



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 3 2008

James L. Kunstman
PBI/Gordon Corp.
1217 West 12th Street
P.O. Box 014090
Kansas City, MO 64101

Dear Dr. Kunstman:

Subject: RED Label Amendment: 2,4-D, Dicamba and MCPP-p
Trimec Herbicide For Transition Turfgrasses
EPA Registration Number: 2217-602

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the changes below:

1. Per the acute toxicity review, the Spanish signal word "PELIGRO" should be added to the signal word section. Also add the Spanish text to "Stop! Read the entire label first. Observe all precautions and follow the directions carefully."
2. The Agency recommends that additional text be added to the Note to Physician that addresses eye irritation concerns.
3. Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

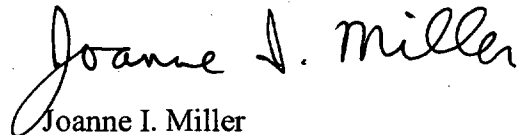
"Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing."
4. Per the acute toxicity review, the text "protective eyewear" appearing in the handler PPE section of the label should be revised to read "goggles or faceshield."
5. The text "This pesticide may be toxic to fish and aquatic invertebrates" appearing in the Environmental Hazard section of the label must be revised to read "This pesticide is toxic to fish and aquatic invertebrates."
6. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

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EPA Reg. Number 2217-602

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. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,



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

Enclosure

rec'd 8/5/08

TRIMEC® HERBICIDE FOR TRANSITION TURFGRASSES

EPA Reg. No. 2217-602

ACTIVE INGREDIENT:

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:	<u>58.73%</u>
TOTAL.....	100.00%

THIS PRODUCT CONTAINS:

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

ACCEPTED
with COMMENTS
In EPA Letter Dated:
NOV 3 2008

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

KEEP OUT OF REACH OF CHILDREN

DANGER

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

2217-602

PRECAUTIONARY STATEMENTS

Hazards to Humans and 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. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment

Some materials that are chemical-resistant to this product are natural rubber. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators and other handlers must wear:

- protective eyewear,
- long-sleeved shirt and long pants,
- shoes and socks, plus
- chemical-resistant gloves (except for applicators using ground boom equipment) and
- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.



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User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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

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.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards

This pesticide may be toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters 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.

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 enter or allow people (or pets) to enter the treated area until sprays have dried.

- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

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.

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 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
Perennial Ryegrass	2.0 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
Tall Fescue	2.0 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
Bentgrass	1.0 to 1.5	0.37 to 0.55	20 to 175	0.5 to 4.0
Creeping Bentgrass	1.0	0.37	40 to 175	1.0 to 4.0
Warm Season Turf				
Common Bermudagrass	2.0 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
Hybrid Bermudagrass	2.0 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
Bahiagrass	2.0 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
Zoysiagrass	2.0 to 3.0	0.73 to 1.1	20 to 175	0.5 to 4.0
St. Augustinegrass	1.0 to 1.5	0.37 to 0.55	20 to 175	0.5 to 4.0
Centipedegrass	1.0 to 1.5	0.37 to 0.55	20 to 175	0.5 to 4.0

Limitations on broadcast treatments for ornamental turfgrass:

The maximum application rate is 3.0 pints of product per acre per application (0.58 lbs 2,4-D ae, 0.51 lb MCPP-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 6.0 pints of product per acre (1.16 lbs 2,4-D ae, 1.01 lb MCPP-p ae, and 0.22 lb dicamba ae per acre).

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 30 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.
- Do not exceed specified dosages for any area.
- After using this product, clean sprayer with 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.
- 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.

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

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

Use only Medium or coarser spray nozzles according to ASAE (S 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: 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

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. _____

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00602.20080807.proposed.doc

2. Reason for Issue: Various changes pertaining to re-registration. Re-format label.