anisic acid equivalent per gallon or 3.12%

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

Contains the single isomer form of Mecoprop-p.

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for additional Precautionary Statements and First Aid.

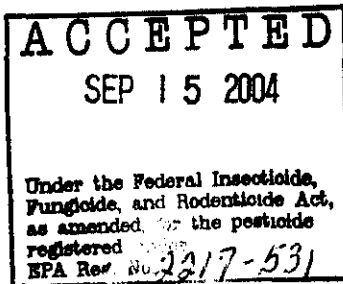
KEEP FROM FREEZING

NET CONTENTS 55 and 295 GALLONS

848 AP-----
 EPA REG. NO. 2217-531
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



Telephone: 816-821-7925





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

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PRECAUTIONARY STATEMENTS

Hazards to Humans and 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. Harmful or fatal if swallowed. Avoid breathing vapor.

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 container sizes 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.

For container sizes of 5 gallons or more: Do not open pour product from this container. A mechanical system (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.

First Aid

If in eyes:	<ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice.
If on skin:	<ul style="list-style-type: none"> • 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 swallowed	<ul style="list-style-type: none"> • 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 do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • 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 treatment advice.
<p>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.</p> <p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

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. 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 MCP-p have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCP-p 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.

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 or pets. Keep from freezing. To prevent cross contamination, do not store near other herbicides, fertilizers, insecticides, fungicides, or near seeds. Do not contaminate feed or foodstuffs.

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: 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.

SITES:

Trimec® 848 Herbicide is intended to be applied by lawn care operators and landscape personnel for use in ornamental lawns and turf established in ornamental sites. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial and institutional buildings. Cool season turfgrass species include Kentucky bluegrass, perennial ryegrass, and the fescues.

MIXING INSTRUCTIONS WITH WATER AS THE CARRIER

1. Prepare only the amount of spray mixture which can be used the day that it will be sprayed.
2. Fill the spray tank with 1/2 to 3/4 of the required amount of water and begin agitation. Sufficient agitation during mixing and application is essential.
3. Add Trimec® 848 Herbicide into the spray tank and maintain continuous agitation to avoid separation.
4. Fill the spray tank to 3/4 of the required amount of water. If tank mixtures are being prepared, add the companion product when the spray tank is approximately 3/4 full.
5. Finally, add the balance of the required water volume and maintain agitation prior to and during the application. Apply the spray mixture on the same day of spray preparation.

APPLICATION RATES FOR ORNAMENTAL TURFGRASS

For Kentucky bluegrass, Fescue spp., and Perennial Ryegrass:

The maximum application rate for established turfgrass is 1.0 pound 2,4-D acid equivalent per acre per application per site. The equivalent application rates are presented below:

Pounds of 2,4-D Acid Equivalent/Application	Maximum Application Rates of Trimec® 848	
	Pints/Acre	Fl. Oz./1000 Sq.Ft.
1.0	2.91	1.07

For selective broadleaf control in ornamental turf, apply a maximum of 2.91 pints of product per acre per application with spray volumes ranging from 20 to 220 gallons per acre. Or, apply a maximum of 1.07 fluid ounces of product per 1,000 square feet of turf per application with spray volumes ranging from 0.5 to 5.0 gallons per 1,000 square feet of turf.

The maximum number of broadcast applications per treatment site is two applications per year.

USE PRECAUTIONS:

Do not apply this product through any type of irrigation system. Avoid drift of spray mist to vegetables, flowers, ornamentals, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Do not spray on carpetgrass, dichondra, nor on 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 ornamentals and trees. Do not exceed specified dosages for any area. Be particularly careful within the dripline of trees and other ornamental species. Do not apply to newly seeded grasses until well established. 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 recommended rates.

TRIMEC® 848 CONTROLS:

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	Plantains	Wild Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow

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.