



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 27, 2016

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

Subject: Notification per PRN 98-10 – Updated Weeds List, Format, Clarify Label Language, and Additional Ad Claims  
Product Name: Gordon's Trimec Spot Weeder  
EPA Registration Number: 2217-537  
Application Date: 03/07/2016  
Decision Number: 515634

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.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, please contact Terri Stowe by phone at (703) 305-6117, or via email at [stowe.terri@epa.gov](mailto:stowe.terri@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

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:

06/27/2016

# GORDON'S TRIMEC® SPOT WEEDER

## EPA Reg. No. 2217-537

### ACTIVE INGREDIENTS:

2,4-D, dimethylamine salt .....	0.60%
Mecoprop-p, dimethylamine salt .....	0.14%
Dicamba, dimethylamine salt .....	0.07%
OTHER INGREDIENTS: .....	99.19%
TOTAL .....	100.00%

### THIS PRODUCT CONTAINS:

- 0.50% 2,4-dichlorophenoxyacetic acid equivalent. (CAS 2008-39-1)
- 0.12% (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent. (CAS 66423-09-4)
- 0.05% 3,6-dichloro-o-anisic acid equivalent. (CAS 2300-66-5)

Isomer Specific by AOAC Methods.

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

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.**

[Note to reviewer: This language has been moved from the Appendix]

<b>Mandatory Labeling Statements which will appear on different label components depending on packaging configuration.</b>	
<b>Referral Statement:</b> See attached booklet [back panel] [side panel] for complete Precautionary Statements and Directions for Use (including First Aid and Storage and Disposal). [for similar language dependent on configuration of container label]	
<b>Net Contents:</b> _____	
<b>EPA Est. No.</b> _____	
<b>Company Name and Address:</b>	
PBI/Gordon Corporation	
1217 West 12 <sup>th</sup> Street	
Kansas City, Missouri 64101	



## **PRECAUTIONARY STATEMENTS**

### **Hazards to Humans and Domestic Animals**

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

<b>First Aid</b>	
<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 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>
<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>
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.	

### **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.

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.

### **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. Over spraying 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 fieldcross	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 wintercross	Daisy fleabane	Parsnip	Tall vervain
Bittercross, 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

**WEEDS**

Burning nettle	Henbit	Redroot pigweed	Wild lettuce
Burweed	Hoary cross	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	Shepherd's purse	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	Spanish needles	Yellow rocket
Clover, strawberry	Mugwort	Speedwell	Yellowflower pepperweed
Clover, sweet	Musk thistle	Spiny amaranth	and other broadleaf weeds

**WEEDS [253]**

Amaranth, purple	Cupid shaving Brush	Mugwort	Speedwell, common
Amaranth, slender	Cudweed	Mustard, ball	Speedwell, corn
Aster, heath	Daisy, English	Mustard, black	Speedwell, ivyleaf
Aster, white heath	Daisy, oxeye	Mustard, blue	Speedwell, Persian
Aster, purple	Dandelion, common	Mustard, hedge	Speedwell, purslane
Aster, white prairie	Dandelion, false	Mustard, Indian,	Speedwell, slender
Artichoke	Day flower	Mustard, tansy	Speedwell, snow
Austrian fieldcress	Deadnettle	Mustard, tumble	Speedwell, thymeleaf
Bedstraw, Catchweed	Dichondra	Mustard, white	Spiny amaranth
Bedstraw, smooth	Dock, broadleaf	Mustard, wormseed	Spurge, spotted
Bedstraw, Northern	Dock, curly	Nettle, stinging (burning)	Spurge, prostrate
Bedstraw, pineywoods	Dogbane	Nettle, tall	Spurweed
Beggarticks, hairy	Dogfennel	Nettle, wood	Star of Bethlehem
Betony, Florida	Dollarweed	Parsley-piert	Strawberry, India mock
Bindweed, Field	(Pennywort)	Parsnip	Tansy ragwort
Bindweed, Hedge	Dove weed	Pearlwort	Tanweed
Bitter Wintercress	Elderberry	Pennycress (frenchweed)	Thistle, blessed
Bittercress, hairy	Falseflax	Pepperweed, perennial	Thistle, bull
Bitterweed	False sunflower	Pepperweed, Virginia	Thistle, Canada
Black-eyed Susan	Fiddleneck	(Peppergrass)	Thistle, flodman (prairie)
Black Medic	Filaree, redstem	Pigweed, prostrate	Thistle, musk
Blood flower milkweed	Filaree, whitestem	Pigweed, redroot	Thistle, platte
Blue lettuce	Fleabane, daisy	Pigweed, russian	Thistle, plumeless
Brassbuttons	(annual)	Pigweed, smooth	Thistle, Russian
Bristly oxtongue	Fleabane, rough	Pigweed, tumble	Thistle, scotch
Broomweed	Galinsoga, hairy	Pineapple weed	Thistle, wavyleaf
Buckhorn	Galinsoga, smallflower	Plains coreopsis (tickseed)	Thistle, yellow (horrible)
Bullnettle	Goldenrod	Plantain, blackseed	Trailing crownvetch
Burclover	Ground ivy	Plantain, bracted	Velvetleaf
Burdock	Groundsel	Plantain, broadleaf	Vervain, blue
Burweed, lawn (spurweed)	Gumweed	Plantain, buckhorn	Vervain, hoary
Buttercup, bulbous	Hairy fleabane	Plantain, hoary	Vervain, prostrate
Buttercup, creeping	Hawkweed, meadow	Plantain, narrowleaf	Vervain, tall
Buttonweed, common	Hawkweed, mouseear	Plantain, slender	Vetch, bird
(poorjoe)	Hawkweed, orange	Plantain, woolly	Vetch, hairy
Buttonweed, Virginia	Hawkweed, yellow	Poison ivy	Vetch, milk
Carolina geranium (wild)	Healall	Poison oak	Vetch, narrowleaf
Carpetweed	Heartleaf drymary	Pokeweed	Vetch, wild

Catnip	Hemp	Prairie Sunflower	Virginia creeper
Catsear, spotted (false dandelion)	Henbit	Prickly lettuce (compass plant)	Western clematis
Chamber bitter	Hoary cress	Prickly sida	Western salsify
Chickweed, common	Horsenettle	Prostrate knotweed	Wild aster
Chickweed, mouseear	Horseweed	Puncturevine	Wild buckweed
Chickweed, sticky	Jimsonweed	Purslane, common	Wild carrot
Chicory	Johnny-Jumpup violet	Pusley, brazil	Wild four-o'clock
Cinquefoil	Knawel	Pusley, Florida	Wild garlic
Clover, crimson	Knotweed, prostrate	Pusley, large flower	Wild lettuce
Clover, alyce	Kochia	Ragweed, bur	Wild marigold
Clover, hop	Lambsquarters	Ragweed, common	Wild mustard (yellow rocket)
Clover, rabbit foot	Lespedeza	Ragweed, lanceleaf	Wild onion
Clover, red	Mallow, alkali	Ragweed, western	Wild parsnip
Clover, strawberry	Mallow, bristly	Redstem filaree	Wild radish
Clover, yellow sweet	Mallow, common	Rough cinquefoil	Wild rape
Clover, white sweet	Mallow, dwarf	Scarlet pimpernel	Wild strawberry
Clover, white	Mallow, venice	Shepard's purse	Wild sweet potato
Cockle	Marcela	Smartweed, ladythumb	Wild violet
Cocklebur	Matchweed	Smartweed, pale	Woodsorrel, creeping
Cocklebur, oriental	Mexicanweed	Smartweed, Pennsylvania	Woodsorrel, violet
Cocklebur, spiny	Moneywort	Smooth chaff-flower	Woodsorrel, yellow (Oxalis)
Common mullein	Morningglory, bigroot	Smoothdock	Woolly croton
Corn Spurry	Morningglory, ivyleaf	Sorrel, red (sheep)	Wormseed
Creeping Beggarweed	Morningglory, Mexican	Sowthistle, annual	Yarrow, common
Creeping Jenny (creeping Charlie)	Morningglory, red	Sowthistle, spiny	Yarrow, western
	Morningglory, tall	Spanish needles	Yarrow, yellow
	Morningglory, wolly	Speedwell, bi-lobed	

## STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** 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** - Do not reuse this container. Place in trash or offer for recycling if available.

**If Partly Filled** - Call your local solid waste agency for [www.website.com](http://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 the weeds, not the lawn
- Kills the root.
- 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
- 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.
- Effectively controls [desired weeds species] and more as listed
- Kills [Controls] Poison Ivy, Poison Oak.
- Kills dandelion, chickweed, clover, oxalis, plantain and others.
- Kills: Dandelions, Chickweed, Clover, Spurge, Plantain, Oxalis, Dollarweed, Wild Onion
- Controls - Thistle, Poison Ivy, Poison Oak, and many other weeds as listed.
- Controls Poison Oak & Ivy.
- A TRIMEC® Turf Herbicide Formulation

### General Marketing Claims:

- Water-based or Water-based formulation
- Rainfast in 6 hours
- Rainproof in 6 hours
- Use as is.
- Do not mix.
- Aim at weed and spray.
- Product Usage [chart]
- Use on: all types of lawns - Use to spot treat weeds
- Amount to use: No mixing - Use as is
- Won't harm lawn grasses\* \*when used as directed.
- Ready-to-Use, No Mixing, No Pouring. Aim at Weed & Spray
- KEEP FROM FREEZING
- Store and transport in an upright position.
- Manufactured in the U.S.A
- **Product Facts [Usage]: Kills:** Kills dandelion, chickweed, clover, oxalis, plantain, and other listed weeds. **Use on:** Use to spot treat weeds in all types of lawns. **Questions or Comments:** Call 1-XXX-XXX-XXXX.

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.

**DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-00537.20160607.notif-proposed-highlighted

2. **Reason for Issue:** EPA Comments #2 = add updated weeds list; formatting; clarify label language; ad claims + EPA Comments #1

**Internal Usage Notes**

Associated Container Label: Supplemental Distributors