

2217-532

7/30/2002

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

JUL 30 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Craig Martens
PBI Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Gordon's 13 Weed-'N-Feed
EPA Registration Number: 2217-532
Your Submission Dated April 5, 2002

The Agency is conditionally approving an amendment to the registration for 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 (CSFs) submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to product other than those specified within the body of your certification statement and cover letter dated April 17, 2002. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and bearing the previously approved labeling for 18 months from the date of this letter.
3. Update the labeling to include the following corrections:
 - a. In the Environmental Hazards Section delete "For terrestrial uses,". Refer to PR Notice 93-8.
 - b. In the labeling wherever it occurs specify "mecoprop-p".
 - c. Move "It is a violation....with its labeling" immediately below the heading Directions For Use. Under this heading delete "spray has dried or".

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A copy of the revised CSF (Basic Formation dated April 3, 2002) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,



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

Enclosure

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Official Name: **TRIMEC® 13 WEED-'N-FEED**

Brand Name: **GORDON'S TRIO**

A 20-10-5 Lawn Fertilizer Plus TRIMEC® Containing 2,4-D, MCPP-p, and Dicamba.
Controls Chickweed, Dandelion, Knotweed, Plantain, Henbit, and other broadleaf weeds.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	0.65%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.16%
Dimethylamine salt of dicamba: (3,6-dichloro-o-anisic acid)	0.07%
INERT INGREDIENTS:	99.12%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

10.8 lbs. 2, 4-dichlorophenoxyacetic acid equivalent per ton or 0.54%
2.6 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton or 0.13%
1.2 lbs. 3, 6-dichloro-o-anisic acid equivalent per ton or 0.06%

Isomer Specific by AOAC Methods.

Contains the single isomer form of Mecoprop-p.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional Precautionary Statements

NET WEIGHT (20, 22, 25, 30, 40, 44, 50, 60, 1,000, or 2,000) PO UNDS

572 APxxxxxx
EPA REG. NO. 2217-532 Amend
EPA Est. No. 2217-KS-X
MANUFACTURED BY:

G pbi/gordon
corporation
An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101
Telephone: 1-800-821-7925

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUL 30 2002

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

2217-532

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EPA Reg. No. 2217-532 Trimec® 13 Weed-'N-Feed



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid inhaling dust or contact with skin, eyes and clothing. When using this product, wear long-sleeved shirt, long pants, socks and shoes.

After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

Statement Of Practical Treatment

IF ON SKIN: ~~Promptly and thoroughly wash hands and exposed skin with soap and water.~~

FOR EYES: Flush with water for 15 minutes and get medical attention.

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. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
You may also call toll-free, 1-877-800-5556 for emergency medical treatment information.	

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 MCPP-p and 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPP-p and 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and 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.

Do not apply when weather conditions favor drift from target areas.

DIRECTIONS FOR USE

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

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.

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STORAGE & DISPOSAL

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

STORAGE: Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals.

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 Paper Bags, Plastic Bags, and Nonrefillable Bulk Bags - Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by State and local authorities by burning. If burned stay out of smoke. For Refillable Bulk Containers or Refillable Bulk Bags - Empty thoroughly and return to dealer/distributor at the specified destination for cleaning and reuse (refilling with the same pesticide).

WHERE TO USE:

Gordon's Trio is a Trimec® herbicide containing fertilizer, 2,4-D, mecoprop, and dicamba. This granular weed and feed provides plant nutrients and controls a broad spectrum of broadleaf weeds in turfgrass. Supplemental nitrogen, phosphorus, and potash should be applied according to soil tests or State Extension Service recommendations.

Gordon's Trio is intended to be applied by commercial applicators, noncommercial users, lawn care operators, and landscape personnel. Cool season and warm season grasses established in institutional, ornamental, and residential sites may be treated.

Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations; for example: hospitals, nursing homes, schools, museums, libraries, sport facilities (including golf courses), and office buildings may be treated. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, and institutional buildings. Finally, residential sites are defined as areas associated with the household or home life including, but not limited to apartment complexes, condominiums, and patient care areas of nursing homes, mental institutions, hospitals, or convalescent homes.

Gordon's Trio may be applied to newly seeded cool season turfgrass. Applications are recommended only after the third mowing or after the grass seedlings have tillered and have developed an adequate secondary root system.

Gordon's Trio may be applied to newly established warm season turfgrass. Treatments should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations, and low application rates ($\frac{1}{2}$ of the recommendation for established turfgrass) are suggested.

A uniform broadcast distribution of product on the treated area is essential. Do not exceed the specified application rate for any area and use care in the application of this product within the dripline of trees, shrubs, and other ornamentals.

Do not use this product on dichondra, carpetgrass, closely-mowed bentgrass putting greens, or turf containing desirable clovers.

WEEDS CONTROLLED:

Dandelion, chickweed, plantain, and clover are controlled effectively with Gordon's Trio. A partial list of susceptible weeds is shown below:

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- WEEDS -

Annual yellow sweetclover	Cockle	Musk thistle	Spiny amaranth
Aster	Cocklebur	Mustard	Spiny cocklebur
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spiny sowthistle
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted catsear
Beggarticks	Cudweed	Nettle	Spotted spurge
Betony, Florida	Curly dock	Orange hawkweed	Spurweed
Bindweed, field	Daisy, English	Oriental cocklebur	Stinging nettle
Bird vetch	Daisy fleabane	Oxalis	Strawberry, India mock
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall nettle
Bittercress, hairy	Dandelion	Parsnip	Tall vervain
Bitterweed	Dichondra	Pearlwort	Tansy ragwort
Black-eyed Susan	Dogbane	Pennycress	Tansy mustard
Black medic	Dogfennel	Pennywort	Tanweed
Black mustard	Dollarweed	Peppergrass	Thistle
Blackseed plantain	Elderberry	Pepperweed	Trailing crownvetch
Blessed thistle	False dandelion	Pigweed	Tumble mustard
Bloodflower milkweed	Falseflax	Pineywoods bedstraw	Tumble pigweed
Blue lettuce	False sunflower	Plains coreopsis (tickseed)	Velvetleaf
Blue vervain	Fiddleneck	Plantain	Venice mallow
Bracted plantain	Florida pusley	Poison ivy	Virginia buttonweed
Brassbuttons	Frenchweed	Poison oak	Virginia creeper
Bristly oxtongue	Galinsoga	Pokeweed	Virginia pepperweed
Broadleaf dock	Goathead	Poorjoe	Water pennywort
Broadleaf plantain	Goldenrod	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Ground ivy	Prickly lettuce	Western clematis
Buckhorn	Gumweed	Prickly sida	Western salsify
Buckhorn plantain	Hairy fleabane	Prostrate knotweed	White mustard
Bulbous buttercup	Hawkweed	Prostrate pigweed	Wild aster
Bull thistle	Healall	Prostrate spurge	Wild buckwheat
Bullnettle	Heartleaf drymary	Prostrate vervain	Wild carrot
Burclover	Heathaster	Puncturevine	Wild four-o'clock
Burdock	Hedge bindweed	Purslane, common	Wild garlic
Burning nettle	Hedge mustard	Ragweed	Wild geranium
Burweed	Hemp	Red sorrel	Wild lettuce
Buttercup	Henbit	Redroot pigweed	Wild marigold
Buttonweed	Hoary cress	Redstem filaree	Wild mustard
Canada thistle	Hoary plantain	Rough cinquefoil	Wild onion
Carolina geranium	Hoary vervain	Rough fleabane	Wild parsnip
Carpetweed	Horsenettle	Russian pigweed	Wild radish
Catchweed bedstraw	Jimsonweed	Russian thistle	Wild rape
Catnip	Knawel	Scarlet pimpernel	Wild strawberry
Catsear	Knotweed	Scotch thistle	Wild sweet potato
Chickweed, common	Kochia	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lambsquarters	Shepherdspurse	Wild sorrel
Chicory	Lespedeza	Slender plantain	Wild croton
Cinquefoil	Mallow	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Matchweed	Smooth dock	Woolly plantain
Clover, hop	Mexicanweed	Smooth pigweed	Wormseed
Clover, red	Milk vetch	Sorrel	Yarrow
Clover, strawberry	Morningglory	Sowthistle	Yellow rocket
Clover, sweet	Mouseear hawkweed	Spanishneedles	Yellowflower pepperweed
Clover, white	Mugwort	Speedwell	and other broadleaf weeds

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescue spp., perennial ryegrass, bermudagrass, and zoysiagrass: Apply 174.2 pounds of Gordon's Trio per acre of established turfgrass. Or the equivalent application rate is 4.0 pounds of product per 1,000 square feet of turfgrass.

The maximum application rate to turf is 1.0 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.

Sequential or follow-up applications may be required for dense infestations of perennial and biennial weeds. Also, adverse environmental conditions prior or after application may reduce the effectiveness. If required, the treatment interval between the first and second applications should be approximately 30 days.

Drop spreaders, rotary spreaders, and other granular equipment should be calibrated for accurate and uniform applications of this product. Calibrate the equipment by applying the product over a measured or known area and adjust the equipment according to the recommendations of the equipment manufacturer. Refer to the rate table for the appropriate bag sizes and the area to be treated.

Note to Supplemental Registrants: Select the appropriate bag size and present only the information provided for that bag size on your product labeling.

Bag Size, Pounds	Desired Rate Per Acre, Pounds	Desired Rate Per 1,000 Sq.Ft., Pounds	Treated Area For This Bag Size	
			Acres	Square Feet
20	174.2	4	----	5,000
22	174.2	4	----	5,500
25	174.2	4	----	6,250
30	174.2	4	----	7,500
40	174.2	4	0.23	10,000
44	174.2	4	0.25	11,000
50	174.2	4	0.29	12,500
60	174.2	4	0.34	15,000

Optional:

Equipment settings of drop spreaders, rotary spreaders, and other granular applicators may be presented on the container labels as requested by supplemental registrants.

APPLICATION SUGGESTIONS:

1. Spring and fall applications are recommended for the best control. However, Gordon's Trio can be applied any time broadleaf weeds are present and actively growing.
2. Mow the turfgrass 2 to 3 days before application.
3. Water the turfgrass thoroughly ($> \frac{1}{2}$ inch) at least 1 to 2 days before application.
4. Schedule applications in the morning when dew is present. Or, sprinkle or irrigate lightly ($< \frac{1}{4}$ inch) before application to provide maximum control.
5. Rainfall or irrigation within 24 hours after application may reduce the effectiveness. Do not irrigate or water the turfgrass within 24 hours after application.

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Guaranteed Analysis of Fertilizer Grade of 20-10-5	
Total Nitrogen (N).....	20%
Water Insoluble Nitrogen (N).....	5%
Available Phosphate (P ₂ O ₅).....	10%
Soluble Potash (K ₂ O).....	5%

Labeling Requirements:

- All fertilizer products distributed in Washington at a minimum, must have the following labeling statement:
"This product has been registered with the Washington State Department of Agriculture. When applied as directed, this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product."
- After July 1, 1999, the label must also state: *"Information received by the Washington State Department of Agriculture regarding the components in this product is available on the internet at <http://www.wa.gov/agr/>."*

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.

APPENDIX

I. Previously Approved Fertilizer Grades:

- ◆ Fertilizer grades with nutrient contents expressed as the percentages of N, P₂O₅, and K₂O include the following:

10-6-4	20-10-5	24-4-8
12-4-4	21-3-5	25-3-3
16-2-0	21-5-7	25-5-5
18-4-8	23-3-3	

- ◆ The fertilizer grade guaranteed analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.

II. Advertising claims presented on the container (bag) that may or may not be used by supplemental registrants:

- ◆ Fifty pounds covers up to 12,500 square feet of turf. Twenty-five pounds covers up to 6,250 square feet.
- ◆ Provides excellent response to the fertilizer plus effective broadleaf weed control.
- ◆ Combines the advantages of fertilization plus a broad range of weed control.
- ◆ Provides controlled release nitrogen feeding from Poly-S™ Technology.