

PM 23

2217-602

10/29/98

Page 1 of 6



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

OCT 29 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
Trimec Herbicide For Transition Turfgrasses
EPA Registration Number: 2217-602
Your Submission Dated August 28, 1998

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 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 Statement(s) of Formula submitted 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 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, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (Basic Formulation, dated 08/28/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

McCoke
10-29-98

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

Sincerely yours,

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

) Enclosure

)

396

TRIMEC® HERBICIDE FOR TRANSITION TURFGRASSES

ACTIVE INGREDIENTS:

Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid	35.13%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid ...	17.56%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	19.97%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	3.74%
INERT INGREDIENTS	41.15%
INERT INGREDIENTS	58.73%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 2.84 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 29.04%
- 1.35 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 14.52%
- 4.69 1.54 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 16.59%
- 0.20 0.29 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

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

KEEP OUT OF REACH OF CHILDREN

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-X
MANUFACTURED BY:



ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 29 1998

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

2217-602



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 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 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 washwater. 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,

port 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.
Cool Season Turf				
Kentucky Bluegrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Perennial Ryegrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Tall Fescue	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
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
Warm Season Turf				
Common Bermudagrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Hybrid Bermudagrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Bahiagrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
Zoysiagrass	2.0 - 3.0	0.73 - 1.1	20 - 175	0.5 - 4.0
St. Augustinegrass	1.0 - 1.5	0.37 - 0.55	20 - 175	0.5 - 4.0
Centipedegrass	1.0 - 1.5	0.37 - 0.55	20 - 175	0.5 - 4.0

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 'Floritam' St. Augustinegrass.
- ◆ 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 of 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 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.

676

- WEEDS CONTROLLED -		
Bedstraw	Henbit	Purslane
Black medic	Knotweed	Ragweed
Buckhorn	Lambsquarters	Sheep sorrel
Burdock	Lespedeza	Shepherdspurse
Chicory	Mallow	Speedwell
Chickweed	Morningglory	Spurge
Clover	Peppergrass	Wild carrot
Dandelion	Pigweed	Wild garlic
Dock	Plantain	Wild onion
Ground ivy	Poison ivy	Yarrow and other broadleaf
Healall	Poison oak	weeds in lawns and turf.

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 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 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.