James A. Armbruster, Ph.D. PBI/Gordon Corporation 1217 W. 12th Street P.O. Box 4090 Kansas City, MO 64101

DFC 0.8 1994

Dear Dr. Armbruster:

Subject: Revised Labeling - Product Name Change and Addition of

Use On Sod Farms

Gordon's Sod Farm Trimec

EPA Registration No. 2217-625

Your Submissions Dated June 24 and November 9, 1994

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

- 1) The product name as proposed is acceptable. We acknowledge the official product name for this product to be "Gordon's Sod Farm Trimec". Please use this name in all future correspondences with the Agency regarding this product.
- 2) Delete the statement "Induce vomiting by touching back of throat with finger" from the "IF SWALLOWED" statement.
- 3) Add the statement "Get medical attention" to the end of the "IF INHALED" statement.
- 4) Since this product has no aquatic uses, the phrase "For terrestrial uses..." may be deleted from the third sentence of the Environmental Hazards section.
- 5) Delete the words "...if allowed..." from the Container Disposal statement for metal containers.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

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

Enclosure

DK: 305-7546:FH	B/PM23	CONCURRENCES			
SYMBOL 7505C					
SURNAME D. KENNY					
DATE 11/8/94					
EPA Form 1320-1A (1/90)		Printed on Recycled Pa	iper	OFF	ICIAL FILE COPY

Official Name:

GORDON'S TRIMEC® VINEX
MANUFACTURING CONCENTRATE

Proposed Official Name: GORDON'S SOD FARM TRIMEC®

ACTIVE INGREDIENTS:

* Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	27.59%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy) propionic acid	13.86%
*** Dimethylamine salt of Dicamba (3,6-dichloro-o-anisic acid)	2.76%
INERT INGREDIENTS	<u>55.79%</u>
TOTAL.	100 00%

THIS PRODUCT CONTAINS:

- 2.20 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 22.92%
- 1.10 lbs. 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 11.45%
- ¹¹ 0.22 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 2.29% Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

DANGER

See side panel for Precautionary Statements and Statement of Practical Treatement.

NET CONTENTS 1, 2.5, 15, 30, and 55 GALLONS

936/ AP EPA REG. NO. 2217-625 EPA EST. NO. 2217-KS-1

Mfd. by PBI/GORDON CORPORATION KANSAS CITY, MISSOURI 64101 ACCEPTED
with COMMENTS
In EPA Letter Dated

Under the Federal Insecticide. Fundicide, and Rodenticide Act as amended, for the penticide registered under EPA Reg. No. 2217-625

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IF INHALED: Remove victim to fresi, air. If not breathing give artificial respiration, preferably mouth to mouth.

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

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 washwaters.

When cleaning or equipment, do not pour the washwater on the ground: spray or drain over a large area away from well; 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 irnovirvious 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 inconsistant with its labeling.

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

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR part 170.

This standard contains requi ements for the protection of agricultural workers on farms, forests, nurseries, and preenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear: coveralls, waterproof gloves, protective eyewear, and shoes plus socks.

- SITES AND TURFGRASS -

Gordon's Sod Farm Trimec* is intended for use on sod farms. Gordon's Sod Farm Trimec* provides selective broadleaf control in warm season and cool season turfgrass established for commercial sod production.

Newly seeded and established turf of Kentucky bluegrass, perennial ryegrass, tall fescue, fine leaf fescues, creeping bentgrass, common bermudagrass and bahiagrass may be treated. Also, Gordon's Sod Farm Trimec* may be used on newly sodded, sprigged, or plugged turf of corhhibit bermudagrass, hybrid bermudagrass and zoysiagrass. See Application Schedules.

- APPLICATION SCHEDULES -

Apply Gordon's Sod Farm Trimer. 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 21 to 28 days.

NEWLY SEEDED AREAS:

The application of Gordon's Sod Farm Trimec[®] to grass seedlings is recommended after the onset of tillering and after the grass seedlings have developed an adequate secondary root system. Usually, five to six leaves of the grass seedlings are visible when the first tiller appears.

NEWLY SODDED, SPRIGGED, OR PLUGGED AREAS:

The application of Gordon's Sod Farm Trimec[®] to newly sodded, sprigged, or plugged grasses should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations.

ESTABLISHED GRASS STANDS:

Spring and fall applications of Gordon's Sod Farm Trimec® are recommended for grasses that have been planted for one or more seasons. Also, applications to dormant bermudagrass, dormant zoysiagrass, and dormant bahiagrass are suggested.

- APPLICATION RATES -

Dosage rates and spray volume recommendations of Gordon's Sod Farm Trimec^e use in commercial sod production 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 1.1 pounds 2,4-D acid equivalent per acre per application site. The maximum number of broadcast applications per treatment site is 2 per year.

Table 1. Rate Recommendations for Sud Farms.					
	Amount of Product		Spray Volume		
Species	Pints/Acre	Fl.oz./1000 sq.ft.	Gallons/Acre	Gallons/1000 sq.ft.	
I. Cool Season Turf					
Kentucky Bluegrass	2.2 to 4.0	0.8 to 1.5	20 to 175	0.5 to 4.0	
Perennial Ryegrass					
Tall Fescue				١	
Fine leaf Fescues Hard Fescues Sheeps Fescue Red Fescue (Chewings Fescue, Slender Creeping Fescue, Spreading Fescue)	·				
Creeping Bentgrass	2.3	0.8	40 to 175	1.0 to 4.0	
II. Warm Season Turf					
Cornmon Bermud agrass	2.2 to 3.0	0.8 to 1.1	20 to 175	0.5 to 4.0;	
Hybrid Bermudagrass			• •		
Bahiagrass			:	* :	
Zoysiagrass			• •	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	

- USE PRECAUTIONS AND LIMITATIONS FOR SOD FARMS -

- 1. Do not apply this product through any type of irrigation system.
- 2. Avoid drift or spray mist onto vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour spray solutions near these plants.
- 3. Delay mowing 1 to 2 days before and after the application of this product.
- 4. Do not apply this product immediately before rainfall or imigation. Do not irrigate or water the turfgrass within 24 hours after application.
- 5. Do not use an adjuvant (e.g. spreader, spreader-sticker, surfactant, crop oil) with this product.
- 6. Treated areas may be reseeded 3 to 4 weeks after application.

- WEED SPECTRUM -

Gordon's Sod Farm Trimec® controls a wide variety of problem weed species including the following:

WEEDS					
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	Plantains	Wild Lettuce			
Ground Ivy	Poison Ivy	Wild Onion _			
Healall	Poison Oak	Yarrow			

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Reentry Statement:

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

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Gordon's Sod Farm Trimec[®] is intended to be applied by lawn care operators and landscape personnel for use in turf established in nonagricultural and institutional sites.

- Uncultivated, nonagricultural areas including airports, roadsides, highway rights-of-way, utility rights-of-way, campgrounds and industrial sites.
- Institutional sites defined as areas around properties or facilities providing a service to public or private organizations including, but not limited to, hospitals, nursing homes, schools, universities, museums, cemeteries, libraries, sport facilities, and office buildings.

- APPLICATION RATES -

Dosage rates and spray volume recommendations of Gordon's Sod Farm Trimec® for use in nonagricultural sites are presented in Table 2.

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

Table 2. Rate Recommendations for Nonagricultural Sites					
	Amount of Product		Spray Volume		
Species	Pints/Acre	Fl.oz./1000 sq.ft.	Gallons/Acre	Gallons/1000 sq.ft.	
I.Cool Season Turf					
Kentucky Bluegrass	3.0 to 4.0	1.1 to 1.5	20 to 175	0.5 to 4.0	
Perennial Ryegrass					
Tall Fescue	,				
Fine leaf Fescues Hard Fescues Sheeps Fescue Red Fescue (Chewings Fescue, Slender Creeping Fescue, Spreading Fescue)				i	
II.Warm Season Turf					
Common Bermudagrass	3.0 to 3.5	1.1 to 1.3	20 to 175	0.5 to 4.0	
Hybrid Berinudagrass					
Bahiagrass					
Zoysiagrass					



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- USE PRECAUTIONS AND LIMITATIONS NONAGRICULTURAL SITES -

- 2. Do not apply this product through any type of irrigation system.
- 2. Avoid drift or spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants.
- 3. Do not apply to newly seeded turf until after the second or third mowing.
- 4. Delay mowing 1 to 2 days before and after the application of this product.
- 5. Do not apply this product immediately before rainfall or irrigation. Do not irrigate or water the turfgrass within 24 hours after application.
- 6. Treated areas may be reseeded 3 to 4 weeks after application.
- 7. Warm season grasses are particularly sensitive to this product when emerging from or entering dormancy. Be particularly careful during these periods.

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.

PRODUCT 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: <u>FOR METAL CONTAINERS</u> - 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 other procedures approved by state and local authorities. <u>FOR PLASTIC CONTAINERS</u>— 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.

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, tomadoes, 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.