

2217-580

10/28/2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

PBI/Gordon Corporation
1217 West 12th Street
Kansas City, Missouri 64101

OCT 28 2009

Subject: EPA Reg. 2217-580 / Gordon's Trimec Weed and Feed 20 2,4-D RED Amendment

The labeling referred to above is in compliance with the 2,4-D RED and is 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) Please note: Final product reregistration can't be considered until after all active ingredients in this product are eligible for reregistration.
- 3) Per the acute toxicity review, "IF INHALED" statements must be added to the first aid section and the first aid statements must be placed on the label in the following order:

"IF ON SKIN OR CLOTHING:...

IF IN EYES:...

IF INHALED:

Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferable mouth-to-mouth if possible.

IF SWALLOWED:..."

- 4) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

"CAUTION

Harmful if absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear long-sleeved shirt, long pants, shoes, socks, and chemical-resistant gloves made of any waterproof material."

The text "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet" may remain in this section of the label.

- 5) Groundwater text ("This chemical has properties and characteristics associated with

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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") must be added to the alternate Environmental Hazard statements.

6) Delete "General" from "General Precautions". Update the Disposal section to comply with PR Notice 2007-4.

A stamped copy of the label is enclosed for your records. You must submit one copy of the final printed label before you release the product for shipment. Products shipped after 12 months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. Your release for shipment of the product constitutes acceptance of these conditions. This label supercedes all other previously accepted labels. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Sincerely,



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

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ACCEPTED
with COMMENTS
In EPA Letter Dated: OCT 28 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

GORDON'S TRIMEC® WEED & FEED 20

2217-580

EPA Reg. No. 2217-580

ACTIVE INGREDIENT:

2,4-dichlorophenoxyacetic acid	0.46%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	0.10%
Dicamba: 3,6-dichloro-o-anisic acid	0.04%
INERT INGREDIENTS:	<u>99.40%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 9.2 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.
- 2.0 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton.
- 0.8 lbs. 3,6-dichloro-o-anisic acid equivalent per ton.

Isomer Specific by AOAC Methods.
TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

First Aid	
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or on clothing:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
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.	



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. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent 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 dusts have settled.
- Do not use this product where desirable clovers are present or allow the material to drift onto flowers, vegetables or ornamental shrubbery. Apply when the air is calm. Do not apply to newly seeded lawns. During application, close spreader openings when turning.
- Do not use this product on or near desirable plants, and avoid spreading granules onto exposed root systems or adventitious shoots (rhizomes) 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. Apply this product directly to your lawn, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. 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.

INSTRUCTIONS:

Gordon's Trimec® Weed & Feed 20 controls a wide range of lawn weeds, including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. This product may be applied to established lawns of bermudagrass, bentgrass, bahiagrass, centipedegrass, Kentucky bluegrass, fescues, perennial ryegrass, zoysiagrass, and St. Augustinegrass. Do not apply to dichondra or carpetgrass. Do not apply this product to 'Floritam' St. Augustinegrass in Florida. In addition, a 16-4-8 fertilizer provides a supply of plant nutrients or plant food.

Possible retreatment may be necessary if (a) lawn is heavily overrun by weeds, or (b) if adverse low moisture conditions prevail and weeds are in a state of poor growth. A second application may be made in 30 days.

The maximum broadcast application rate is 6.0 pounds of product per 1,000 sq.ft. per application (1.2 lbs 2,4-D ae, 0.27 lb MCP-P ae and 0.11 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 12.0 pounds of product per 1,000 sq.ft. (2.4 lbs 2,4-D ae, 0.54 lb MCP-P ae and 0.22 lb dicamba ae per acre).

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering (see step 4).
3. Apply when weeds are young and actively growing, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to allow the granules to adhere and to remain on the leaf surface of the weeds.
4. Do not wash from weed leaves for 1 to 2 days after application. At this time a thorough watering should be made.

SPREADERS AND CALIBRATION:

1. Drop spreaders and rotary spreaders must be calibrated for accurate applications of this product.
2. Close spreader opening (orifice).
3. Adjust spreader settings using the spreader settings in the following chart.

Spreader Settings	
Scott	6
Lawn Beauty	5
Jackson	7.5
Sears	4

The above spreader settings are approximate.

20 pound bag: Calibrate your spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet. Application rate: 4.0 pounds of product/ 1,000 sq.ft.

25 pound bag: Calibrate your spreader on 200 square feet and adjust to apply at the rate of 1 pound of product per 200 square feet. Application rate: 5.0 pounds of product/ 1,000 sq.ft.

30 pound bag: Calibrate your spreader on 166 square feet and adjust to apply at the rate of 1 pound of product per 166 square feet. Application rate: 6.0 pounds of product/ 1,000 sq.ft.

GUARANTEED ANALYSIS 16-4-8	
Total Nitrogen (N)	16%
Water Insoluble Nitrogen	5%
Available Phosphate (P2O5)	4%
Soluble Potash (K2O)	8%

Fertilizer Labeling Requirements:

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.xxx.com>.

WEEDS			
Bedstraw	Ground ivy	Peppergrass	Shepherdspurse
Black medic	Healall	Pigweed	Speedwell
Buckhorn	Henbit	Plantain	Spurge
Burdock	Knotweed	Poison ivy	Thistle
Chickweed	Lambsquarters	Poison oak	Wild carrot
Chicory	Lespedeza	Purslane	Wild garlic
Clover	Mallow	Ragweed	Wild lettuce
Dandelion	Morningglory	Scarlet pimpernel	Wild onion
Dock	Oxalis (yellow woodsorrel)	Sheep sorrel	Yarrow

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals. Do not store near food or feedstuffs.

PESTICIDE DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency or toll free number (1-800-XXX-XXXX) 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 Weight _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- **Approved Fertilizer Grades:** The following guaranteed analyses presentations have previously been submitted as notifications. Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5, and K2O include the following:

12-3-5	15-5-7	16-4-8	21-2-4	23-3-5	26-0-7
12-4-8	15-7-7	20-2-4	22-2-4	25-3-3	28-3-3

- The fertilizer grade guaranteed analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.
- For fertilizers containing iron, supplemental registrants may add one of the following statements:
 - 1) This product may stain concrete and stone, where spilling occurs, sweep off immediately, then flush with water.
 - 2) Sweep all residue from concrete surfaces immediately after application. The iron content in this product will stain sidewalks, patios, driveways, swimming pools and deck coatings if not removed before watering. Seller nor distributor assumes any responsibility for damage incurred to any surface other than product's intended use.
 - 3) Keep this product off sidewalks, patios, and driveways. This fertilizer contains iron which will stain concrete and painted surfaces. If it comes in contact with concrete surface, sweep off.

immediately before flushing with water. If concrete is wet when contact occurs staining may be impossible to prevent. Be careful when using rotary spreaders which scatter fertilizer beyond lawn edge and onto concrete.

• **Container Packaging and Size:**

Note to Supplemental Registrants: Select the appropriate bag size and present only the information provided for that bag size on your product labeling.

Bag Size, Pounds	Desired Application Rates		Treated Area for This Bag Size, sq.ft.
	Pounds/Area (sq.ft.)	Pounds/1000 sq.ft.	
20	1/250	4.0	5,000
	1/200	5.0	4,000
	1/166	6.0	3,333
25	1/250	4.0	6,250
	1/200	5.0	5,000
	1/166	6.0	4,167
30	1/250	4.0	7,500
	1/200	5.0	6,000
	1/166	6.0	5,000
40	1/250	4.0	10,000
	1/200	5.0	8,000
	1/166	6.0	6,667
50	1/250	4.0	12,500
	1/200	5.0	10,000
	1/166	6.0	8,333

• **Guarantee of customer satisfaction to be offered by supplemental registrants:**

- **SATISFACTION GUARANTEED OR YOUR MONEY BACK.** If you apply (Brand Name) as directed and are not completely satisfied, send proof of purchase from this package and a cash register receipt to the address on the front of the bag. We will promptly refund your money.
- **Guarantee of Satisfaction:** If this (Company Name) product is not performing to your satisfaction, please send proof of purchase and a brief description of your problem to (Company Name and address), for a prompt response. Also enclose a daytime telephone number.

- _____ pounds of product cover up to _____ square feet of turf.
- Controls (Kills) over (Number) weeds and builds a vigorous green lawn in one application.
- Provides lawns with a deep green color.
- Kills (Controls) dandelion, spurge and many other broadleaf weeds.
- Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge and many other broadleaf weeds including those listed on the back panel.
- Kills (Controls) the weeds and feeds the lawn in one easy application.
- Also for other grass lawns including fescue and bermudagrass.
- Contains Trimec® Herbicide.
- Longer lasting fertilizer formula.
- Banish weeds and enjoy a greener lawn that looks as good as it feels.
- Plus a quick greening lawn fertilizer.
- Information on Weed Control in Lawns.
 - Control existing broadleaf weeds with (Brand Name) containing Trimec® Herbicide during the growing season.
 - Control existing broadleaf weeds with Bandini Super Green Weed & Feed, Bandini St. Augustine Weed & Feed, & Bandini Super Plush Weed & Feed during the growing season.
 - Stop broadleaf weeds seeds before they sprout with (Brand Name), September through March/April.
 - Stop broadleaf weeds seeds before they sprout with Bandini Pre-Sprout 1, applications made September through April.

- Stop annual weed grass seeds before they sprout with (Brand Name), August through March/April.
- Stop annual weed grass seeds before they sprout with Bandini Pre-Sprout 2 applications made August through April.
- Promotes thick, green lawns.
- Fertilizes & controls broadleaf weeds in one easy step.
- Controls (Kills) most major broadleaf weeds.
- Kills (Controls) many broadleaf weeds
- Also for other grass lawns
- Provides deep green color
- Covers [up to] _____ sq.ft.
- A (X-X-X) fertilizer provides a balanced supply of plant food needed for a normal season's growth.
- [Alternate Spreader Listing and Graphics]: Bandini - XX; Vigoro 4000 Rotary - XX; Scotts Drop - XX; Vigoro 4000 Drop - XX
- Controls (Kills) (Number) weeds! (Listing of weeds may include the following.)
- (Listing of weeds may include the following.)

WEEDS			
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	Shepherdspurge	Wild vetch

WEEDS			
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

DOCUMENT CONTROL INFORMATION

- 1. Unique Label Identifier:** 002217-00580.20081105.proposed.doc
- 2. Reason for Issue:** Various changes pertaining to re-registration. Re-format label.