

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM 23

2217-623

10/28/98

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OCT 28 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[®] 225 Turf Herbicide
 EPA Registration Number: 2217-623
 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 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.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	DMorgan							

DATE ▶	Oct 28, 1998							
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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

TRIMEC® 225 TURF HERBICIDE

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For Sale To And Use By Commercial Applicators And Professional Landscapers Only. Not For Sale To Or Use By Homeowners.

ACTIVE INGREDIENTS:

Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy)propionic acid	24.70%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	12.35%
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%

INERT INGREDIENTS..... 56.87%

TOTAL 100.00%

THIS PRODUCT CONTAINS:

- 2.0 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 20.40%
- 0.96 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 10.20%
- 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

CONTAINS SINGLE ISOMER FORM OF MECOPROP-p

KEEP OUT OF REACH OF CHILDREN

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

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 65 U.S. GALLONS

821/ APXXXXXX
EPA REG. NO. 2217-623
EPA EST. NO. 2217-KS-1
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. 2217-623



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

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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 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 or dust has settled.

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 -

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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.

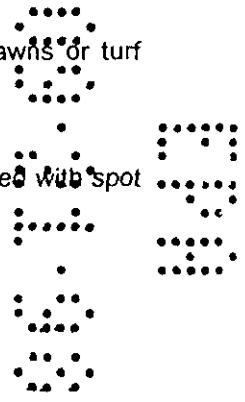
The maximum application rate to turf is 0.7 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

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.

