

2217-543

8/27/2001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1/10

AUG 27 2001

Mr. Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, Missouri 64101

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
Trimec Herbicide (R) 20-0-0
EPA Registration No. 2217-543
Your Submission Dated May 23, 2001

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic forms [2-(2-methyl-4-chlorophenoxy)propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the basic and alternate Confidential Statement(s) of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and bearing that previously approved labeling for 18 months from the date of this letter.

A stamped copy of the labeling is enclosed for your records. This labeling supersedes all previously accepted labels. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

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

Enclosure

CONCURRENCES								
SYMBOL ▶	7505C							
SURNAME ▶	Miller							
DATE	8/27/01							

2/10

TRIMEC® HERBICIDE

For Sale To And Use By Professional Turf Maintenance Personnel, Landscaping Or Commercial Applicators Only. Not For Sale To Or Use By Homeowners.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	25.93%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	6.93%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid.....	2.76%
INERT INGREDIENTS:	<u>64.38%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

1.98 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 21.54%
 0.53 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 5.73%
 0.21 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 2.29%
 Isomer Specific by AOAC Method.
 Contains single isomer form of Mecoprop-p.
 TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

KEEP OUT OF REACH OF CHILDREN

DANGER

Statement of Practical Treatment

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.
IF ON SKIN: Wash with plenty of soap and water. Get medical attention.
IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.
IF INHALED: Remove victim to fresh air and apply respiration if indicated.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.
 See additional Precautionary Statements elsewhere on this label.

- KEEP FROM FREEZING -

NET CONTENTS: ONE U.S. GALLON

AP
 EPA REG. NO. 2217-543 Amend
 EPA Est. No. 2217-KS-1

MANUFACTURED BY:

 An Employee-Owned Company
 1217 West 12th Street
 Kansas City, Missouri 64101

ACCEPTED
 with COMMENTS
 In EPA Letter Dated

AUG 27 2001
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-543

2/10

SUBLABEL 1. Precautionary Statements and Directions for Use presented on the container label of Trimec® Classic Brand Broadleaf Herbicide.



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin. Avoid breathing vapors or spray mist.

FOR TURF SITES ONLY -

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried.

For use on residential and other turf sites excluding sod farms.

Clothing Requirement Statement:

When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow, and temple protection.

Personal Hygiene Statement:

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

Engineering Control Statements:

Containers over 1 gallon and less than 5 gallons: Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron.

Containers of 5 gallons or more: Do not open-pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. For terrestrial uses, do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater. Do not contaminate domestic or irrigation waters. Do not apply when weather conditions favor drift from target area.

When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

DIRECTIONS FOR USE

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

4/10

STORAGE & DISPOSAL

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

STORAGE: Store in original container in a locked storage area. Keep from freezing.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: *For Metal Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. *For Plastic Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke.

USE PRECAUTIONS/BROADLEAF WEEDS IN ORNAMENTAL LAWNS AND TURF:

Do not apply this product through any type of irrigation system. Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour spray solutions near desirable plants. Use only lawn type sprayers. Avoid fine sprays; coarse sprays are less likely to drift. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species. Do not apply to newly seeded grasses until well established. Do not broadcast apply when air temperatures exceed 85°F; some injury may be expected with spot treatments when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application. After using this product, clean sprayer with soap or detergent and rinse thoroughly before using other pesticides in it. Care should be taken not to make applications where runoff could contaminate bodies of water or spray drift could carry the chemical to food crops or grazing lands where cattle, sheep, goats, swine or poultry would be exposed.

Trimec® Herbicide is intended to be applied by lawn care operators and landscape personnel for use in ornamental lawns and turf established in institutional, ornamental, and residential/domestic sites. Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations including, but not limited to hospitals, nursing homes, schools, museums, libraries, sport facilities, golf courses, and office buildings. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial and institutional buildings. Finally, residential/domestic sites are defined as areas associated with the household or home life including, but not limited to apartment complexes, condominiums, and patient care areas of nursing homes, mental institutions, hospitals, or convalescent homes.

ORNAMENTAL LAWNS ESTABLISHED WITH COOL SEASON AND WARM SEASON TURFGRASSES:

Maximum control of weeds in cool season and warm season turfgrasses will be obtained from spring or early fall applications when weeds are actively growing. Do not use on carpetgrass, dichondra, nor on lawns or turf where desirable clovers are present.

Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application. Do not apply to newly seeded turf until after the second or third mowing. Grass seed can be sown 3 to 4 weeks after application at recommended rates.

The maximum application rate to turf is 1.0 lb. 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

General Application:

Cool Season Grasses, Common Bermudagrass, Bahiagrass, and Zoysiagrass - Apply 3.25 - 4.0 pints of product per acre with spray volumes of 20 - 260 gallons per acre (gpa). Or, apply 1.2 to 1.5 fluid ounces of product in 0.5 to 6 gallons of water per 1,000 square feet. Use the higher application rate with the higher spray volumes. The best time to control clover is in the fall. When making a spring application to control clover a 4 pints per acre rate is recommended.

5/10

Controlled Droplet Applicator (CDA):

Cool Season Grasses, Common Bermudagrass, Bahiagrass, and Zoysiagrass - Add 2.5 pints of product to the Herbi container and fill with water. Spray contents over 33,000 square feet. Avoid overlapping between spray patterns.

Hybrid Bermudagrass - Apply 2.0 - 4.0 pints of product per acre with spray volumes of 20 - 260 gallons per acre (gpa). Or, apply 0.75 to 1.5 fluid ounces of product in 0.5 to 6 gallons of water per 1,000 square feet. Use the higher application rate with the higher spray volumes.

Certain hybrid bermudagrasses vary in tolerance to this product. Contact your local Extension Service Weed Control Specialist for turfgrass tolerance to this product.

Bentgrass, Centipedegrass, and St. Augustinegrass - On closely mowed bentgrass (putting greens, bowling greens, and show lawns), apply a maximum rate of 1.0 fluid ounce of product per 1,500 square feet with spray volumes of 5.0 gallons per 1,500 square feet. Do not apply when grass is under stress from drought or hot temperatures. Use application equipment that is capable of distributing uniform droplets over the entire area to be sprayed. Slight yellowing of turf will disappear after about one week. Care should be taken to avoid overdosing bentgrasses or injury may result.

Some injury can be expected to turf when used on centipedegrass or St. Augustinegrass lawns; spot spray weeds established in centipedegrass and St. Augustinegrass to avoid damage that may occur from a broadcast treatment. Do not apply this product to St. Augustinegrass during spring green-up which is the transition period between dormancy and active growth. Cultivars of St. Augustinegrass vary in tolerance to this product. Do not apply this product to 'Floritam' St. Augustinegrass.

6/10

- BROADLEAF WEEDS -		
Aster, white heath & white prairie	Field oxeye-daisy (*creeping oxeye)	Poison oak
Bedstraw	Filaree, whitestem & redstem	Prostrate knotweed (*knotweed)
Beggarweed, creeping	Florida pusley	Puncturevine
Bindweed	Ground ivy	Purple cudweed
Black medic	Groundsel	Purslane
Broadleaf plantain	Hawkweed	Ragweed
Buckhorn plantain	Healall	Redweed
Bull thistle	Henbit	Red sorrel (*sheep sorrel)
Burclover	Innocence (Blue-eyed Mary)	Shepherdspurse
Burdock, common	Lambsquarters	Spotted spurge
Buttercup, creeping	Lawn burweed	Spurge
Carpetweed	Lespedeza, common	Thistle
Chickweed, common	Mallow, common	<i>Veronica</i> (*corn speedwell)
Chicory	Matchweed	Virginia buttonweed
Cinquefoil	Mouseear chickweed	White Clover (*Dutch clover, honeysuckle clover, white trefoil & purplewort)
Clover	Old world diamond flower	Wild carrot
Compassplant	<i>Oxalis</i> (*yellow woodsorrel & creeping woodsorrel)	Wild garlic
Curly dock	Parsley-piert	Wild geranium
Dandelion	Pennsylvania smartweed	Wild lettuce
Dayflower	Pennywort (*dollarweed)	Wild mustard
Deadnettle	Pepperweed	Wild onion
Dock	Pigweed	Wild strawberry
Dogfennel	Pineappleweed	Wild violet
English daisy	Plantain	Yarrow
False dandelion (*spotted catsear & common catsear)	Poison ivy	Yellow rocket
Field bindweed (*morningglory & creeping jenny)		

*Synonyms

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

7/10

SUBLABEL 2. Precautionary Statements and Directions for Use presented on the container label of Gordon's Brush Killer.



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin. Avoid breathing vapors or spray mist.

FOR INDUSTRIAL SITES ONLY -

Do not reenter or permit workers to reenter treated area until sprays have dried.

Clothing Requirement Statement:

When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks, and shoes. It is recommended that safety glasses include front, brow, and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.

Personal Hygiene Statement:

Wash hands, face, and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face, and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

Engineering Control Statement:

Containers over 1 gallon and less than 5 gallons: Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron.

Containers of 5 gallons or more: Do not open-pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. For terrestrial uses, do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater. Do not contaminate domestic or irrigation waters. Do not apply when weather conditions favor drift from target area.

When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

8/10

DIRECTIONS FOR USE

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

STORAGE & DISPOSAL

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

STORAGE: Store in original container in a locked storage area. Keep from freezing.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: *For Metal Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or if allowed by other procedures approved by state and local authorities. *For Plastic Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke.

USE PRECAUTIONS/BRUSH AND BROADLEAF WEEDS ALONG ROADSIDES, RIGHTS-OF-WAY, DRAINAGE DITCHBANKS AND OTHER SIMILAR NONCROP AREAS:

Do not apply this product through any type of irrigation system. Avoid spray drift to cotton, soybeans, tomatoes, tobacco, grapes, fruit trees, flowers or garden crops, and all other hormone herbicide-sensitive desirable plants. Do not apply near sensitive plants since small quantities of wind drifted herbicides may cause severe injury. Do not apply in areas underlaid by roots of desirable trees and shrubs. Do not apply herbicide when wind speed is sufficient to cause drift. Do not apply herbicide when an air temperature inversion exists. An air inversion may be detected by creating a smoke column and observing for a layering effect. Do not apply when temperatures exceed 85°F and humidity is high. To aid in avoiding spray drift use coarse sprays and low pressure. Do not use nozzles which produce fine spray droplets under high pressure. The use of thickening agents or anti-drift additives and drift reducing equipment is of value in preventing spray drift. Care should be taken not to make applications where runoff could contaminate bodies of water or spray drift could carry the chemical to food crops or grazing lands where cattle, sheep, goats, swine or poultry would be exposed.

BRUSH AND BROADLEAF WEEDS ALONG ROADSIDES, RIGHTS-OF-WAY, DRAINAGE DITCH BANKS AND OTHER SIMILAR NONCROP AREAS:

To effectively control brush, all leaves, stems and suckers must be thoroughly wetted to the ground. Apply when plants come into full leaf (spring) to the time plants begin to go dormant. Best results will be obtained when brush and weeds are young and actively growing. Do not cut brush or weeds until the herbicide has translocated throughout the plant causing root death.

General Application:

Apply 0.75 - 1.0 gallon of product per acre with spray volumes of 30 - 100 gallons per acre (2.25 to 3 fluid ounces of product in 1 to 3 gallons of water per 1,000 square feet). Heavy dense stands of brush and weeds may require the higher rate with the higher water volume. Use only application equipment that is capable of distributing uniform droplets over the entire area to be sprayed.

BRUSH:		
Ash	Elms	Oak
Aspen	Gooseberry	Shortleaf pine
Birches	Honey locust	Thistle
Black cherry	Kudzu	Willows
Brambles	Multiflora rose	

- BROADLEAF WEEDS -		
Aster, white heath & white prairie	Field oxeye-daisy (*creeping oxeye)	Poison oak
Bedstraw	Filaree, whitestem & redstem	Prostrate knotweed (*knotweed)
Beggarweed, creeping	Florida pusley	Puncturevine
Bindweed	Ground ivy	Purple cudweed
Black medic	Groundsel	Purslane
Broadleaf plantain	Hawkweed	Ragweed
Buckhorn plantain	Healall	Redweed
Bull thistle	Henbit	Red sorrel (*sheep sorrel)
Burclover	Innocence (Blue-eyed Mary)	Shepherdspurse
Burdock, common	Lambsquarters	Spotted spurge
Buttercup, creeping	Lawn burweed	Spurge
Carpetweed	Lespedeza, common	Thistle
Chickweed, common	Mallow, common	<i>Veronica</i> (*corn speedwell)
Chicory	Matchweed	Virginia buttonweed
Cinquefoil	Mouseear chickweed	White Clover (*Dutch clover, honeysuckle clover, white trefoil & purplewort)
Clover	Old world diamond flower	Wild carrot
Compassplant	<i>Oxalis</i> (*yellow woodsorrel & creeping woodsorrel)	Wild garlic
Curly dock	Parsley-piert	Wild geranium
Dandelion	Pennsylvania smartweed	Wild lettuce
Dayflower	Pennywort (*dollarweed)	Wild mustard
Deadnettle	Pepperweed	Wild onion
Dock	Pigweed	Wild strawberry
Dogfennel	Pineappleweed	Wild violet
English daisy	Plantain	Yarrow
False dandelion (*spotted catsear & common catsear)	Poison ivy	Yellow rocket
Field bindweed (*morninggloory & creeping jenny)		

*Synonyms

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

10/10

APPENDIX

i. Advertising claims that may be used: These claims may be presented on the retail container label or on the labeling accompanying the product.

- ◆ A broadleaf weed and brush killer
- ◆ Controls dandelion, chickweed, knotweed, plantain, henbit, spurge, ash, aspen, bramble, kudzu, oak, willow and other species of broadleaf weeds and brush; some of which are listed on this label.
- ◆ One gallon covers 2 to 2.5 acres