



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 17, 2015

James Kunstman, PhD
VP, Regulatory Services
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101

Subject: Notification per PRN 98-10 – Addition of marketing/advertising claims and other minor changes
Product Name: Gordon's Broadleaf Weed and Brush Killer 879
EPA Registration Number: 2217-536
Application Date: May 22, 2015
Decision Number: 505764

Dear Dr. Kunstman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, you may contact Deirdre Sunderland at (703)603-0851 or via email at sunderland.deirdre@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn V. Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

GORDON'S BROADLEAF WEED & BRUSH KILLER 879

NOTIFICATION

2217-536

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

07/17/2015

EPA Reg. No. 2217-536

Alternate Brand Names: GroundWork Concentrate Poison Ivy & Brush Killer

ACTIVE INGREDIENTS:

2,4-D, dimethylamine salt (CAS 2008-39-1)	12.10%
Mecoprop-p, dimethylamine salt (CAS 66423-09-4)	2.92%
Dicamba, dimethylamine salt (CAS 2300-66-5)	1.34%
INERT OTHER INGREDIENTS	<u>83.64%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.87 lb 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 10.05%
- 0.21 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 2.42%
- 0.10 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 1.11%

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

2,4-D, dimethylamine salt (CAS 2008-39-1)

Mecoprop-p, dimethylamine salt (CAS 66423-09-4)

Dicamba, dimethylamine salt (CAS 2300-66-5)

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt, long pants, and shoes plus socks. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in eyes:

- 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 or on 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.
<p>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.</p>	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters 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.

[Environmental Hazards (alternate per PRN 2008-1)

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or runoff into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

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.

1. Precautions And Restrictions

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until sprays have dried.
- Do not exceed specified dosages for any area.
- Do not spray on carpetgrass, dichondra, nor on lawns or turf where desirable clovers are present. Clover present will be damaged if sprayed.
- Some injury can be expected to turf if used on St. Augustinegrass or centipedegrass; spot spray weeds on these grasses.
- Do not apply to newly seeded lawns until well established. New seed can be sown 3 to 4 weeks after application.
- Do not spray while grass is emerging from dormancy.
- Do not apply this product through any type of irrigation system.
- Do not apply as a fine mist because of potential for injury to desirable plants.

- 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.
- Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day. Rinse applicator over lawn area only.
- After using this product, clean sprayer with soap or detergent and water.

2. Broadleaf Weeds / Where To Use

Gordon's Broadleaf Weed & Brush Killer 879 may be used on bahiagrass, bermudagrass, bluegrass, fescue, perennial ryegrass or zoysiagrass lawns, vacant lots, playgrounds where broadleaf weeds are present. This product is especially effective on hard-to-kill weeds such as poison ivy, poison oak, sheep sorrel and spurge. In addition, it controls most other broadleaf weeds, including sensitive weeds like chickweed, clover, dandelion, knotweed, and plantain. [A partial list is given on the side panel.]

Limitations on broadcast applications to residential turfgrass:

The maximum application rate is 3.0 fl.oz. of product per 1,000 sq.ft. per application (0.88 lb 2,4-D ae, 0.21 lb MCP-p ae and 0.10 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 6.0 fl.oz. of product per 1,000 sq.ft. (1.77 lb 2,4-D ae, 0.43 lb MCP-p ae and 0.20 lb dicamba ae per acre).

WHEN TO USE:

1. Spray during the growing season when weeds are actively growing.
2. On new lawns, wait until the grass has reached a height of 2 inches before making an overall spray treatment. Wait 3 to 4 weeks before seeding or planting stolons, plugs, or sprigs.
3. Poor weed control may result if spray is applied during drought or just before rain.
4. For best results, mow before treating.
5. Do not water lawn within 24 hours after treatment.

3. How Much To Use (Entire Lawn) Hose End Sprayer

Use a hose end sprayer designed for lawns. Put specified amount of product (Column 1) in bottle and add water to indicated level (Column 2), and spray on area shown (Column 3). For example, to spray 850 square feet measure 5 tablespoons (2.5 fluid ounces) in jar, add water to the 5 gallon level, mix, and turn on hose and spray over 850 square feet

Column 1		Column 2	Column 3
Amount to Use:		Fill Bottle To: (Gallons)	Area to Treat (Square Feet)
(Tablespoons)	(Fluid Ounces)		
1	1/2	1	170
2	1	2	340
5	2.5	5	850
10	5	10	1,700
15	7.5	15	2,550
20	10	20	3,400
32	16	32	5,440

4. How Much To Use (Entire Lawn) Pressure-Sprayer

Measure indicated amount of product into tank and dilute with water according to the following chart. Use a spray pattern which gives small spray droplets without any fine mist. Cover the area indicated.

Amount of Product to Use		Amount of Water in Sprayer (Gallons)	Area to be Sprayed (Square Feet)
(Tablespoons)	(Fluid Ounces)		
2	1	1/2	335
4	2	1	670
8	4	2	1,300
12	6	3	2,000

5. How Much To Use (Spot Treatment)

[To spray small areas or individual weeds, do not use a hose end sprayer. Mix 1 fluid ounce (2 tablespoons) with a half-gallon of water in pressure sprayer and spray as required being certain to wet each weed.]

[OR]

[Apply 1.5 to 2.2 gallons of product per acre with adequate water or apply a 1.2 to 4.6% %vol/vol spray solution as a full cover spray. Use the lower spray concentrations in the range for susceptible species and use the higher spray concentrations within the range for hard-to-control species, for mature plants during the late summer or under adverse environmental conditions (e.g. drought). Spray broadleaf weeds, woody plants or mixed brush uniformly and thoroughly by wetting all leaves, stems, bark and root collars.

For Backpack sprayers, knapsack sprayers, and hand-pressurized pump sprayers.

Instructions for preparing 1 to 3 gallons of spray solution at 1.2 to 4.6% spray concentration with water for high volume foliar applications.

Gallons of Water	Amount Of Product Needed for Spray Concentration of :			
	1.2%	1.5%	2.3%	4.6%
1	3 tablespoons	4 tablespoons	6 tablespoons	12 tablespoons
2	3 fl.oz.	4 fl.oz.	6 fl.oz.	12 fl.oz.
3	4.5 fl.oz.	6 fl.oz.	9 fl.oz.	18 fl.oz.

Equal measures: 1 fl.oz. = 2 Tablespoons (Tbs.) = 6 Teaspoons (tsp.)

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Limitations on spot treatments to woody plants:

The maximum noncropland application rate for tree, brush and woody plant control is 2.2 gallons of product per acre per application per site. The maximum seasonal application rate for trees, brush and woody plant control is 2.2 gallons of product per acre per application per site. Limited to 1 application per year

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 3.0 fl.oz. per 1,000 sq.ft. per application (0.21 lb MCPP-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.

6. Brush & Weeds Controlled

Sensitive Weeds:			
Bedstraw Black Medic Buckhorn Chickweed	Clover Dandelion Knotweed Lambsquarters	Peppergrass Plantain Purslane	Ragweed Shepherd's purse Wild Lettuce
Hard-To-Kill Weeds:			
Chicory Dock Ground Ivy Healall Lespedeza	Mallow Morningglory Oxalis Pigweed	Poison Ivy Poison Oak Sheep Sorrel Speedwell	Spurge Wild Carrot Wild Onion Yarrow
Brush:			
Ash Aspen Birches Black Cherry	Brambles Elms Gooseberry Honeylocust	Kudzu Multiflora Rose Oak Poison Ivy	Poison Oak Shortleaf Pine Thistle Willows

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for www.website.com for disposal instructions. Never place unused product down any indoor or outdoor drain.

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:

Herbicide Benefit Claims:

- Kills to the root
- Kills the root
- Kills weeds – Not Lawns* *when used as directed
- Starts working within [in] hours
- Kills poison ivy, poison oak, kudzu & woody weeds
- To control broadleaf weeds in lawns
- Control Weeds* *See inside booklet for complete list of weeds controlled
- Controls Ash, Aspen, Brambles, Clover, Dandelion, Henbit, Knotweed, Kudzu, Plantain, Poison Ivy, Poison Oak, Spurge and other broadleaf weeds and brush.
- Controls many lawn weeds [as listed]
- Effectively controls dandelion chickweed and spurge as listed
- Effectively controls many lawn weeds as listed

General Marketing Claims:

- Use along fences, driveways, patios & homes
- The Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, expressed or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Manufacturer, and Buyer assumes the risk of any such use.
- [XXX] covers up to [XXX] square feet[*]
- [This container] makes up to XXX[*]
- * When mixed XXX of product with YYY of water.
- Keep From Freezing

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00536.20150710.notif-proposed-highlighted-revised

2. **Reason for Issue:** ad claims, reformat ingredient statement (move CAS numbers), bracket optional information, EPA Comments #1