

2217-597

01/03/2003

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

JAN 3 2003

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Craig Martens  
PBI Gordon Corporation  
P.O. Box 014090  
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p  
Gordon's Trimec 849 General Broadleaf Lawn Herbicide  
EPA Registration Number: 2217-597  
Your Submission Dated October 14, 2002

The Agency is conditionally approving an amendment to the registration for 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 form [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 and Confidential Statements of Formula (CSFs) submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to product other than those specified within the body of your certification statement and cover letter dated October 14, 2002. 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 the previously approved labeling for 18 months from the date of this letter.
3. Update the labeling to include the following corrections:
  - Since the Precaution Statements indicate that this product is harmful if inhaled, add the following First Aid text:

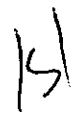
|                   |  |
|-------------------|--|
| <b>If inhaled</b> | <ul style="list-style-type: none"> <li>•Move person to fresh air.</li> <li>•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>•Call a poison control center or doctor for further treatment advice.</li> </ul> |
|-------------------|--|

A copy of the revised CSF (Basic Formation dated October 14, 2002) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,



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

Enclosure

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# GORDON'S TRIMEC® 849 GENERAL BROADLEAF LAWN HERBICIDE

**ACTIVE INGREDIENTS:**

|  |                |
|--|----------------|
| Dimethylamine salt of (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid | 5.45%          |
| Dimethylamine salt of 2,4-dichlorophenoxyacetic acid .....               | 5.88%          |
| Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid) .....         | 1.21%          |
| <b>INERT INGREDIENTS: .....</b>  | <b>87.46%</b>  |
| <b>TOTAL</b>   | <b>100.00%</b> |

This product contains:

039 lb. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 4.50%

0.42 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 4.88%

0.09 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 1.00%

Isomer Specific by AOAC Methods.

Contains the single isomer form of Mecoprop-p.

**KEEP OUT OF REACH OF CHILDREN**

**D A N G E R**

See side panels for additional Precautionary Statements  
and First Aid Statement of Practical Treatment

**-KEEP FROM FREEZING-**

NET CONTENTS: ONE QUART

849/ AP  
EPA REG NO 2217-597  
EPA EST NO 2217-KS-1  
MANUFACTURED BY:



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

Telephone 1-800-821-7925

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

JAN 3 2003

**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
2217-597**



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

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**DANGER:** Corrosive. Causes eye damage. Do not get in eyes or on skin or clothing. Wear goggles when applying this product. Harmful if swallowed or inhaled. Avoid exposure to spray mist. When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection.

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.

**Statement of Practical Treatment**

**FIRST AID**— In case of eye contact, immediately flush eyes with plenty of water for 15 minutes. Consult a physician immediately.

**First Aid**

|   |  |
|---|--|
| <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 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 a 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. For additional information in case of emergency, call toll free 1-877-800-5556. |  |
| Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.  |  |

*If shown*

**ENVIRONMENTAL HAZARDS:**

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater. Do not apply when weather conditions favor drift from target area.

**DIRECTIONS FOR USE**

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

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

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## STORAGE & DISPOSAL

**STORAGE:** Keep from freezing. Store in original container and place in locked storage area when not using.

~~**PESTICIDE DISPOSAL:** Securely wrap original container in several layers of newspaper and discard in trash.~~

~~**CONTAINER DISPOSAL:** Do not reuse container. Rinse thoroughly before discarding in trash.~~

**CONTAINER 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-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

**WHEN TO USE:**

Spray at any time when weeds are growing. For best results, apply in spring when weeds are small and growing rapidly. Apply in fall to remove late germinating weeds.

**HOW TO USE:**

The maximum application rate to turf is 0.6 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

**Hose End Sprayer:**

Use 1 gallon of water for every 250 square feet to be sprayed. For concentrate sprayers add only the required amount of Gordon's Trimec® 849 General Broadleaf Lawn Herbicide listed in the rate chart depending on type of grass and number of square feet to be treated. Do not add water to concentrate sprayers. For dilution sprayers, add the required amount of Gordon's Trimec® 849 General Broadleaf Lawn Herbicide and fill sprayer with water to proper level. Spray uniformly.

**Pressure Sprayer:**

Use ½ gallon of water for every 250 square feet to be sprayed. Add the required amount of Gordon's Trimec® 849 General Broadleaf Lawn Herbicide listed in the rate chart for the type of grass to be treated and fill sprayer with water to the proper level. Adjust spray nozzle to deliver coarse spray. Spray uniformly.

**Spot Treatment:**

If hardy weeds persist in sensitive grasses such as St. Augustinegrass, centipedegrass, bermudagrass, buffalograss, or bentgrass, spot treat individual weeds using 1 teaspoon of Gordon's Trimec® 849 General Broadleaf Lawn Herbicide in 1 quart of water (equivalent to 4 teaspoons per gallon of water). Minimize contact of grass.

**RATES OF GORDON'S TRIMEC® 849 GENERAL BROADLEAF LAWN HERBICIDE FOR VARIOUS LAWN GRASSES:**

| Gallons of Water Spray |                  | Area to Treat (sq. ft.) | St. Augustinegrass, Centipedegrass (fl. oz.) | Bermudagrass, Buffalograss, Bentgrass (fl.oz.) | Bluegrass, Zoysiagrass, Fescue (fl. oz.) |
|------------------------|------------------|-------------------------|--|--|--|
| Hose End Sprayer       | Pressure Sprayer |                         |  |  |  |
| 1                      | ½                | 250                     | ½  | 2/3  | 2/3 to 1                                 |
| 4                      | 2                | 1,000                   | 2  | 2 2/3  | 2 2/3 to 4                               |
| 8                      | 4                | 2,000                   | 4  | 5 1/3  | 5 1/3 to 8                               |
| 20                     | 10               | 5,000                   | 10   | 13 1/3   | 13 1/3 to 20                             |
| 32                     | 16               | 8,000                   | 16   | 21 1/3   | 21 1/3 to 32                             |

**EQUAL MEASURES:** 1 fluid ounce (fl.oz.) = 2 tablespoons (Tbs.) or 6 teaspoons (tsp.)  
 2 fluid ounces = 4 tablespoons 4 fluid ounces = ½ cup 8 fluid ounces = 1 cup  
 16 fluid ounces = 1 pint (pt.) 32 fluid ounces = 1 quart (qt.)

**HOW TO USE IN THE LAWN WEED KILLER APPLICATOR:**

1. Connect sprayer nozzle to garden hose; remove safety cap from container and insert sprayer unit, securing tightly.
2. Turn on water; place finger over hole on right side of nozzle and product will automatically be dispersed.
3. Spray evenly and uniformly over area requiring application. (Check application guide to determine the correct area to be covered per ounce.)

**\*APPLICATION GUIDE**

| Fluid Ounces | Recommended Coverage Area Per Ounce                                      |  |  |
|--------------|--|--|--|
|              | Sensitive grasses such as Centipedegrass and St. Augustinegrass (sq.ft.) | Bermudagrass, Bentgrass, and Buffalograss (sq.ft.) | Bluegrass, Fescue, and Zoysiagrass (sq. ft.) |
| 1            | 500  | 375  | 250  |
| 2            | 100  | 750  | 500  |
| 3            | 150  | 1,125  | 750  |
| 4            | 2,000  | 1,500  | 1,000  |
| 5            | 2,500  | 1,875  | 1,250  |
| 6            | 3,000  | 2,250  | 1,500  |
| 7            | 3,500  | 2,525  | 1,750  |
| 8            | 4,000  | 3,000  | 2,000  |
| 9            | 4,500  | 3,375  | 2,250  |
| 10           | 5,000  | 3,750  | 2,500  |
| 11           | 5,500  | 4,125  | 2,750  |
| 12           | 6,000  | 4,500  | 3,000  |
| 13           | 6,500  | 4,875  | 3,250  |
| 14           | 7,000  | 5,250  | 3,500  |
| 15           | 7,500  | 5,625  | 3,750  |
| 16           | 8,000  | 6,000  | 4,000  |

\*Good for this precalibrated sprayer only.

**USE PRECAUTIONS:**

Do not apply this product through any type of irrigation system. Use only lawn sprayer that delivers coarse spray to reduce drift. Avoid spray drift to vegetables, flowers, ornamental plants. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within dripline of tree and other ornamental species. Do not spray carpetgrass, dichondra, or lawn where desirable clovers are present. Do not apply this product to "Floritam" St. Augustinegrass in Florida. Do not apply to newly seeded lawn grasses until well established. Do not spray 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 water, and rinse thoroughly before applying other pesticides. Failure to follow above precautions may result in injury.

**GENERAL INFORMATION:**

Gordon's Trimec® 849 General Broadleaf Lawn Herbicide controls troublesome common lawn weeds, including poison ivy, in both northern and southern grasses.

**- BROADLEAF WEEDS -**

|                           |                   |                       |                           |
|---------------------------|-------------------|-----------------------|---------------------------|
| Annual yellow sweetclover | Cockle            | Musk thistle          | Spiny amaranth            |
| Aster                     | Cocklebur         | Mustard               | Spiny cocklebur           |
| Austrian fieldcress       | Common mullein    | Narrowleaf plantain   | Spiny sowthistle          |
| Bedstraw                  | Creeping jenny    | Narrowleaf vetch      | Spotted catsear           |
| Beggarticks               | Cudweed           | Nettle                | Spotted spurge            |
| Betony, Florida           | Curly dock        | Orange hawkweed       | Spurweed                  |
| Bindweed, field           | Daisy, English    | Oriental cocklebur    | Stinging nettle           |
| Bird vetch                | Daisy fleabane    | Oxalis                | Strawberry, India mock    |
| Bitter wintercress        | Daisy, oxeye      | Parsley-piert         | Tall nettle               |
| Bittercress, hairy        | Dandelion         | Parsnip               | Tall vervain              |
| Bitterweed                | Dichondra         | Pearlwort             | Tansy ragwort             |
| Black-eyed Susan          |                   | Pennycress            | Tansy mustard             |
| Black medic               | Dogfennel         | Pennywort             | Tanweed                   |
| Black mustard             | Dollarweed        |                       | Thistle                   |
| Blackseed plantain        |                   | Pepperweed            | Trailing crownvetch       |
| Blessed thistle           | False dandelion   | Pigweed               | Tumble mustard            |
| Bloodflower milkweed      | Falseflax         | Pineywoods bedstraw   | Tumble pigweed            |
| Blue lettuce              | False sunflower   | Plains coreopsis      | Velvetleaf                |
| Blue vervain              | Fiddleneck        | Plantain              | Venice mallow             |
| Bracted plantain          | Florida pusley    | Poison ivy            | Virginia buttonweed       |
|                           | Frenchweed        | Poison oak            | Virginia creeper          |
|                           | Galinsoga         | Pokeweed              | Virginia pepperweed       |
| Bristly oxtongue          |                   | Poorjoe               |                           |
| Broadleaf dock            |                   | Prairie sunflower     | Wavyleaf bullthistle      |
| Broadleaf plantain        | Goldenrod         | Prickly lettuce       | Western clematis          |
| Broomweed                 | Ground ivy        | Prickly sida          | Western salsify           |
| 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                 | Heathaster        | Purslane, common      | Wild garlic               |
| Burdock                   | Hedge bindweed    | Ragweed               | Wild geranium             |
| Burning nettle            | Hedge mustard     | Red sorrel            | Wild lettuce              |
| Burweed                   |                   | 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 broadleaf weeds |
| Clover, white             | Mugwort           |                       |                           |



**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.

**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.

- ◆ One quart covers 8,000 to 16,000 square feet.
- ◆ Controls 34 troublesome weeds in lawns.
- ◆ This concentrated formulation covers up to 16,000 square feet per quart.
- ◆ One quart of product may treat up to 16,000 square feet of lawns established with St. Augustinegrass and centipedegrass.
- ◆ Kills (Controls) troublesome weeds, dandelion, chickweed, clover, and many others.
- ◆ Contains TRIMEC® Herbicide.