

2217-585

7/7/2010

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

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

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Kansas City, MO 64101-0090

JUL -7 2010

Subject: Label Amendment – Response to PBI/Gordon’s Rebuttal of Reregistration letter dated February 6, 2009 that required changing the signal word from “Caution” to “Danger”  
Product Name: Gordon’s Broadleaf and Poison Ivy Spot-Weeder  
EPA Registration Number: 2217-585  
Decision Number: 429693

The label amendment referred to above (maintaining the “Caution” signal word and associated language), submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provide the following changes are made to the product label:

- 1) Per the acute toxicity review completed in the Registration Division, revise the ‘Hazards to Humans and Domestic Animals’ statement to read as follows:  
“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.”
- 2) Replace “Inert Ingredients” with “Other Ingredients” in the ingredient statement.

**Note:** While no additional data is being requested at this time, marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting marketing claims made on the product label is not available then those claims must be removed.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment.

Sincerely,

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)



<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 on skin or on clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</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 contact 1-877-800-5556 for emergency medical treatment advice.	

**Environmental Hazards**

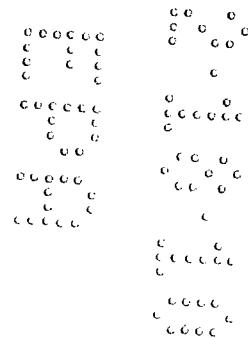
This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water.

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.]



4089

**SUBLABEL 1**

**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.
- Clovers, bentgrass and St. Augustinegrass may be injured if contacted. Do not use on dichondra lawns.
- 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.

**NO MIXING OR POURING - AIM AT WEED AND SPRAY**

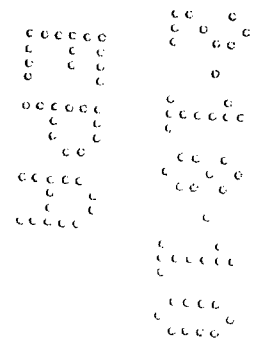
Use to kill poison ivy and any other troublesome broadleaf weeds. For best results use Gordon's Broadleaf and Poison Ivy Spot Weeder when weeds are actively growing. Rainfall or watering soon after application may reduce effectiveness.

Gordon's Broadleaf and Poison Ivy Spot Weeder is designed to permit easy treatment of small weed patches without mess or trouble and without bending or stooping. Wet poison ivy or other weeds thoroughly using short bursts of spray. Overspraying only wastes the spray. Effects begin to show in a few days and weeds slowly die and disappear.

The number of spot treatments is limited to 2 per year. Minimum of 30 days between applications.

**ALSO KILLS:**

Bedstraw	Dollarweed	Henbit	Plantain
Black medic (Yellow clover)	English daisy	Knotweed	Poison ivy
Buckhorn	Filaree	Lambsquarters	Prickly lettuce
Canada thistle	Fleabane	Matchweed	Purslane
Chickweed	Florida pusley	Mustard	Ragweed
Clover	Ground ivy (Creeping Charlie)	Pennywort	Sheep sorrel
Cudweed	Healall	Pepperweed	Shepherdspurse
Curled dock		Pigweed	Yarrow
Dandelion			



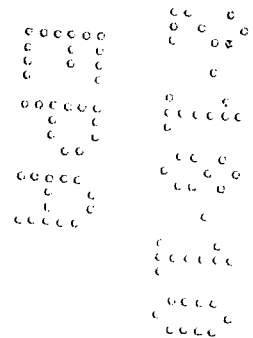
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## STORAGE AND DISPOSAL

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 domestic animals.

**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 [www.website.com](http://www.website.com) for disposal instructions. Never place unused product down any indoor or outdoor drain.



W079

**SUBLABEL 2**

**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 apply to garden plants, flowers or shrubs.
- Do not use this product on carpetgrass, dichondra, nor on lawns with desirable clovers.
- 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.

**PRODUCT DESCRIPTION:**

Gordon's Broadleaf and Poison Ivy 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 weeds commonly found in home (residential) lawns. This ready-to-use herbicide is intended for spot treatments only. Weeds that have not emerged at the time of application will not be controlled.

**WHERE TO USE:**

**Northern Grasses** - Kentucky bluegrass, perennial ryegrass and fescues.

**Southern Grasses** - St. Augustinegrass, centipedegrass, bentgrass, bahiagrass, bermudagrass and zoysiagrass.

**HOW TO USE:**

Use to spot treat weeds in the lawn. Gordon's Broadleaf and Poison Ivy Spot Weeder is designed for easy treatment of small weed patches without mess or trouble and without bending or stooping.

**NO MIXING OR POURING - AIM AT WEED AND SPRAY**

For best results, use Gordon's Broadleaf and Poison Ivy Spot Weeder when weeds are actively growing. Rainfall or watering soon after application may reduce effectiveness.

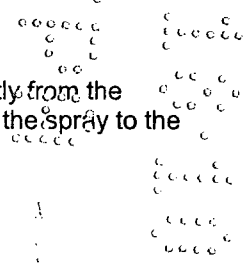
The number of spot treatments is limited to 2 per year. Minimum of 30 days between applications.

**FOR CONTAINERS WITH TRIGGER SPRAYERS:**

Gordon's Broadleaf and Poison Ivy Spot Weeder is ready-to-use and is applied directly from the container fitted with the trigger sprayer. Direct the spray to the target weeds to provide uniform coverage of the upper leaf surfaces. [OR: Wet the broadleaf weeds thoroughly using short bursts of spray.] Usually, two (2) pumps of this trigger sprayer will provide adequate coverage of individual weeds. Excessive spraying can injure some lawns. [OR: Overspraying may injure lawns including bentgrass, centipedegrass, and St. Augustinegrass.]

**FOR REFILL CONTAINERS:**

Gordon's Broadleaf and Poison Ivy Spot Weeder is ready-to-use and is applied directly from the container. Remove the cap from the container and attach the trigger sprayer. Direct the spray to the



7049

target weeds to provide uniform coverage of the upper leaf surfaces. [OR: Wet the broadleaf weeds thoroughly using short bursts of spray.] Excessive spraying can injure some lawns. [OR: Overspraying may injure lawns including bentgrass, centipedegrass, and St. Augustinegrass.]

**CARE AND INSTRUCTIONS FOR TRIGGER SPRAYERS**

**OPERATION:**

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.

**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

Use Gordon's Broadleaf and Poison Ivy Spot Weeder to kill poison ivy and any other troublesome broadleaf weeds.

WEEDS			
Annual yellow sweetclover	Cockle	Musk thistle	Spiny cocklebur
Aster	Cocklebur	Mustard	Spiny sowthistle
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spotted catsear
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted spurge
Beggarticks	Cudweed	Nettle	Spurweed
Betony, Florida	Curly dock	Orange hawkweed	Stinging nettle
Bindweed, field	Daisy, English	Oriental cocklebur	Strawberry, India mock
Bird vetch	Daisy fleabane	Oxalis	Tall nettle
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall vervain
Bittercress, hairy	Dandelion	Parsnip	Tansy ragwort
Bitterweed	Dichondra	Pearlwort	Tansy mustard
Black-eyed Susan	Dogbane	Pennycress	Tanweed
Black medic	Dogfennel	Pennywort	Thistle
Black mustard	Dollarweed	Pepperweed	Trailing crownvetch
Blackseed plantain	Elderberry	Pigweed	Tumble mustard
Blessed thistle	False dandelion	Pineywoods bedstraw	Tumble pigweed
Bloodflower milkweed	Falseflax	Plains coreopsis (tickseed)	Velvetleaf
Blue lettuce	False sunflower	Plantain	Venice mallow
Blue vervain	Fiddleneck	Poison ivy	Virginia buttonweed
Bracted plantain	Florida pusley	Poison oak	Virginia creeper
Brassbuttons	Frenchweed	Pokeweed	Virginia pepperweed
Bristly oxtongue	Galinsoga	Poorjoe	Water pennywort
Broadleaf dock	Goathead	Prairie sunflower	Wavyleaf bullthistle
Broadleaf plantain	Goldenrod	Prickly lettuce	Western clematis
Broomweed	Ground ivy	Prickly sida	Western salify

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8049

WEEDS			
Buckhorn	Gumweed	Prostrate knotweed	White mustard
Buckhorn plantain	Hairy fleabane	Prostrate pigweed	Wild aster
Bulbous buttercup	Hawkweed	Prostrate spurge	Wild buckwheat
Bull thistle	Healall	Prostrate vervain	Wild carrot
Bullnettle	Heartleaf drymary	Puncturevine	Wild four-o'clock
Burclover	Heath aster	Purslane, common	Wild garlic
Burdock	Hedge bindweed	Ragweed	Wild geranium
Burning nettle	Hedge mustard	Red sorrel	Wild lettuce
Burweed	Hemp	Redroot pigweed	Wild marigold
Buttercup	Henbit	Redstem filaree	Wild mustard
Buttonweed	Hoary cress	Rough cinquefoil	Wild onion
Canada thistle	Hoary plantain	Rough fleabane	Wild parsnip
Carolina geranium	Hoary vervain	Russian pigweed	Wild radish
Carpetweed	Horsenettle	Russian thistle	Wild rape
Catchweed bedstraw	Jimsonweed	Scarlet pimpernel	Wild strawberry
Catnip	Knawel	Scotch thistle	Wild sweet potato
Catsear	Knotweed	Sheep sorrel	Wild vetch
Chickweed, common	Kochia	Shepherdspurse	Woodsorrel
Chickweed, mouseear	Lambsquarters	Slender plantain	Woolly croton
Chicory	Lespedeza	Smallflower galinsoga	Woolly morningglory
Cinquefoil	Mallow	Smooth dock	Woolly plantain
Clover, crimson	Matchweed	Smooth pigweed	Wormseed
Clover, hop	Mexicanweed	Sorrel	Yarrow
Clover, red	Milk vetch	Sowthistle	Yellow rocket
Clover, strawberry	Morningglory	Spanishneedles	Yellowflower pepperweed
Clover, sweet	Mouseear hawkweed	Speedwell	and other
Clover, white	Mugwort	Spiny amaranth	broadleaf weeds

**STORAGE AND DISPOSAL**

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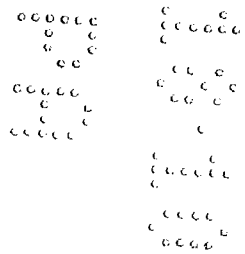
**PESTICIDE STORAGE:** Keep from freezing. Store in original container in a locked storage area inaccessible to children and domestic animals.

**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 [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:

- No mixing - No pouring
- Ready-To-Use - Aim at weed and spray.
- Contains TRIMEC®
- TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.
- Kills [Controls] (Number) weed types, roots and all
- Water-based or Water-based formulation
- Kills the weeds, not the lawn
- Kills the root.
- Kills the entire weed or plant roots and all.
- Kills [Controls] a wide range of broadleaf weeds roots and all.
- Kills [Controls] (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
- Good Housekeeping Seal of Approval



- The Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, expressed or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Manufacturer, and Buyer assumes the risk of any such use.
- Fast acting formula
- Rainproof in hours
- Kills to the root
- Ready To Use

# DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00585.20100215.resub-proposed-clean.doc

2. Reason for Issue: Respond to EPA comments, PRN 2007-4

