

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Doug Soper PBI/Gordon Corporation P.O. Box 014090 Kansas City, MO 64101

JUN 1 2 2014

Subject:

Label Amendment - Multiple Label Revisions

Gordon's BL 8000 Lawn Weed Killer

EPA Reg. No. 2217-539

Application dated – June 4, 2014

Dear Mr. Soper:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Should you wish to retain a reference to a website on your label, please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and is therefore 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). 40CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. Additionally, 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 for your product through the registration process. Therefore, should the Agency find 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.

A stamped copy of the label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products released for shipping after eighteen (18) months must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions regarding this letter, please contact Maggie Rudick at (703) 347-0257 or <a href="mailto:rudick.maggie@epa.gov">rudick.maggie@epa.gov</a>.

Sincerely,

Kathryn V. Montague

Product Manager 23

Herbicide Branch

Registration Division (7505P)

# **GORDON'S BL 8000 LAWN WEED KILLER**

# EPA Reg. No. 2217-539

Two sublabels represent the entire or master label of GORDON'S BL 8000 LAWN WEED KILLER. Please refer to the appropriate section of the labeling as shown as follows:

#### Section

Label language common to all sublabels

Sublabel 1. Draft labeling previously approved on November 13, 2012

Sublabel 2. Proposed instructions for small trailer sprayers

**Appendix** 

**Document Control Information** 

## ACCEPTED

06/12/2014

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2007, 500

2217-539

# **Label Language Common To All Sublabels**

# **GORDON'S BL 8000 LAWN WEED KILLER**

# EPA Reg. No. 2217-539

Alternate Brand Names: GroundWork Concentrate Weed Killer, Gordon's Trimec Lawn Weed Killer, Trimec Lawn Weed Killer

#### **ACTIVE INGREDIENT:**

2,4-D, dimethylamine salt	7.59%
Mecoprop-p, dimethylamine salt	
Dicamba, dimethylamine salt	0.84%
OTHER INGREDIENTS:	89.74%
TOTAL	
TO I / L	100.0070

#### THIS PRODUCT CONTAINS:

0.54 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 6.30%

0.13 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.51%

0.06-lb-3,6-dichloro-o-anisic acid equivalent per gallon or 0.70%

Isomer Specific by AOAC Method.

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

2,4-D,dimethylamine salt (CAS Registry No. 2008-39-1) Mecoprop-p, dimethylamine salt (CAS Registry No. 66423-09-4) Dicamba, dimethylamine salt (CAS Registry No. 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. OBSERVÉ ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

# 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.

<ul> <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>
<ul> <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>
<ul> <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>
<ul> <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>

#### 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.

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**

#### 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 [or <a href="www.website.com">www.website.com</a>] 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 INCIDENTIAL, 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.

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## **SUBLABEL 1**

## Draft labeling previously approved on November 13, 2012

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### 1. Use 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.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.
- Use only lawn-type sprayers. Do not spray on carpetgrass, dichondra, nor on lawns or turf where desirable clovers are present. Do not exceed specified dosages for any area.
- The turf tolerance of centipedegrass and St. Augustinegrass can range from sensitive to tolerant. Do not apply this product to 'Floratam' St. Augustinegrass in Florida.
- 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 sprayer over lawn area only.

#### 2. Where To Use

Gordon's BL 8000 Lawn Weed Killer may be used on bahiagrass, bermudagrass, Kentucky bluegrass, fescue, perennial ryegrass, zoysiagrass, centipedegrass, and St. Augustinegrass lawns, vacant lots, playgrounds and other similar areas where broadleaf weeds are present. This product is especially effective on all hard-to-kill weeds such as poison ivy, poison oak, sheep sorrel and spurge. In addition, BL 8000 Lawn Weed Killer controls most other broadleaf weeds, including sensitive weeds such as chickweed, clover, dandelion, knotweed and plantain. A partial list is given on the side panel.

#### 3. 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. However, a spot treatment may be made at any time with a small pressure sprayer. Wait 3 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.

#### 4. How Much To Use (Entire Lawn)

#### 4.1 Hose End Sprayers

Use a hose end sprayer designed for lawns. Pour specified amount of product (Column 1) in bottle and add water to indicated level (Column 2), and spray on area shown in Column 3. For example, to spray

2,500 square feet measure 10 fluid ounces (20 tablespoons) in jar, add water to the 10 gallon level, and mix. Turn on hose and spray as evenly as possible over 2,500 square feet.

**Chart 1:** Amounts of Gordon's BL 8000 Lawn Weed Killer for bahiagrass, bermudagrass, Kentucky bluegrass, fescues perennial ryegrass, and zovsiagrass lawns applied with hose end sprayers.

	mn 1 Weed Killer to Use	Column 2 Fill Bottle to	Column 3 Area to Treat
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Feet)
10	5	5	1,250
20	10	10	2,500
30	15	15	3,750
40	20	20	5,000

Note: For the grasses in Chart 1, apply the entire contents of this container (32 fluid ounces) on 8,000 square feet of turf.

Chart 2: Amounts of Gordon's BL 8000 Lawn Weed Killer for centipedegrass and St. Augustinegrass lawns applied with hose end sprayers.

	mn 1 Weed Killer to Use	Column 2 Fill Bottle to	Column 3 Area to Treat
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Feet)
10	5	5	2,500
20	10	10	5,000
30	15	15	7,500
40	20	20	10,000

Note: For St. Augustinegrass and centipedegrass apply the entire contents of this container (32 fluid ounces) on 16,000 square feet of turf.

#### 4. 2 Pressure Sprayers

Measure indicated amount of Gordon's BL 8000 Lawn Weed Killer, pour into tank, and dilute with water according to the following chart. Use a spray pattern that gives small [coarse] spray droplets without any fine mist, and cover the area indicated.

Chart 3. For bahiagrass, bermudagrass, Kentucky bluegrass, fescues, perennial ryegrass, and zoysiagrass lawns with pressure or tank type sprayers.

Amount of Lawn Weed Killer to Use		Amount of Water in Sprayer	Area To Treat
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Feet)
2	1	[0.25 to 1]	250
4	2	[0.5 to 2]	500
6	3	[0.75 to 3]	750
8	4	[1 to 4]	1000
12	6	[1.5 to 6]	1500

Chart 4: For centipedegrass and St. Augustinegrass lawns with pressure or tank type sprayers.

Amount of Lawn Weed Killer to Use		Amount of Water in Sprayer	Area To Treat
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Feet)
2	1	[0.25 to 1]	500
4	2	[0.5 to 2]	1,000
6	3	[0.75 to 3]	1,500
8	4	· [1 to 4]	2000
12	6	[1.5 to 6]	3000

[Alternate Chart 4 (for GW product)]

Amount of Lawn Weed Killer to Use		Amount of Water in Sprayer	Area To Treat
(Tablespoons)	(Fluid Ounces)	(Gallons)	(Square Feet)
1	0.5	[0.25 to 1]	250
2	1	[0.5 to 2]	500
3	1.5	[0.75 to 3]	750
4	2	[1 to 4]	1000
6	3	[1.5 to 6]	1500

[End Alternate Chart 4]

#### **Spot Spraying [Treatment]**

To spray small areas or individual weeds, do not use a hose end sprayer. Refer to Chart 3 or Chart 4 for mixing instructions. Spray as needed and be certain to wet the weeds.

#### 4.3 [Spray Delivery System Name]

[When Packaged Accordingly:]
Battery Operated [Powered] Sprayer

#### SPRAYER: USE DIRECTIONS

The [Spray Delivery System Name] is a patented innovative home lawn, landscape, and perimeter tank spray system. Spot treat [[bugs] [and] [or] [weeds]] with this easy to use system.

- Unscrew the tank cap and fill the tank with water up to the one gallon indicator. [The tank holds one gallon of water.]
- 2.—Remove the [sprayer]-[wand]-[applicator]-from the tank-holster and unfold the [sprayer] [wand] [applicator].
- 3. Select the [cartridge] [bottle] [insecticide] [herbicide] labeled for intended use. READ THE ENTIRE PRODUCT LABEL PRIOR TO USE.
- 4. Remove the cap from the [cartridge] [bottle] [insecticide] [herbicide]. [Each [cartridge] [bottle] contains 4 oz. of [product] [liquid]. Each 4 oz. [cartridge] [bottle] of concentrate makes one gallon of [liquid] [ready to use]spray.]
- 5. Insert the [cartridge] [bottle] [insecticide] [herbicide] into the top of the sprayer and twist until tight.
- 6. Press the trigger to spot spray [bugs] [weeds] as listed on the product label.
- 7. When finished spot treating remove the [cartridge] [bottle] [insecticide] [herbicide]. Replace the cap on the [cartridge] [bottle] [insecticide] [herbicide]. Follow label Storage and Disposal instructions for product [insecticide] [herbicide] [bottle].
- After spot spraying rinse the [sprayer] [wand] [applicator] according to the RINSE: USE DIRECTIONS.

#### **RINSE: USE DIRECTIONS**

- 1. Remove the [cartridge] [bottle] [insecticide] [herbicide]. Ensure that there is water in the one gallon tank.
- 2. Press and hold the [trigger] [sprayer] for 10 seconds to flush the [sprayer] [wand] [applicator] with clean water from the tank.

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#### CHANGE [CARTRIDGE] [BOTTLE]: USE DIRECTIONS

- 1. Remove the [cartridge] [bottle] [insecticide] [herbicide] currently loaded in the [Spray Delivery System Name] .
- 2. Follow label Storage and Disposal instructions for product [insecticide] [herbicide] [cartridge] [bottle].
- 3. Press and hold the [trigger] [sprayer] for 10 seconds to flush the [sprayer] [wand] [applicator] with clean water from the tank.
- 3. Select a new [cartridge] [bottle] [insecticide] [herbicide] labeled for intended use. READ THE ENTIRE PRODUCT LABEL PRIOR TO USE.
- 4. Insert the [cartridge] [bottle] [insecticide] [herbicide] into the top of the sprayer and twist until tight.

5. Press the trigger to spot spray [bugs] [weeds] as listed on the product label.

- 6. When finished spot treating remove the [cartridge] [bottle] [insecticide] [herbicide]. Replace the cap on the [cartridge] [bottle] [insecticide] [herbicide]. Follow label Storage and Disposal instructions for product [insecticide] [herbicide] [cartridge] [bottle].
- 7. After spot spraying, rinse the [sprayer] [wand] [applicator] according to the RINSE: USE DIRECTIONS. Store the [Spray Delivery System Name] OR RINSE and change [cartridge] [bottle].

#### NOTE: IF OUTPUT SPRAY IS DIMINISHED OR SPUTTERING, DO THE FOLLOWING:

- 1. Check that there is water remaining in the one gallon tank. If not, refill the tank with water.
- 2. Check that there is liquid remaining in the [cartridge] [bottle]. If not, change to a new [cartridge] [bottle].

[Two [cartridges] [bottles] can be stored on the back of the [Spray Delivery System Name]] .

#### [{Optional:}CHANGING BATTERIES:]

If sprayer does not operate or spray performance declines significantly, change the four AA alkaline batteries in the sprayer handle as follows:

- Remove the [cartridge] [bottle].
- 2. Slide the battery cover open in the underside of sprayer handle.
- 3. Allow battery cover to swing open.
- 4. Remove old batteries.
- 5. Replace with four AA alkaline batteries. Make sure the positive and negative ends match the direction indicated on the inside of the battery door.
- 6. Close battery door and slide the door until latch is closed.

#### 4.4 Limitations on broadcast applications to residential turfgrass

The maximum application rate is 4.0 fl.oz. of product per 1,000 sq.ft. per application [0.74 lb 2,4-D ae, 0.18 lb MCPP-p ae and 0.08 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 8.0 fl.oz. of product per 1,000 sq.ft. [1.47 lb 2,4-D ae, 0.35 lb MCPP-p ae and 0.16 lb dicamba ae per acre].

#### 4.5 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 4.0 fl.oz. per 1,000 sq.ft. per application [0.18 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.

#### 5. Use Precautions

Schedule the herbicide applications when air temperatures are 60° to 90°F with good soil moisture.
 Avoid applications during the spring transition of the warm season grasses and during periods of extremely high temperatures. The tolerance of warm season grasses decreases at air temperatures greater than 90°F and when turfgrass is drought stressed.

BROADLEAF WEEDS			
	Cupid shaving Brush	Mustard, ball	Speedwell common
Amaranth, purple		1	Speedwell, common
Amaranth, slender	Cudweed	Mustard, blue	Speedwell, corn
Aster, heath	Daisy, English	Mustard, blue	Speedwell, ivyleaf
Aster, white heath	Daisy, oxeye	Mustard, hedge	Speedwell, persian
Aster, purple	Dandelion, common	Mustard, Indian,	Speedwell, purslane Speedwell, slender
Aster, white prairie Artichoke	Dandelion, false	Mustard, tansy	
<b>1</b>	Day flower Deadnettle	Mustard, tumble Mustard, white	Speedwell, snow
Austrian fieldcress	Dichondra	1	Speedwell, thymeleaf Spiny amaranth
Bedstraw, Catchweed	Dock, broadleaf	Mustard, wormseed	1
Bedstraw, smooth Bedstraw, Northern	Dock, curly	Nettle, stinging (burning) Nettle, tall	Spurge, spotted Spurge, prostrate
Bedstraw, pineywoods	Dogbane	Nettle, wood	Spurweed
Beggarticks, hairy	Dogfennel	Parsley-piert	Star of Bethlehem
Betony, Florida	Dollarweed (Pennywort)	Parsnip	Strawberry, India mock
Bindweed, Field	Dove weed	Pearlwort	Tansy ragwort
Bindweed, Hedge	Elderberry	Pennycress (frenchweed)	Tanweed
Bitter Wintercress	Falseflax	Pepperweed, perennial	Thistle, blessed
Bittercress, hairy	False sunflower	Pepperweed, virginia	Thistle, bull
Bitterweed	Fiddleneck	(Peppergrass)	Thistle, canada
Black-eyed Susan	Filaree, redstem	Pigweed, prostrate	Thistle, flodman (prairie)
Black Medic	Filaree, whitestem	Pigweed, redroot	Thistle, musk
Blood flower milkweed	Fleabane, daisy (annual)	Pigweed, russian	Thistle, platte
Blue lettuce	Fleabane, rough	Pigweed, smooth	Thistle, plumeless
Brassbuttons	Galinsoga, hairy	Pigweed, tumble	Thistle, russian
Bristly oxtongue	Galinsoga, smallflower	Pineapple weed	Thistle, scotch
Broomweed	Goldenrod	Plains coreopsis (tickseed)	Thistle, wavyleaf
Buckhorn	Ground ivy	Plantain, blackseed	Thistle, yellow (horrible)
Bullnettle	Groundsel	Plantain, bracted	Trailing crownvetch
Burclover	Gumweed	Plantain, broadleaf	Velvetleaf
Burdock	Hairy fleabane	Plantain, buckhorn	Vervain, blue
Burweed, lawn (spurweed)	Hawkweed, meadow	Plantain, hoary	Vervain, hoary
Buttercup, bulbous	Hawkweed, mouseear	Plantain, narrowleaf	Vervain, prostrate
Buttercup, creeping	Hawkweed, orange	Plantain, slender	Vervain, tall
Buttonweed, common	Hawkweed, yellow	Plantain, woolly	Vetch, bird
(poorjoe)	Healall	Poison ivy	Vetch, hairy
Buttonweed, virginia	Heartleaf drymary	Poison oak	Vetch, milk
Carolina geranium (wild)	Hemp	Pokeweed	Vetch, narrowleaf
Carpetweed	Henbit	Prairie Sunflower	Vetch, wild
Catnip	Hoary cress	Prickly lettuce (compass	Virginia creeper
Catsear, spotted (false	Horsenettle	plant)	Western clematis
dandelion)	Horseweed	Prickly sida	Western salsify
Chamber bitter	Jimsonweed	Prostrate knotweed	Wild aster
Chickweed, common Chickweed, mouseear	Johnny-Jumpup violet Knawel	Purcturevine	Wild buckweat  Wild carrot
		Purslane, common Pusley, brazil	Wild four-o-clock
Chickweed, sticky	Knotweed, prostrate	Pusley, florida	Wild garlic
Chicory Cinquefoil	Lambsquarters	Pusley, large flower	Wild lettuce
Clover, crimson	Lespedeza	Ragweed, bur	Wild marigold
Clover, alyce	Mallow, alkali	Ragweed, common	Wild mustard (yellow
Clover, hop	Mallow, bristly	Ragweed, lancleaf	(yellow)
Clover, rabbit foot	Mallow, common	Ragweed, western	Wild onion
Clover, red	Mallow, dwarf	Redstem filaree	Wild parsnip
Clover, strawberry	Mallow; venice	Rough cinquefoil	Wild radish
Clover, yellow sweet	Marcela	Scarlet pimpernel	Wild rape
Clover, white sweet	Matchweed	Shepard's purse	Wild strawberry
Clover, white	Mexicanweed	Smartweed, ladysthumb	Wild sweet potato
Cockle	Moneywort	Smartweed, pale	Wild violet
Cocklebur	Morningglory, bigroot	Smartweed, pennsylvania	Woodsorrel, creeping
Cocklebur, oriental	Morningglory, ivyleaf	Smooth chaff-flower	Woodsorrel, violet
Cocklebur, spiny	Morningglory, mexican	Smoothdock	Woodsorrel, yellow (Oxalis)
Common mullein	Morningglory, red	Sorrel, red (sheep)	Woolly croton
	1		

BROADLEAF WEEDS			
Corn Spurry	Morningglory, tall	Sowthistle, annual	Wormseed
Creeping Beggarweed	Morningglory, wolly	Sowthistle, spiny	Yarrow, common
Creeping Jenny (creeping	Mugwort	Spanish needles	Yarrow, western
charlie)		Speedwell, bi-lobed	Yarrow, yellow

# SUBLABEL 2 Proposed instructions for small trailer sprayers

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### 1. Use 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.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.
- Use on established lawns. Will not harm lawn grasses when used as directed (Do not use on carpetgrass, improved varieties of St. Augustinegrass, such as 'Floratam,' dichondra or desirable clovers)
- The turf tolerance of centipedegrass and St. Augustinegrass can range from sensitive to tolerant. Do not apply this product to 'Floratam' St. Augustinegrass in Florida.
- 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 liné 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 sprayer over lawn area
  only.

#### 2. How Much To Apply

Bahiagrass, Bermudagrass, Fescues, Kentucky Bluegrass, Perennial Ryegrass & Zoysiagrass: Spot Treatments: Mix 1 fl.oz. (2 Tbs) in 1 gallon of water to treat 250 sq.ft. Entire Lawn Treatments:

- Pump Style Sprayer: Mix 4 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.
- Hose-End Sprayer: Apply 4 fl.oz. per 1,000 sq.ft.
- [12 volt &] Tow-Behind Sprayers: Mix 4 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.

[Optional tabular presentation]

Table 1: Spot Treatment of Bahiagrass, Bermudagrass, Fescues, Kentucky Bluegrass, Perennial Ryegrass, & Zoysiagrass		
Tank Size	Concentrate to add to tank	Coverage Area
1 gal	1 fl.oz.	250 sq.ft.

Tank Size	Concentrate to add to tank	Coverage Area
1 gal	4 fl.oz.	1,000 sq.ft.
15 gal	60 fl.oz.	15,000 sq.ft.
25 gal	100 fl.oz.	25,000 sq.ft.

Centipedegrass & St. Augustinegrass:

Spot treatments: Mix 0.5 fl.oz. (1 Tbs) in 1 gallon of water to treat 250 sq.ft.

**Entire Lawn Treatments:** 

• Pump Style Sprayer: Mix 2 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.

• Hose-End Sprayer: Apply 2 fl.oz. per 1,000 sq.ft.

• [12 volt &] Tow-Behind Sprayers: Mix 2 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.

[Optional tabular presentation]

Table 3: Spot Treatment of Cer	ntipedegrass & St. Augustinegrass	
Tank Size	Concentrate to add to tank	Coverage Area
1 gal	1 fl.oz.	500 sq.ft.

	t of Centipedegrass & St. Augustinegrass	
Tank Size	Concentrate to add to tank	Coverage Area
1 gal	4 fl.oz.	2,000 sq.ft.
15 gal	60 fl.oz.	30,000 sq.ft.
25 gai	100 fl.oz.	50,000 sq.ft.

#### 3. How To Apply

#### 3.1 Pump Style Sprayers [sprayer icon]

Ideal for spraying individual weeds

- 1. Add the appropriate amount of water and concentrate to the sprayer tank.
- 2. Close sprayer, shake well, and pump handle to pressurize.
- 3. Adjust nozzle to deliver a coarse spray pattern.
- 4. To broadcast over large areas: apply evenly to treated area.
- 5. To treat individual weeds: spray to wet weed leaf surfaces.
- 6. Re-pressurize the sprayer as needed to maintain a good spray pattern.

#### 3.2 [12 Volt &] Tow-Behind Boom Sprayers [sprayer icon]

Ideal for treating large country and suburban lawns

- 1. To calibrate your application equipment consult your equipment owner's manual for speed and pressure settings required to deliver [0.5 to] 1 gallon of spray solution to treat 1,000 sq.ft. For example, at 4 mph a sprayer might deliver 1/2 gallon per 1,000 sq.ft. at 40 psi.
- 2. To apply evenly, drive at a constant speed that delivers the prescribed amount of spray required for the area to be treated.
- Mix the appropriate amount of product and water in the sprayer using the following tables as a guide.

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lanie 5:	112 VOIL &I PUII	Bening Sprayers:	: Application Guide	FOR BANIAGRASS	Bermugagrass	resches
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1/ 4 1	- Disserves - De	nameial Dirameaa	and Zavalassas			
Nentuck	v Bluegrass, Pe	renmai Kvedrass.	and Zovsiagrass			

Tank Size	Spray volume	Coverage Area	Concentrate to add to tank
45	0.5 gal/1000 sq.ft.	30,000 sq.ft.	120 fl.oz.
15 gal	1 gal/1000 sq.ft.	15,000 sq.ft.	60 fl.oz.
25	0.5 gal/1000 sq.ft.	50,000 sq.ft.	200 fl.oz.
25 gal	1 gal/1000 sq.ft.	25,000 sq.ft.	100 fl.oz.

Table 6: [12 Volt &] Pull Behind Sprayers: Application Guide For Centipedegrass and St Augustinegrass				
Tank Size	Spray volume	Coverage Area	Concentrate to add to tank	
45 - 1	0.5 gal/1000 sq.ft.	30,000 sq.ft.	60 fl.oz.	
15 gal	1 gal/1000 sq.ft.	15,000 sq.ft.	30 fl.oz.	
05 -1	0.5 gal/1000 sq.ft.	50,000 sq.ft.	100 fl.oz.	
25 gal	1 gal/1000 sq.ft.	25,000 sq.ft.	50 fl.oz.	

#### For spot treatments with [12 Volt &] Pull Behind Sprayers

See rates under How Much To Apply.

#### 3.3 Dial Style Hose-End Sprayers [sprayer icon]

Ideal for treating medium-sized lawns

- 1. Fill sprayer with sufficient concentrate to cover the total area to be treated. DO NOT ADD WATER,
- 2. Close sprayer and set dial to 1 oz.
- 3. Connect sprayer to hose
- 4. Extend hose to furthest point from faucet. Walking back towards the faucet, begin spraying, avoiding contact with the treated area.
- 5. Pour any unused product back into this container.

#### 3.4 Concentrate Plus Water Hose-End Sprayers [sprayer icon]

Ideal for treating medium-sized lawns

- 1. Fill sprayer with sufficient concentrate to cover the total area to be treated. Pour product into sprayer jar to the "Fluid Oz." level desired (See sprayer jar for markings)
- 2. Add the appropriate amount of water to the "Gallons" level indicated on the side of the sprayer jar. Close sprayer, connect to garden hose, shake well.
- Extend hose to furthest point from faucet. Walking back towards the faucet, begin spraying, avoiding contact with the treated area.

#### 4. Use Precautions

- Apply when weeds are young and actively growing.
- Apply 1 to 3 days after mowing.
- If the lawn is dry, water 24 hours before using this product.
- Do not water lawn within 24 hours after treatment.
- Certain hard-to-kill weeds may need to be spot treated in 30 days.
- For new lawns, apply only when grass has reached a height of at least 2 inches.
- Bare spots may be seeded 3 to 4 weeks after application.
- Spray when air temperatures are between 60° and 90°F with good soil moisture.
- Avoid applications during the spring transition of the warm season grasses and during periods of extremely high temperatures.

#### 5. Limitations

#### Broadcast applications to residential turfgrass:

The maximum application rate is 4.0 fl.oz. of product per 1,000 sq.ft. per application [0.74 lb 2,4-D ae, 0.18 lb MCPP-p ae and 0.08 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 8.0 fl.oz. of product per 1,000 sq.ft. [1.47 lb 2,4-D ae, 0.35 lb MCPP-p ae and 0.16 lb dicamba ae per acre].

### 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 4.0 fl.oz. per 1,000 sq.ft. per application [0.18 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. Weeds Killed		· · · · · · · · · · · · · · · · · · ·	
Amaranth, purple	Cupid shaving Brush	Mustard, ball	Speedwell, common
Amaranth, slender	Cudweed	Mustard, black	Speedwell, corn
Aster, heath	Daisy, English	Mustard, blue	Speedwell, ivyleaf
Aster, white heath	Daisy, oxeye	Mustard, hedge	Speedwell, persian
Aster, purple	Dandelion, common	Mustard, Indian,	Speedwell, purslane
Aster, white prairie	Dandelion, false	Mustard, tansy	Speedwell, slender
Artichoke	Day flower	Mustard, tumble	Speedwell, snow
Austrian fieldcress	Deadnettle	Mustard, white	Speedwell, thymeleaf
Bedstraw, Catchweed	Dichondra	Mustard, wormseed	Spiny amaranth
Bedstraw, smooth	Dock, broadleaf	Nettle, stinging (burning)	Spurge, spotted
Bedstraw, Northern	Dock, curly	Nettle, tall	Spurge, prostrate
Bedstraw, pineywoods	Dogbane	Nettle, wood	Spurweed
Beggarticks, hairy	Dogfennel	Parsley-piert	Star of Bethlehem
Betony, Florida	Dollarweed (Pennywort)	Parsnip	Strawberry, India mock
Bindweed, Field	Dove weed	Pearlwort	Tansy ragwort
Bindweed, Hedge	Elderberry	Pennycress (frenchweed)	Tanweed
Bitter Wintercress	Falseflax	Pepperweed, perennial	Thistle, blessed
Bittercress, hairy	False sunflower	Pepperweed, virginia	Thistle, bull
Bitterweed	Fiddleneck-	(Peppergrass)	Thistle, canada
Black-eyed Susan	Filaree, redstem	Pigweed, prostrate	Thistle, flodman (prairie)
Black Medic	Filaree, whitestem	Pigweed, redroot	Thistle, musk
Blood flower milkweed	Fleabane, daisy (annual)	Pigweed, russian	Thistle, platte
Blue lettuce	Fleabane, rough	Pigweed, smooth	Thistle, plumeless
Brassbuttons	Galinsoga, hairy	Pigweed, tumble	Thistle, russian
Bristly oxtongue	Galinsoga, smallflower	Pineapple weed	Thistle, scotch
Broomweed	Goldenrod	Plains coreopsis (tickseed)	Thistle, wavyleaf
Buckhorn	Ground ivy	Plantain, blackseed	Thistle, yellow (horrible)
Bullnettle	Groundsel	Plantain, bracted	Trailing crownvetch
Burclover	Gumweed	Plantain, broadleaf	Velvetleaf
Burdock	Hairy fleabane	Plantain, buckhorn	Vervain, blue
Burweed, lawn (spurweed)	Hawkweed, meadow	Plantain, hoary	Vervain, hoary
Buttercup, bulbous	Hawkweed, mouseear	Plantain, narrowleaf	Vervain, prostrate
Buttercup, creeping	Hawkweed, orange	Plantain, slender	Vervain, tall
Buttonweed, common	Hawkweed, yellow	Plantain, woolly	Vetch, bird
(poorjoe)	Healall	Poison ivy	Vetch, hairy
Buttonweed, virginia	Heartleaf drymary	Poison oak	Vetch, milk
Carolina geranium (wild)	Hemp	Pokeweed	Vetch, narrowleaf
Carpetweed	Henbit	Prairie Sunflower	Vetch, wild
Catnip	Hoary cress	Prickly lettuce (compass	Virginia creeper
Catsear, spotted (false	Horsenettle	plant)	Western clematis
dandelion)	Horseweed	Prickly sida	Western salsify
Chamber bitter	Jimsonweed	Prostrate knotweed	Wild aster
Chickweed, common	Johnny-Jumpup violet	Puncturevine	Wild buckweat
Chickweed, mouseear	Knawel	Purslane, common	Wild carrot
Chickweed, sticky	Knotweed, prostrate	Pusley, brazil	Wild four-o-clock
Chicory	Kochia	Pusley, florida	Wild garlic
Cinquefoil	Lambsquarters	Pusley, large flower	Wild lettuce
Clover, crimson	Lespedeza	Ragweed, bur	Wild marigold
Clover, chinson	Mallow, alkali	Ragweed, common	Wild mustard (yellow
Clover, hop	Mallow, bristly	Ragweed, lancleaf	rocket)
Clover, rabbit foot	Mallow, common	Ragweed, western	Wild onion
Clover, red	Mallow, dwarf	Redstem filaree	Wild parsnip
Clover, strawberry	Mallow, venice	Rough cinquefoil	Wild radish
Olover, duamberry	manon, romoc	[170 agri oniquoion	Tria radion

6. Weeds Killed			
Clover, yellow sweet	Marcela	Scarlet pimpernel	Wild rape
Clover, white sweet	Matchweed	Shepard's purse	Wild strawberry
Clover, white	Mexicanweed	Smartweed, ladysthumb	Wild sweet potato
Cockle	Moneywort	Smartweed, pale	Wild violet
Cocklebur	Morningglory, bigroot	Smartweed, pennsylvania	Woodsorrel, creeping
Cocklebur, oriental	Morningglory, ivyleaf	Smooth chaff-flower	Woodsorrel, violet
Cocklebur, spiny	Morningglory, mexican	Smoothdock	Woodsorrel, yellow (Oxalis)
Common mullein	Morningglory, red	Sorrel, red (sheep)	Woolly croton
Corn Spurry	Morningglory, tall	Sowthistle, annual	Wormseed
Creeping Beggarweed	Morningglory, wolly	Sowthistle, spiny	Yarrow, common
Creeping Jenny (creeping	Mugwort	Spanish needles	Yarrow, western
charlie)		Speedwell, bi-lobed	Yarrow, yellow

[Back Panel] [Restatement of information in sections 1 and 2.]

#### **Getting Started**

Kills:

Dandelion, Clover, Thistle and over [XXX] other weeds listed.

#### Where To Use:

On established lawns without harming lawn grasses when used as directed (Do not use on carpetgrass, improved varieties of St. Augustinegrass, such as 'Floratam,' dichondra or desirable clovers)

#### **Amount To Use:**

Bahiagrass, Bermudagrass, Fescues, Kentucky Bluegrass, Perennial Ryegrass & Zoysiagrass: Spot Treatments: Mix 1 fl.oz. (2 Tbs) in 1 gallon of water to treat 250 sq.ft.

**Entire Lawn Treatments:** 

- [Pump Style Sprayer:] Mix 4 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.
- Hose-End Sprayer: Apply 4 fl.oz. per 1,000 sq.ft. [See Inside Label for Sprayer Settings]
- [12 volt &] Tow-Behind Sprayers: Mix 4 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.

[Optional tabular presentation]

Table 1: Spot Treatment of Bal Ryegrass, & Zoysiagrass	hiagrass, Bermudagrass, Fescues, Kentuck	y Bluegrass, Perennial
Tank Size	Concentrate to add to tank	Coverage Area
1 gal	1 fl.oz.	250 sq.ft.

Table 2: Entire Lawn Treatment of Bahiagrass, Bermudagrass, Fescues, Kentucky Bluegrass, Perennial Ryegrass, & Zoysiagrass			
Tank Size	Concentrate to add to tank	Coverage Area	
1 gal	4 fl.oz.	1,000 sq.ft.	
. 15 gal	60 fl.oz.	15,000 sq.ft.	
25 gal	100 fl.oz.	25,000 sq.ft.	

Centipedegrass & St. Augustinegrass:

Spot treatments: Mix 0.5 fl.oz. (1 Tbs) in 1 gallon of water to treat 250 sq.ft.

**Entire Lawn Treatments:** 

- Pump Style Sprayer: Mix 2 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.
- Hose-End Sprayer: Apply 2 fl.oz. per 1,000 sq.ft. [See Inside Label for Sprayer Settings]
- [12 volt &] Tow-Behind Sprayers: Mix 2 fl.oz. in [0.5 to] 1 gallon of water to treat 1,000 sq.ft.

[Optional tabular presentation]

Table 3: Spot Treatment of Centipedegrass & St. Augustine			
Tank Size	Concentrate to add to tank	Coverage Area	
1 gal	1 fl.oz.	500 sq.ft.	

Table 4: Entire Lawn Treatment of Centipedegrass & St. Augustine			
Tank Size	Concentrate to add to tank	Coverage Area	
1 gal	4 fl.oz.	2,000 sq.ft.	
15 gal	60 fl.oz.	30,000 sq.ft.	
25 gal	100 fl.oz.	50,000 sq.ft.	

Coverage:

This [size] bottle treats XXXX sq.ft. of Bahiagrass, Bermudagrass, Fescues, Kentucky Bluegrass, Perennial Ryegrass & Zoysiagrass or YYYY sq.ft. of Centipedegrass & St. Augustinegrass.

Telephone icon Computer icon

For questions or comments call toll-free 1-800-821-7925 Mon. – Fri. 8:00 a.m. – 4:30 p.m. CST or visit our website at <a href="www.pbigordon.com">www.pbigordon.com</a> [www.GordonsUSA.com]

## **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: 1 pint to 2.5 gallons and 4 fl.oz. cartridges
  - EPA Est. No.
- 2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:
  - One quart covers up to 8,000 square feet.
  - Keep from freezing.
  - Controls dandelion, chickweed, knotweed, henbit, plantain, clover, spurge and many other broadleaf lawn weeds including those shown on the side panel.
  - Kills even the tough weeds...roots and all!
  - Controls even the tough weeds...roots and all!
  - Treats northern and southern grasses.
  - · Kills the root.
  - One quart treats up to 16,000 square feet. (Southern grasses)
  - · Water based.
  - One quart covers up to \_\_\_\_ square feet.
  - Won't harm lawn grass when used according to label directions.
  - Won't harm lawns\* \*When used as directed
  - Kills [Controls] XXX+ broadleaf weeds.
  - Starts working overnight
  - Won't harm lawn grass (when used as directed)
  - · Controls (Number) weeds!
  - Mixes with Water Concentrate
  - Treated areas for this container vary from 16,000 square feet (Northern Grasses) to 32,000 square feet (Southern Grasses)
  - CONTROLS
    - SENSITIVE WEEDS: Bedstraw, Black Medic, Buckhorn, Chickweed, Clover, Dandelion, Knotweed, Lambsquarters, Peppergrass, Plantain, Purslane, Ragweed, Sheperdspurse, and Wild Lettuce.
    - HARD-TO-KILL WEEDS: Chicory, Creeping Charlie, Creeping Jenny, Dock, Ground Ivy, Heal-All, Lespedeza, Mallow, Morningglory, Oxalis, Pigweed, Poison Ivy, Poison Oak, Sheep Sorrel, Speedwell, Spurge, Wild Carrot, Wild Onion, Yarrow and many other broadleaf weeds.
  - For 16 fl.oz. retail container: Lawn areas for this container vary from 4,000 sq.ft.(Northern grasses) to 8,000 sq.ft.(Southern grasses).
  - For 32 fl.oz. retail container: Lawn areas for this container vary from 8,000 sq.ft.(Northern grasses) to 16,000 sq.ft.(Southern grasses).
  - For One Gallon retail container: Lawn areas for this container vary from 32,000 sq.ft.(Northern grasses) to 64,000 sq.ft.(Southern grasses).
  - For outdoor use
  - Controls dandelion, spurge, chickweed and many other hard-to control weeds.
  - Controls dandelion, spurge, chickweed and many other listed weeds
  - Won't harm lawns when used as directed.
  - Contains Trimec® Herbicide
  - Kills Over XXX [Listed] Weeds\* -- [\*see inside booklet for a complete list of weeds controlled]
  - Bonus Size
  - 25% More Free!
  - Kills Over XXX Weeds in Country & Suburban Lawns\* \*See inside booklet for a complete list of weeds controlled

- Treats XXXX sq.ft. (YYYY sq.ft. for centipedegrass & St Augustinegrass
- · Guaranteed Results
- This product kills over XXX listed types of broadleaf weeds. The Trimec® formula goes beyond
  dandelions, clovers and chickweeds to stop even the toughest weeds like thistle and ragweed in
  country and suburban lawns.
- · Contains [XXX] cartridges
- Each [XX fl.oz.] cartridge makes XX gallons of spray
- · Kills the weeds, not the lawn
- · See results in hours
- See results in [X] hours
- Rainproof in hours
- Kills over 250 [listed] weeds [as listed]
- Kills 250+ [listed] weeds [as listed]
- Overnight results
- For use on [bahiagrass], [bermudagrass], [Kentucky bluegrass], [fescue], [perennial ryegrass], [zoysiagrass], [centipedegrass], and [St. Augustinegrass] lawns
- For use on warm and cool season grasses
- Kills broadleaf weeds
- [One quart] treats up to 8,000 sq. ft.(Northern grasses) [to] 16,000 sq. ft. (Southern grasses)\*
- One quart treats 8,000 to 16,000 sq.ft.\*
- Makes up to XXX[\*]
- \* When mixed XXX of product with YYY of water.
- Controls Weeds
- Concentrate

Container size	Treated area of Northern lawns or cool-season grass	Treated area of Southern lawns or warm-season grass
Cartridge 4 fl.oz.	1,000 sq.ft.	2,000 sq.ft.
1 pint (16 fl.oz.)	4,000 sq.ft.	8,000 sq.ft.
1 quart (32 fl.oz.)	8,000 sq.ft.	16,000 sq.ft.
2 quarts (64 fl.oz.)	16,000 sq.ft.	32,000 sq.ft.
3 quarts (96 fl.oz.)	24,000 sq.ft.	48,000 sq.ft.
1 gallon (128 fl.oz.)	32,000 sq.ft.	64,000 sq.ft.
2.5 gallons	80,000 sq.ft.	160,000 sq.ft.

## **DOCUMENT CONTROL INFORMATION**

1. Unique Label Identifier: 002217-00539.20140612.notif-proposed-clean

2. Reason for Issue: EPA Comments #1