

2217-537

C. 02110/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

10 FEB 2009

PBI/Gordon Corp.  
1217 West 12<sup>th</sup> Street  
Kansas City, MO 64101

Subject: 2,4-D RED Label Amendment  
Gordon's Trimec Spot Weeder  
EPA Reg. No. 2217-537

The labeling referred to above is in compliance with the 2,4-D RED and are amended under the RED provided that you:

1. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
2. Make the following changes to the product labeling:
  - a. Per the acute toxicity review, the signal word currently on the label "CAUTION" must be revised to read "DANGER."
  - b. Per the acute toxicity review, the Hazard to Humans and Domestic Animals should read:  
"DANGER  
Corrosive. Causes irreversible eye damage. Harmful if swallowed. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear (goggles, safety glasses, face shield), long sleeved shirt, long pants, shoes, socks and chemical resistant gloves made of any waterproof material."
  - c. Per the acute toxicity review, the order of the First Aid headings should be:  
"IF IN EYES:.....  
IF SWALLOWED:....  
IF ON SKIN OR CLOTHING:..."

Continued on Page 2

- d. A Note to Physician should immediately follow the First Aid section that reads:  
**“Probable mucosal damage may contraindicate the use of gastric lavage.”**

The proposed label should also contain information that addresses the primary eye irritation Toxicity Category I. The following statements are some suggested types of information that could be included, if applicable, in the Note to Physicians:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

- e. A USER SAFETY RECOMMENDATIONS text box should be added to the label with the following statements:  
“User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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.”

- f. Per the 2,4-D RED, the Environmental Hazards should read as follows:

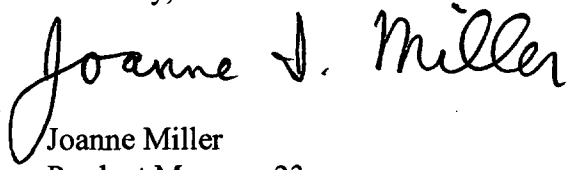
“This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters.

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.”

- g. Remove, modify, or submit efficacy studies to support the advertisement claims that include the following **text in bold**, as they are overly broad:  
“Kills....roots **and all**”

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

A stamped copy of your labeling is enclosed for your records. Submit one (1) copy of the revised final printed label for the record before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions

Sincerely,  
  
Joanne Miller  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

Stamped 11/1/08

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# GORDON'S TRIMEC® SPOT WEEDER

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

10 FEB 2009

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

## EPA Reg. No. 2217-537

2217-537

### ACTIVE INGREDIENT:

2,4-D, dimethylamine salt .....	0.60%
Mecoprop-p, dimethylamine salt .....	0.14%
Dicamba, dimethylamine salt .....	0.07%
INERT INGREDIENTS: .....	<u>99.19%</u>
TOTAL .....	100.00%

### THIS PRODUCT CONTAINS:

- 0.50% 2,4-dichlorophenoxyacetic acid equivalent.
- 0.12% (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent.
- 0.05% 3,6-dichloro-o-anisic acid equivalent.

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)

Note: If the design, format, or small size of the container labels makes it impractical to present the entire ingredient statement on the front panel, then add a referral statement and present this substatement on the back panel: "See back panel for substatement of ingredient statement".

## 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. Avoid contact with eyes, skin or clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

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 or on clothing:</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 a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</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 call toll-free, 1-877-800-5556 for emergency medical treatment information. [OPTIONAL CONSUMER ACCESS TELEPHONE NUMBERS:] For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Telecommunications Network at 1-800-858-7378.</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 run off 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.]

**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 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 dosage. This product is intended for spot spraying individual weeds only.
- 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.

**WHAT IT IS & HOW TO USE IT:**

Gordon's Trimec® Spot Weeder contains Trimec® turf herbicide, a combination of three proven weed killers 2,4-D, mecoprop-p and dicamba. Together they control a wide range of broadleaf lawn weeds; some of which are listed on this label.

Use to "spot-treat" weeds in the lawn. For best results, apply when weeds are actively growing. Do not water within 24 hours after spraying. Use as is. Do not mix. Do not dilute. Aim at weed and spray. Only a short burst is needed. Overspraying only wastes the product and may cause damage to grasses such as centipedegrass, St. Augustinegrass, and Floratam. Effects begin to show after a few days and

weeds gradually die. Up to 4 weeks may be required for complete kill. Repeat in 30 days if necessary. The number of spot treatments is limited to 2 per year.

**CONTROLS:**

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

## **STORAGE AND DISPOSAL**

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

**CONTAINER DISPOSAL: If Empty** - Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled** - Call your local solid waste agency 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:**

- Kills [Controls] (Number) weed types, roots and all
- Water-based or Water-based formulation
- Kills the weeds, not the lawn
- Kills the root.
- Kills the entire weed or plant roots and all.
- Kills (Controls) a wide range of broadleaf weeds roots and all.
- Controls [Kills] (desired weed species from attached listing may be inserted here,) and many other broadleaf lawn weeds.
- Kills [Controls] (desired weed species from attached listing may be inserted here,) and over (Number) broadleaf weeds
- Kills (Number) weeds
- Kills weed roots
- Starts working overnight
- Rainfast in 6 hours
- Rainproof in 6 hours
- Effective for the control of clover, dandelions, and many other broadleaf weeds.
- Kills [Controls] (Number) types of weeds.
- Controls (Number) of weed species that infest turfgrass.
- Controls (Number) of major pests in many types of lawns (turfgrass).
- Controls dandelion, chickweed, and many other weeds as listed.

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- Kills [Controls] Poison Ivy, Poison Oak.
- Kills dandelion, chickweed, clover, oxalis, plantain and others.
- Use as is.
- Do not mix.
- Aim at weed and spray.
- Product Usage [chart]
- Kills: Dandelions, Chickweed, Clover, Spurge, Plantain, Oxalis, Dollarweed, Wild Onion
- Use on: all types of lawns - Use to spot treat weeds
- Amount to use: No mixing - Use as is
- Controls - Thistle, Poison Ivy, Poison Oak, and many other weeds as listed.
- Kills the entire plant, roots and all.
- Controls Poison Oak & Ivy.
- Won't harm lawn grasses\* \*when used as directed.
- A TRIMEC® Turf Herbicide Formulation
- Ready-to-Use, No Mixing, No Pouring. Aim at Weed & Spray
- KEEP FROM FREEZING

3. The following instructions would appear on the bag, or be enclosed with the bag containing the trigger sprayer, or would appear on the container label.

**A. SUPPLEMENTAL LABELING FOR USE WITH ATTACHED TRIGGER SPRAYER.**

**DIRECTIONS FOR USE OF TRIGGER SPRAYER**

1. Remove sprayer from bag.
2. Unscrew cap from bottle and remove the foil seal.
3. Making sure that tube is properly inserted through hole in cap, insert tube into bottle and screw on cap.
4. Open spray nozzle approximately one full turn.
5. TO PRIME - With sprayer directed at the target area, operate trigger until spray begins (approximately 10 to 15 times).
6. Adjust the sprayer nozzle for desired spray pattern.

**STORAGE OF TRIGGER SPRAYER**

1. Close spray nozzle.
2. Hook the trigger on or under the bottle handle so that trigger is above the level of contents.
3. To prevent clogging of trigger, remove sprayer from bottle and pump clean water through the hose and trigger.

**B. SUPPLEMENTAL LABELING FOR USE WITH ATTACHED TRIGGER SPRAYER.**

**SPRAYER INSTRUCTIONS**

**How to prime and care for your sprayer.**

1. After shaking product well, remove cap from container and replace with sprayer hose and cap assembly. Tighten securely.
2. Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10 to 15 times until product is dispensed. Adjust nozzle to coarse stream.
3. To store, turn nozzle to "OFF" position and store with sprayer above level of liquid in container to prevent leakage.



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## **DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-00537.20081105.proposed.doc

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