



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 29 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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Subject: Label Amendment for RED: 2,4-D
Trimec 875 Herbicide
EPA Reg. No. 2217-639

The label amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the following changes to the product labeling:

1. Per the acute toxicity review, the statement "Do not get in eyes or on clothing" in the Hazards to Humans and Domestic Animals section must be revised to read "Do not get in eyes, on skin or on clothing." Also, delete the statement "Avoid contact with skin."
2. The PPE section must be revised to include the text "PPE" immediately following the section heading. Also, due to the acute toxicity review, delete the text "(except for applicators using ground boom equipment)."
3. Per the product chemistry review, the first sentence under the pesticide disposal subheading must be revised to read "Pesticide wastes are acutely hazardous."
4. The following text must be added to the label:

"Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes."
5. Under the **Broadcast Applications to Woody Plants** section, add the statement "Limited to one application per year."

Under **Limitations on Spot Treatment for Ornamental Turfgrass**, add the statement "Do not make a repeat application within 30 days of the previous application."

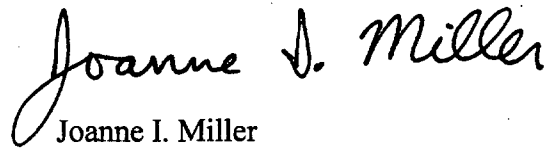
- 6. Add the following statement to the labeling:

Use of this product in certain portions of California, Oregon and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition, et al. v. EPA, C01-0132C, (W.D. WA). For further information, please refer to EPA Web Site: <http://www.epa.gov/espp>.

- 6. While the Container Disposal language in the Storage and Disposal section of the label submitted for review fulfills current requirements, you should consider updating the labeling to meet the requirements of Pesticide Registration (PR) Notice (PR) 2007-4: Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment" For further information, please refer to EPA Web Site. http://www.epa.gov/PR_Notices/pr2007-4.pdf
- 7. Note: Child resistant packaging is required for this product.
- 8. Note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Michael Walsh by phone at (703) 308-2972 or via email at walsh.michael@epa.gov.

Sincerely,



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

Enclosure

see a 8-3-08 3/9

TRIMEC® 875 HERBICIDE

EPA Reg. No. 2217-639

ACTIVE INGREDIENT:

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.

**ACCEPTED
with COMMENTS**
In EPA Letter Dated:
SEP 29 2008

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

KEEP OUT OF REACH OF CHILDREN

DANGER

KEEP FROM FREEZING

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

2217-639

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Harmful if absorbed through skin. Avoid contact with skin. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment

Some materials that are chemical-resistant to this product are natural rubber. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators and other handlers must wear:

- protective eyewear,
- long-sleeved shirt and long pants,
- shoes and socks, plus
- chemical-resistant gloves (except for applicators using ground boom equipment) and
- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.



User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

User Safety Recommendations	
<ul style="list-style-type: none"> • Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. • Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water. • Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. 	

First Aid	
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or on clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

Environmental Hazards

This pesticide may be toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

DIRECTIONS FOR USE

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

General Precautions and Restrictions:

- Do not enter or allow people (or pets) to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

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

BRUSH & BROADLEAF WEEDS USE PRECAUTIONS

Do not apply this product through any type of irrigation system. Do not apply when temperature exceeds 85° and humidity is high.

DIRECTIONS, RESTRICTIONS AND LIMITATIONS FOR USE IN NON-CROPLAND

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Broadcast applications to annual and perennial weeds: Apply to emerged weeds. For best results, treat when weeds are young and actively growing.

The maximum application rate to general noncropland sites is 1.1 gallon of product per acre per application per site.

When multiple applications of up to 2.0 lbs. 2,4-D acid equivalent per acre are utilized to reach the maximum seasonal use rate, do not make a repeat application within 30 days of the previous application.

Minimum spray volume: Use 2 or more gallons of spray solution per acre.

Number of applications: Limited to 2 applications per year.

Broadcast applications to woody plants: Apply to trees and brush when foliage is fully expanded and plants are actively growing.

Up to 2.2 gallons of product per acre (4.0 lbs. 2,4-D acid equivalent per acre) may be applied in a single application to rights-of-way, including electrical power lines, communication lines, pipelines, highways and railroads that intersect wooded areas or stands of trees, brush and woody plants.

The maximum noncropland application rate for tree, brush and woody plant control is 2.2 gallons of product per acre per application per site.

Target species	Application schedule	Maximum application rate, Gallons of product per acre	Maximum application rate, Pounds of 2,4-D acid equivalent per acre per application	Maximum number of applications per year	Minimum days between applications	Minimum spray volume, gallons per acre
Annual and perennial weeds	Broadcast	1.1 gal/A	2.0 #/A	2	30 days	2
Woody plants	Broadcast and high volume foliar	2.2 gal/A	4.0 #/A	1	NA	See Tables 1-2.

High volume foliar applications (100-400 gallons per acre):

Apply 0.55 to 2.2 gallons of product per acre with adequate water or apply a 0.55 to 2.2% vol/vol spray solution as a full cover spray with high volume equipment. Use the lower spray concentrations in the range for susceptible species and use the higher spray concentrations within the range for hard-to-control species, for mature plants during the late summer or under adverse environmental conditions (e.g. drought).

Spray broadleaf weeds, woody plants or mixed brush uniformly and thoroughly by wetting all leaves, stems, bark and root collars. The total volume of spray solution required for adequate coverage of solid stands of mixed brush can range from 100 to 400 gallons of spray solution per treated acre. The spray preparation chart for applications on a spray-to-wet basis is shown below in Table 1.

Table 1. Instructions for preparing 100 to 400 gallons of spray solution at 0.55 to 2.2% spray concentration with water for high volume foliar applications.

Spray solution per acre, Gallons	Amount of Product Needed for Spray Concentration of:			
	0.55%	0.74%	1.1 %	2.2%
100	0.55 gal.	0.73 gal.	1.1 gal.	2.2 gal.
200	1.10 gal.	1.48 gal.	2.2 gal.	----
300	1.66 gal.	2.2 gal.	----	----
400	2.2 gal.	----	----	----

Equal measures: 1 gallon = 4 quarts = 8 pints = 128 fl.oz.

The maximum seasonal application rate for trees, brush and woody plant control is 2.2 gallons of product per acre per application per site.

For Backpack Sprayers, Knapsack Sprayers, And Hand-pressurized Pump Sprayers

Table 2. Instructions for preparing 1 to 3 gallons of spray solution at 0.55 to 2.2% spray concentration with water for high volume foliar applications.

Gallons Of Water	Amount Of Product Needed for Spray Concentration of :			
	0.55%	0.74%	1.1%	2.2%
1	4 teaspoons	2 tablespoons	3 tablespoons	6 tablespoons
2	3 tablespoons	4 tablespoons	6 tablespoons	12 tablespoons
3	4 tablespoons	6 tablespoons	4 fl.oz.	8 fl.oz.

Equal measures: 1 fl.oz. = 2 Tablespoons (Tbs.) = 6 Teaspoons (tsp.)

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

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

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

USE PRECAUTIONS.

Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present. Use only lawn-type sprayers. Do not exceed specified dosages for any area. 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.

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.

Do not use this product on or near desirable plants, including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs, since injury may result.

APPLICATION RATES:

Apply 2.5 to 3.5 pints of product in 20 to 260 gallons of water per acre (1 to 1.25 fluid ounces in 0.5 to 6 gallons of water per 1,000 square feet). Use higher rates within the specified range when using the higher volume of water per acre.

Limitations of broadcast treatments for ornamental turfgrass:

The maximum application rate is 3.5 pints of product per acre per application (0.79 lbs 2,4-D ae, 0.42 lb MCP-p ae, and 0.14 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 7.0 pints of product per acre (1.58 lbs 2,4-D ae, 0.84 lb MCP-p ae, and 0.28 lb dicamba ae per acre).

Limitations on spot treatments for ornamental turfgrass:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 1.25 fl.oz. per 1,000 sq.ft. per application (0.41 lbs MCP-p acid equivalent per acre).

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

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

Use only Medium or coarser spray nozzles according to ASAE (S 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

STORAGE AND DISPOSAL

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

PESTICIDE 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.

a/a

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.
- 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

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00639.20080807.proposed.doc

2. Reason for Issue: Various changes pertaining to re-registration. Re-format label.