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2217-602

Page 1 of 7
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 16 1996

Mr. James A. Armbruster, Ph.D.
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 14090
Kansas City, Missouri 64101

Dear Dr. Armbruster:

SUBJECT: (1) Label Amendment - Conversion from Manufacturing-Use to End-Use Product for Turfgrass;
(2) Product Name Change; and
(3) Updated Confidential Statement of Formula.
Trimec Herbicide For Transition Turfgrasses
EPA Registration No. 2217-602
Your Application Dated February 9, 1996, as Amended March 26, 1996.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you:

1. Revise the first sentence of the Pesticide Disposal instructions to read: "Pesticide wastes are acutely hazardous."

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

The product name as proposed is acceptable. We acknowledge the official name for this product to be "Trimec Herbicide For Transition Turfgrasses". Please use this name in all future correspondence with the Agency regarding this product.

The Confidential Statement of Formula (CSF), referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A copy of the CSF (Basic Formulation)

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #2:S503743.LET

CONCURRENCES

SYMBOL ▶	7505C								
SURNAME ▶	S. Stanton								
DATE ▶	Apr 16, 1996								

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dated February 9, 1996, has been placed in our file for the subject product. Please note; this accepted CSF now supersedes all previous basic CSFs on file for this product.

Sincerely yours,

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

Enclosure

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TRIMEC® HERBICIDE FOR TRANSITION TURFGRASSES

ACTIVE INGREDIENTS:

* Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy) propionic acid	35.13%
** Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	19.97%
*** Dimethylamine salt of Dicamba (3,6-Dichloro-o-anisic acid)	3.74%
INERT INGREDIENTS	<u>41.16%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- * 2.84 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 29.04%
- ** 1.60 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 16.59%
- *** 0.30 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 3.11%

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

KEEP OUT OF REACH OF CHILDREN

CAUTION DANGER

See side panel for Precautionary Statements and the Statement of Practical Treatment.

NET CONTENTS 55 U.S. GALLONS

APXXXXXX
 EPA REG. NO. 2217-602
 EPA EST. NO. 2217-KS-
 Mfd. by PBI/GORDON CORPORATION
 KANSAS CITY, MISSOURI 64101

ACCEPTED
 with **COMMENTS**
 In EPA Letter Dated
APR 16 1996

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

2217-602

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS:

~~CAUTION: Harmful if swallowed. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist.~~ **DANGER, Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Harmful if absorbed through skin. Avoid contact with skin. Harmful if swallowed.** When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant 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

~~IF SWALLOWED: If patient is conscious and alert, give 2-3 glasses of water or milk to drink. If available, give one tablespoon of Syrup of Ipecac to induce vomiting. Alternatively, induce vomiting by touching back of throat with finger. Get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person.~~

~~IF ON SKIN: Wash skin with plenty of soap and water, if available, while removing contaminated clothing. Wash clothing separately before reuse.~~

~~IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for at least 15 minutes. Get medical attention.~~

~~NOTE TO PHYSICIAN: No specific antidote is available. All treatment should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred.~~

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 skin with plenty of soap and water. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Engineering Control Statements:

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

Containers of 5 gallons or more in capacity: Do not open pour product from this container. A mechanical system (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. 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 washwaters. 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.

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

WHERE TO USE:

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

This product 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 and golf courses. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries 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.

HOW MUCH TO USE:

Dosage rates and spray volume recommendations are presented in Table 1.

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.

Table 1. Rate Recommendations for Ornamental Lawns and Turf.				
Species	Amount of Product		Spray Volume	
	Pints/Acre	Fl. oz./1000 sq. ft.	Gallons/Acre	Gallons/1000 sq. ft.
I. Cool Season Turf				
Kentucky Bluegrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Perennial Ryegrass	"	"	"	"
Tall Fescue	"	"	"	"
Bentgrass	1.0 - 1.5	0.37 - 0.55	20 - 175	0.5 - 4.0
Creeping Bentgrass	1.0	0.37	40 - 175	1.0 - 4.0
II. Warm Season Turf				
Common Bermudagrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Hybrid Bermudagrass	"	"	"	"
Bahiagrass	"	"	"	"
Zoysiagrass	"	"	"	"
St. Augustinegrass	1.0 - 1.5	0.37 - 0.55	20 - 175	0.5 - 4.0
Centipedegrass	"	"	"	"

- USE PRECAUTIONS -

- Apply this product to emerged broadleaf weeds that are actively growing. Use higher dosage rates when weeds are dense or in flower. If hardy weeds persist, make a second application after 14 -28 days.
- Avoid applications during long excessively dry or hot periods. Reduce the dosage rates to decrease potential injury when these grasses are under stress.
- Do not broadcast apply when the air temperature exceeds 85°F.
- St. Augustinegrass, bentgrass, and centipedegrass are sensitive to this product and care should be taken to prevent misapplication. Do not spray when these grasses are dormant or emerging from dormancy. Do not apply this product when the ambient temperature is below 50°F or above 90°F or expected to be within 72 hours of application. Cultivars vary in their tolerance to this product. Do not apply this product to 'Floratum' St. Augustinegrass.
- Do not use on lippia or dichondra nor on lawns or turf where desirable clovers are present.
- Do not spray while grass is emerging from dormancy. Do not apply to newly seeded lawns until after the second or third mowing. Seed can be sown 3 to 4 weeks after application.
- Do not irrigate within 24 hours of application.
- Avoid drift or spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants.
- Coarse sprays are less likely to wind-drift. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species.
- After using this product, clean sprayer with Gordon's Spray Tank Cleaner and water, and rinse thoroughly before applying other pesticides. Failure to observe the above precautions may result in injury.
- Do not apply this product through any type of irrigation system.

- WEEDS CONTROLLED -		
Bedstraw	Knotweed	Sheep Sorrel
Black Medic	Lambsquarters	Shepherdspurse
Buckhorn	Lespedeza	Speedwell
Burdock	Mallow	Spurge
Chicory	Momingglory	Wild Carrot
Chickweed	Peppergrass	Wild Garlic
Clover	Pigweed	Wild Onion
Dandelion	Plantains	Yarrow
Dock	Poison Ivy	and
Ground Ivy	Poison Oak	other broadleaf
Heal-All	Purslane	weeds in lawns
Henbit	Ragweed	and turf.

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STORAGE & DISPOSAL

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

STORAGE: Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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 incineration, 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.

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.