

2217-639

9/6/2001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SEP - 6 2001

Mr. Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, Missouri 64101

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
Trimec 875 Herbicide
EPA Registration No. 2217-639
Your Submission Dated May 23, 2001

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 forms [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 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 basic Confidential Statement 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 that previously approved labeling for 18 months from the date of this letter.

A stamped copy of the labeling is enclosed for your records. This labeling supersedes all previously accepted labels. 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

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	Miller							
DATE	9/6/01							

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TRIMEC® 875 HERBICIDE

A BRUSH AND BROADLEAF WEED KILLER

Controls Ash, Birch, Brambles, Kudzu, Multiflora Rose, Willow,
Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge
and other species of brush and broadleaf weeds

ACTIVE INGREDIENTS:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	12.55%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	23.45%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	4.24%
INERT INGREDIENTS.....	59.76%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

0.96 lb. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 10.37%
 1.81 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 19.49%
 0.32 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 3.52%
 Isomer Specific by AOAC Methods.
 Contains single isomer form of Mecoprop-p.
 TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panels for additional Precautionary Statements
and Statement of Practical Treatment.

- KEEP FROM FREEZING -

NET CONTENTS: ONE QUART

870/
 EPA REG. NO. 2217-639 Amend
 EPA EST. NO. 2217-KS-1
 MANUFACTURED BY:



ACCEPTED
 with COMMENTS
 In EPA Letter Dated
SEP - 6 2001

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-639



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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes eye damage and skin irritation. Do not get in eyes, on skin or on clothing. Harmful if swallowed or inhaled. Avoid exposure to spray mist.

FOR TURF SITES ONLY:

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.

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.

FOR INDUSTRIAL SITES ONLY:

Clothing Requirements: 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. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.

Hygiene Requirements: Wash hands, face, and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face, and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous days mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

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 product from this container.** A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a nonrefillable pesticide container are emptied, the probe must be rinsed before removal.

Statement of Practical Treatment

IF IN EYES: In case of eye 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 irritation develops, get medical attention.

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.

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

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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 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 contaminate domestic or irrigation waters. 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

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

Do not reenter or permit workers to reenter treated area until sprays have dried or dusts have settled.

STORAGE & DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and domestic animals.

PESTICIDE 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.

USE PRECAUTIONS.

BRUSH & BROADLEAF WEEDS ALONG ROADSIDES, DRAINAGE DITCHBANKS, FENCEROWS, RIGHT-OF-WAYS, FARM BUILDINGS AND OTHER SIMILAR NONCROP AREAS:

Do not apply this product through any type of irrigation system. Avoid spray drift to cotton, soybeans, tomatoes, tobacco, grapes, fruit trees, flowers or garden crops and all other hormone herbicide-sensitive desirable plants. Do not apply near sensitive plants since small quantities of wind drifted herbicides may cause severe injury. Do not apply in areas underlaid by roots of desirable trees and shrubs. Do not apply herbicide when wind speed is sufficient to cause drift. Do not apply herbicide when an air temperature inversion exists. An air inversion may be detected by creating a smoke column and observing a layering effect. Do not apply when temperature exceeds 85° and humidity is high.

To aid in avoiding spray drift, use coarse sprays and low pressure. Do not use nozzles which produce fine spray droplets under high pressure. The use of thickening agents or antidrift additives and drift reducing equipment may aid in preventing spray drift. Care should be taken not to make applications where runoff could carry the chemical to food crops or grazing lands where cattle, sheep, goats, swine or poultry would be exposed.

ROADSIDES, DRAINAGE DITCH BANKS, FENCEROWS, RIGHT-OF-WAYS, FARM BUILDINGS AND OTHER SIMILAR NONCROP AREAS:

To effectively control brush, all leaves, stems, and suckers should be thoroughly wet to the ground. Apply when plants come into full leaf (spring) to the time plants begin to go dormant. Best results are obtained when brush and weeds are young and actively growing. Do not cut brush or weeds until the herbicide has translocated throughout the plant causing root death.

HIGH VOLUME:

Mix 1/2 to 1 gallon of product per 100 gallons of water and apply 100 to 300 gallons of spray per acre. Dosage rates per acre depend on the density of brush and/or weeds. For small broadleaf weeds use the lower rate. Heavy dense stands of brush require the high rate with high water volume.

For small applications with small tank sprayers mix 1 to 1 1/2 fluid ounces of product per gallon of water.

LOW VOLUME GROUND OR FOLIAR SPRAY:

Mix 1/2 to 2 gallons of product in water with spray volumes of 15 to 25 gallons per acre. Use enough water to ensure uniform wetting of plants.

BRUSH CONTROLLED:		
Ash	Cottonwood	Multiflora rose
Aspen	Dogwood	Oak
Birch	Elm	Poplar
Blackberry	Gooseberry	Pine
Black cherry	Honey locust	Spruce
Black locust	Honeysuckle	Sycamore
Brambles	Kudzu	Wild plum
Buckbrush	Maple	Willow
Cedar		

FOR USE ON RESIDENTIAL AND OTHER TURF SITES EXCLUDING SOD FARMS:

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.

USE PRECAUTIONS.

BROADLEAF WEEDS IN ORNAMENTAL LAWNS AND TURF:

Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour spray solution near desirable plants. Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present. Use only lawn-type sprayers. Avoid fine sprays; coarse sprays are less likely to wind drift. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 85°. Seed can be sown 3 to 5 weeks after herbicide application.

BROADLEAF WEEDS/ORNAMENTAL LAWNS AND TURF (COOL SEASON GRASSES OTHER THAN BENTGRASS):

One Gallon Covers up to 4 Acres -- Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid spraying during long excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

APPLICATION RATES:

Apply 2 1/2 to 3 1/2 pints of product in 20 to 260 gallons of water per acre (1 to 1 1/4 fluid ounces in 0.5 to 6 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

The maximum application rate to turf is 0.9 pounds 2,4D acid equivalent per acre per application per site.

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The maximum number of broadcast applications per treatment site is 2 per year.

WEEDS CONTROLLED:		
Bedstraw	Kochia	Ragweed
Bindweed	Knotweed	Sheep sorrel
Black medic	Lambsquarters	Shepherdspurse
Buckhorn	Lespedeza	Smartweed
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Mustard	Sunflower
Clover	Nettle	Thistles
Cocklebur	Peppergrass	Velvetleaf
Dandelion	Pigweed	Wild carrot
Dock	Plantains	Wild garlic
Ground ivy	Poison ivy	Wild lettuce
Healall	Poison oak	Wild onion
Henbit	Purslane	Yarrow
Jimsonweed		

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.