

PM 23

2217-624

10-5-98

1095

OCT 5 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
 Gordon's Trimec® 450 Herbicide
 EPA Registration Number: 2217-624
 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 our understanding 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 or cover letter dated August 28, 1998. 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.

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CONCURRENCES							
SYMBOL >	7505C						
SURNAME >	S. Stanton						
DATE >	Oct 5, 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

GORDON'S TRIMEC® 450 HERBICIDE

Controls Dandelions, Chickweed, Knotweed, Plantain, Henbit, Spurge
and many other broadleaf weeds.

Contains 2,4-D, MCPP, MCPP-p and Dicamba

-KEEP FROM FREEZING-

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	23.12%
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 dicamba (3,6-dichloro-o-anisic acid)	6.18%
INERT INGREDIENTS:	46.00%
INERT INGREDIENTS	58.35%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

1.88 1.79 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 19.18%
2.00 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 20.40%
0.95 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 10.20%
0.50 0.48 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: In case of contact with eyes, flush with water for 15 minutes. Call a physician at once.

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

See side panels for additional Precautionary Statements.

NET CONTENTS ONE U.S. GALLON

823/ APXXXXXX
EPA REG NO. 2217-624
EPA EST NO. 2217-KS-1
MANUFACTURED BY:

 **pbi/gordon**
corporation
KANSAS CITY, MO 64101

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 5 1998

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

2217-624



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

4/27/83

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

DANGER: Corrosive. Causes eye damage and skin irritation. Do not get in eyes, on skin or clothing. 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. Wear face shield or goggles when mixing, loading or applying this product.

Harmful if swallowed, inhaled or absorbed through skin. Avoid inhalation of spray mist.

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: 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.

In case of contact, immediately flush eyes or skin with plenty of water. If in eyes, see a physician. If irritation develops, get medical attention. Wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. For terrestrial uses, 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 of equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply when weather conditions favor drift from target area.

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

For use on residential and other turf sites excluding sod farms.

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

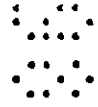
Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has settled.

STORAGE & DISPOSAL

STORAGE: KEEP FROM FREEZING. Store in original container in a locked storage area away from children and pets.

PRODUCT 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 incineration or if allowed by state and local authorities by burning. If burned stay out of smoke.



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USE PRECAUTIONS:

Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solution near these plants. Do not spray on carpetgrass, dichondra or lawns or turf where desirable clovers are present. Use only lawn-type sprayers. Note: Coarse sprays are less likely to wind drift. Do not apply to areas underlaid by roots of desirable trees and shrubs. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 85°F. Seed can be sown 3 to 4 weeks after application. Do not spray while grass is emerging from dormancy. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species.

Do not contaminate domestic or irrigation waters. Some injury can be expected to turf when used on centipedegrass or St. Augustinegrass lawns; spot spray weeds only on these types of grasses. Clover present will be damaged if sprayed. After using this product, clean sprayer with soap or detergent and water, and rinse thoroughly before applying other pesticides. Failure to observe the above precautions may result in injury to desirable plants. Do not apply this product through any type of irrigation system.

ORNAMENTAL LAWNS AND TURF:

Apply at the rate of 2 to 3 pints per acre in sufficient water for adequate coverage. Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid applying during long excessively dry or hot periods unless adequate irrigation is available. Do not apply to newly seeded turf until after the second or third mowing. Grass seed can be sown 3 to 4 weeks after application at recommended rate. Do not use on dichondra.

The maximum application rate to turf is 0.8 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.

WEEDS CONTROLLED:

Gordon's Trimec® 450 Herbicide is especially effective against weeds such as sheep sorrel, knotweed, spotted spurge, chickweed, oxalis, and henbit.

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.

