

2217-531

7/28/2008

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

OFFICE OF PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUL 28 2008

James L. Kunstman  
PBI/Gordon Corporation  
1217 West 12<sup>th</sup> St.  
Kansas City, MO 64101

Dear Dr. Kunstman:

Subject: RED Label Revision Amendment  
Trimec 848 Herbicide  
EPA Reg. No. 2217-531  
Submission dated February 27, 2008

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the following changes:

1. Under "Environmental Hazards";  
Add "Do not contaminate water when disposing of equipment washwaters or rinsate."
2. Under "Personal Protective Equipment";  
Change "Chemical-resistant gloves" to "chemical-resistant gloves made of any waterproof materials."
3. Under "Engineering Controls";  
Add "Protective eyewear and chemical-resistant gloves are required for the following operations" at the beginning of this paragraph.
4. Under "First Aid";
  - Change "If on skin" to "If on skin or clothing."
  - Interchange the sequence between "If on skin or clothing" and "If swallowed."
5. Under "Directions for Use – Limitations on broadcast applications on ornamental turfgrass";  
Delete "excluding spot treatment" from the footnote of the table.
6. Under "Limited Warranty and Disclaimer";  
Add "To the extent consistent with applicable law":
  - Before "By purchasing and using this product . . . all such risks' on the second paragraph.

- Before "Buyer and all users further agree . . . warnings and cautions."
- At the beginning of the last paragraph.

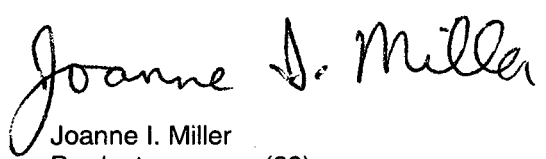
7. Add the following statements:

"Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for Injunctive relief in Washington Toxics Coalition et. al. v. EPA, C01-0132C, (W.D.W.A.)." For further information, please refer to <http://www.epa.gov/espp/>.

Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration."

The amended labels supersede all previously accepted labels. Stamped copies of the revised labels are enclosed for your records. Please submit copies of your final printed labels before you release the products for shipment.

Sincerely yours,



Joanne I. Miller  
Product manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure

# TRIMEC® 848 HERBICIDE

## EPA Reg. No. 2217-531

### ACTIVE INGREDIENT:

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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

JUL 28 2008

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

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

**KEEP FROM FREEZING**

2217-531

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**DANGER:** Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin or clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Harmful if swallowed, if absorbed through skin or if inhaled. Avoid breathing spray mist.

### Personal Protective Equipment

Some materials that are chemical-resistant to this product are natural rubber, natural rubber blends and laminates. 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.

See engineering controls for additional requirements.



### 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 the product's concentrate. Do not reuse them.

### 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.

### User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- 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.
- 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.

### First Aid

<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 on skin:</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>
<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 inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<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><b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

### Environmental Hazards

This pesticide may be 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.

### 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. 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.
2. Add Trimec® 848 Herbicide into the spray tank and maintain continuous agitation to avoid separation.
3. 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.
4. 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:

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.

Limitations on broadcast applications to ornamental turfgrass.					
Use Site	Maximum Rate per Application	Maximum Number of Applications per Year	Minimum Interval Between Applications	Minimum Spray Volume	Maximum seasonal rate
Ornamental turfgrass	2.91 pints/A (0.97 lb 2,4-D ae/A) (0.23 lb MCP-p ae/A) (0.11 lb dicamba ae/A)	2	30 Days	2 gal/A	5.82 pints/A (1.95 lb 2,4-D ae/A) (0.47 lb MCP-p ae/A) (0.21 lb dicamba ae/A)
ae = Acid Equivalent. Do not exceed the maximum seasonal rate of 5.92 pints (0.95 lb 2,4-D ae), 0.47 lb. MCP-p ae and 0.21 lb dicamba ae) per acre per season, excluding spot treatments,					

### USE PRECAUTIONS:

Do not apply this product through any type of irrigation system. Do not use this product on or near desirable plants, including within the drip line of the roots of desirable trees and shrubs, since injury may result.

Do not spray on carpetgrass, dichondra, nor on lawns or turf where desirable clovers are present. Use only lawn-type sprayers. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area. 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.

### 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, residential areas, 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 crop canopy.

TRIMEC® 848 CONTROLS:			
Bedstraw	Ground Ivy	Peppergrass	Shepherdspurse
Black Medic	Healall	Pigweed	Speedwell
Buckhorn	Henbit	Plantains	Spurge
Burdock	Knotweed	Poison Ivy	Wild Carrot
Chicory	Lambsquarters	Poison Oak	Wild Garlic
Chickweed	Lespedeza	Purslane	Wild Lettuce
Clover	Mallow	Ragweed	Wild Onion
Dandelion	Morningglory	Sheep Sorrel	Yarrow
Dock			

## 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. 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.

## LIMITED WARRANTY AND DISCLAIMER

**IMPORTANT:** Read this LIMITED WARRANTY AND DISCLAIMER before buying or using this product. By opening and using this product, buyer and all users agree to accept the terms of this LIMITED WARRANTY AND DISCLAIMER in their entirety and without exception. If the terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full.

It is impossible to eliminate all risks inherently associated with use of this product. Damage to the treated article, ineffectiveness, or other unintended consequences can result from use of the product under abnormal conditions such as weather, presence of other materials, or the manner of use or application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS.** Buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

The manufacturer warrants only that this product conforms to the chemical description given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use, subject to the inherent risks described below. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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 HEREBY EXPRESSLY DISCLAIMED.**

**THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. 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.** The Manufacturer must be promptly notified in writing of any claims, whether based in contract, tort, negligence, strict liability, or otherwise, to be eligible to receive either remedy stated above.

## **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. \_\_\_\_\_

## **DOCUMENT CONTROL INFORMATION**

**1. Unique Label Identifier:** 002217-00531.20080305.doc

**2. Previous Version:** AP091504

**3. Reason for Issue:** Various changes pertaining to re-registration. Re-format label.