

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 11 1998

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® DMB No. 1-4X Manufacturing Concentrate
EPA Registration Number: 2217-615
Your Submission Dated August 14, 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 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 08/14/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #8:S547714.CNV

CONCURRENCES

SYMBOL ▶	7505C						
SURNAME ▶	S. Stanton						
DATE ▶	Sep 11, 1998						

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 (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

3045

TRIMEC® DMB MIX NO. 1-4X MANUFACTURING CONCENTRATE

For Formulating Use Only

- Not for Resale -

ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid.....	37.60%
2-(2-methyl-4-chlorophenoxy)propionic acid.....	24.00%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	12.00%
Dicamba (3,6-dichloro-o-anisic acid).....	10.00%
INERT INGREDIENTS:	<u>28.40%</u>
INERT INGREDIENTS:	<u>40.40%</u>
TOTAL	100.00%

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

TRIMEC® is a registered trademark of PBI/Gordon Corporation.

KEEP OUT OF REACH OF CHILDREN

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 11 1998

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

2217-615

DANGER

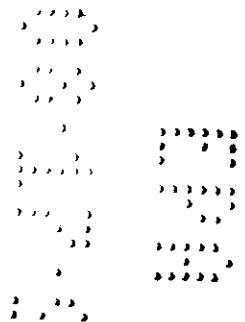
See side panel for additional Precautionary Statements

NET WEIGHT 13 POUNDS

565/ APXXXXXX
EPA REG. NO. 2217-615
EPA EST. NO. 2217-KS-1
MANUFACTURED BY:



EPA Reg. No. 2217-615 Amendment





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

PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

DANGER: Corrosive. Causes eye damage. Do not get in eyes, on skin or clothing. Wear goggles or face shield and rubber gloves when handling. If eye exposure occurs, get immediate medical attention. Harmful if swallowed. Wash thoroughly after handling.

Statement of Practical Treatment

IF IN EYES: In case of contact, immediately flush eyes with plenty of water for 15 minutes. Call a physician at once.

IF ON SKIN: Wash promptly with soap and water. Rinse thoroughly.

IF INHALED: Remove victim to fresh air and apply respiration if indicated.

IF SWALLOWED: Drink 1 or 2 glasses of water. Induce vomiting by touching back of throat with finger. Call a physician at once. Do not induce vomiting or give anything by mouth to an unconscious person.

ENVIRONMENTAL HAZARDS:

Do not discharge effluent containing this product into lakes, streams, ponds, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

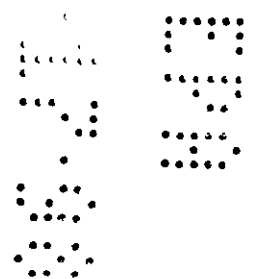
To be formulated into herbicide products for use on residential and turf (excluding sod farms) only.

Instructions must be followed in strict accordance with the manufacturer's recommendations for formulating use.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf uses after June 15, 1994, must contain the revised label language below.

GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING

1. *Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."*
2. *Containers of 5 gallons or more in capacity must also bear the following statement: "A mechanical system (probe and pump) 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."*



SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING

FOR RESIDENTIAL AND TURF USES

- a. **Clothing Requirement Statements:** 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes." 2) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other noncommercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves." 3) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other noncommercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When using 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."
- b. **Personal Hygiene Statements:** 1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water." 2) For All Liquid Products: "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."
- c. The maximum application rate to turf is the lower of: 1) existing application rate on currently registered label or 2) Two 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.
- d. The following reentry statement must be included: "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."

STORAGE & DISPOSAL

STORAGE: Store in original container.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or 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: Completely empty bag into formulation equipment. Then dispose of in a sanitary landfill, or by incineration, or if allowed by State and local authorities by burning. If burned stay out of smoke.

LIMITED WARRANTY.

Manufacturer warrants that the chemical composition conforms to the ingredient statement given on the label and that this product is suited for the labeled use when applied according to label directions. Because of widely varying use conditions, it is impossible to eliminate all risks even when label directions are followed.

EXCLUSION OF OTHER WARRANTIES AND REMEDIES. Except where such disclaimers and exclusions are specifically prohibited by applicable law. THE FOREGOING IS THE ONLY GUARANTEE OR WARRANTY APPLICABLE TO THIS PRODUCT AND IS GIVEN EXPRESSLY AND IN LIEU OF ALL OTHER WARRANTIES EXPRESSED OR IMPLIED, OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND ALL SUCH WARRANTIES WHICH EXCEED OR DIFFER FROM SAID LIMITED WARRANTY ARE DISCLAIMED BY MANUFACTURER, and, upon Manufacturer's compliance with said limited warranty. BUYER SHALL HAVE NO REMEDY AGAINST MANUFACTURER FOR ANY TYPE OF DAMAGE OR LOSS, and, IN NO EVENT SHALL MANUFACTURER BE LIABLE FOR CONSEQUENTIAL DAMAGE OR LOSS.