

PM 23 2217-623

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APR 29 1997

Mr. Craig Martens
 PBI/Gordon Corporation
 1217 West 12th Street
 P.O. Box 14090
 Kansas City, MO 64101

Dear Mr. Martens:

Subject: Label Amendment and Revised Basic CSF: Conversion from
 a Manufacturing Use to an End Use Commercial Turf
 Product; Change in Signal Word and Precautionary
 Text
 Trimec 225 Turf Herbicide
 EPA Registration No. 2217-623
 Your Submission Dated April 1, 1997

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

1. Add a heading to the front paneling to read "For Sale To And Use By Commercial Applicators And Professional Landscapers Only. Not For Sale To Or Use By Homeowners."
2. Add the following Inhalation Statement of Practical Treatment:

"IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

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

The Confidential Statement of Formula (CSF), referred to above, submitted in connection with registration under the

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #5:S521702.LET

CONCURRENCES

SYMBOL >	7505C							
SURNAME >	S. Stanton							
DATE >	Apr 29, 1997							

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A copy of the CSF (Basic Formulation) dated 4/1/97, has been placed in our file for the subject product. This CSF supersedes the previously accepted CSFs for the subject product.

Sincerely yours,

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

Enclosure

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TRIMEC® 225 TURF HERBICIDE

FOR USE IN FORMULATING A TURF HERBICIDE
NOT FOR RESALE
KEEP FROM FREEZING

ACTIVE INGREDIENTS:

*Dimethylamine Salt of 2-(2-methyl-4-chlorophenoxy)propionic acid.....	24.70%
**Dimethylamine Salt of 2,4-dichlorophenoxyacetic acid.....	24.60%
***Dimethylamine Salt of dicamba (3,6-dichloro-o-anisic acid.....	6.18%
-INERT INGREDIENTS.....	44.52%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- *2.0 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 20.40%
 - **2.0 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 20.40%
 - ***0.5 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 5.13%
- Isomer Specific by AOAC Methods.
TRIMEC® is a registered trademark of PBI/Gordon Corporation

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 29 1997

Under the Federal Insecticides,
Fungicides, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-623

KEEP OUT OF REACH OF CHILDREN

CAUTION DANGER

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 SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

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

See side panel for Precautionary Statements

NET CONTENTS 1.0, 2.5, 15, 30, or 55 U.S. GALLONS

821/ APXXXXXX
EPA REG. NO. 2217-623
EPA EST. NO. 2217-KS-1
MANUFACTURED BY:
 **pbi/gordon**
CORPORATION
KANSAS CITY, MO 64101

BEST AVAILABLE COPY

4087



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. In case of contact, wash with soap and water and get medical attention. Avoid inhalation of spray mist.

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, 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.

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

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

Engineering Control Statements:

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

Containers of 5 gallons or more: Do not open pour 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 or dust has settled.
To be formulated into herbicide products for use on residential and turf (excluding sod farms) only.
Formulators using this product are responsible for obtaining EPA registration of their formulated product. Thoroughly clean equipment with a suitable chemical cleaner before using for other purposes.

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~~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, amine 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 rubber 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, amine 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, rubber gloves, and eye protection. It is recommended that safety glasses include front, brow, and temple protection. 4) Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, and chemical resistant gloves. 5) Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, 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 in a locked storage area inaccessible to children or pets. Keep from freezing.~~

~~**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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.~~

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.

EXCLUSIONS 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.

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 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.

SITES

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, maintenance applicators, and service technicians 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 (golf courses), and office buildings. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial 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.

APPLICATION SCHEDULES

Apply this product to emerged broadleaf weeds that are actively growing. Sequential or follow-up applications may be required for dense infestations of perennial and biennial weeds. If required, the treatment interval between the first and second application should be 14 to 28 days.

APPLICATION RATES

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

Generally, the lower application rates within the specified range will provide satisfactory control of sensitive weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds beyond the appropriate growth stages.

The maximum application rate to turf is 0.7 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.

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Table 1. Rate Recommendations for Ornamental Turfgrass.

Species	Amount of Product		Spray Volume	
	Pints/Acre	Fl.oz./1000 sq.ft.	Gallons/Acre	Gallons/1000 sq.ft.
Kentucky Bluegrass	2.0 - 2.75	0.73 - 1.01	20 - 220	0.5 - 5.0
Perennial Ryegrass	2.0 - 2.75	0.73 - 1.01	20 - 220	0.5 - 5.0
Tall Fescue	2.0 - 2.75	0.73 - 1.01	20 - 220	0.5 - 5.0
Fine leaf Fescues Hard Fescues, Sheeps Fescue, Red Fescue (Chewings Fescue, Slender Creeping Fescue, Spreading Fescue)	2.0 - 2.75	0.73 - 1.01	20 - 220	0.5 - 5.0
Creeping Bentgrass	1.0	0.38	20 - 220	0.5 - 5.0

USE PRECAUTIONS:

- ◆ Do not apply this product through any type of irrigation system.
- ◆ Avoid drift of spray mist to vegetables, flowers, ornamentals, shrubs, trees, and other desirable plants. Do not pour spray solutions near these plants. Do not spray roots of ornamentals and trees. Be particularly careful within the dripline of trees and other ornamental species.
- ◆ Do not spray on St. Augustinegrass, centipedegrass, carpetgrass, dichondra, nor on lawns or turf where desirable clovers are present.
- ◆ Do not exceed specified dosages for any area.
- ◆ Do not apply to newly seeded grasses until well established.
- ◆ Do not broadcast apply when air temperatures exceed 85°F, some injury may be expected with spot treatments when air temperatures exceed 85°F.
- ◆ Seed can be sown 3 to 4 weeks after application at recommended rates.

This product controls a wide spectrum of weed species including the following:

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 Lettuce
Ground Ivy	Poison Ivy	Wild Onion
Healall	Poison Oak	Yarrow

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.