



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D C 20460

SEP 16 1994

James A. Armbruster, Ph.D.  
Chemical Consultants International  
Agent for: PBI/GORDON CORPORATION  
7270 W. 98th Terrace, Suite 100  
Overland Park, KS 66212

OFFICE OF  
PREVENTION PESTICIDES AND  
TOXIC SUBSTANCES

SUBJECT: Label Amendment Submission of 09/22/93 in Response to PR Notice 93-7  
EPA Reg. No. 2217-648  
GORDON'S BRUSHKILLER 801

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE PRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1) of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stamped accepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.

Sincerely,

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James Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)



Recycled/Recycled  
Printed with Soy Ink  
contains at least 50% recycled paper

# GORDON'S BRUSH KILLER 801

A TRIMEC® BRUSH HERBICIDE FORMULATION

Controls Ash, Aspen, Brambles, Kudzu, Oak,  
Willows and other species of brush and weeds.

## ACTIVE INGREDIENTS:

* Isooctyl (2-ethylhexyl) ester of 2,4-dichlorophenoxyacetic acid.....	17.07%
** Butoxyethanol ester of 2-(2,4-dichlorophenoxy) propionic acid .....	16.11%
*** Dicamba (3,6-dichloro-o-anisic acid) .....	11.32%
INERT INGREDIENTS.....	<u>55.50%</u>
TOTAL	100.00%

## THIS PRODUCT CONTAINS:

- \* 1.0 lb. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 11.32%
- \*\* 1.0 lb. 2-(2,4-dichlorophenoxy) propionic acid equivalent per gallon or 11.30%
- \*\*\* 1.0 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 11.32%

Isomer Specific by AOAC Methods

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

## KEEP OUT OF REACH OF CHILDREN

## WARNING

### STATEMENT OF PRACTICAL TREATMENT

In case of contact with eyes, flush with water for 15 minutes. Get medical attention. In case of contact with skin, wash with plenty of soap and water.

See side panels for additional Precautionary Statements.

### NET CONTENTS ONE GALLON

801/993 AP  
EPA REG. NO. 2217-648  
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,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

2217-648

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

### **PRECAUTIONARY STATEMENTS**

#### **Hazards to Humans and Domestic Animals**

**WARNING:** Do not get in eyes, on skin or clothing. If spills occur, collect the material and dispose of by following disposal instructions on this label. If eye exposure occurs, get immediate medical attention. Harmful if swallowed. Avoid breathing vapor. Wash contaminated clothing before reuse.

When mixing, loading, or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. 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.

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 day's 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: 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.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish and aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. For terrestrial uses, do not apply directly to water, 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 apply when weather conditions favor drift from target area.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and 2,4-DP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and 2,4-DP 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.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not use or store near heat or open flame.

### **DIRECTIONS FOR USE**

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

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## STORAGE & DISPOSAL

**STORAGE:** Store in original container in a locked storage area.

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

## - USE PRECAUTIONS -

Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Clover present will be damaged if sprayed. Coarse sprays are less likely to drift away from target area. Do not apply when weather conditions favor drift away from target area. Do not apply this product through any type of irrigation equipment.

**NOTE:** 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 herbicide when wind speed is sufficient to cause drift. Do not apply herbicide when a temperature air inversion exists. An air inversion may be detected by creating a smoke column and observing a layering effect. Do not apply when temperature exceeds 90°F 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 is of value in preventing spray drift. Care should be taken not to make applications where runoff could contaminate bodies of water or spray drift could carry the chemical to food crops or grazing lands where cattle, sheep, goats, swine or poultry would be exposed.

**ROADSIDE, DRAINAGE DITCHBANKS, RIGHT-OF-WAYS, RAILROADS, FIREBREAKS, FORESTS, FENCEROWS, INDUSTRIAL SITES AND OTHER SIMILAR NON-CROP AREAS:** To effectively control brush, all leaves, stems and suckers should be thoroughly wet to the ground. Apply Gordon's Brush Killer 801 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.

**HIGH VOLUME.** Use Gordon's Brush Killer 801 at the rate of 1/2 to 2 gallons in water to make 100 to 300 gallons of spray per acre. The amount of water used must allow for full wetting of plants. For small broadleaf weeds, use the lower rate. Heavy dense stands of brush require the high rate with high water volume.

**GROUND or AERIAL FOLIAGE SPRAY:** Use Gordon's Brush Killer 801 at the rate of 1/2 to 2 gallons in water to make 15 to 25 gallons of spray per acre. Use enough water to ensure uniform wetting of plants.

**BASAL BARK METHOD:** Thoroughly wet the base and root collar of all stems until the spray collects around the root collar at ground line. Mix 1 to 2 gallons of Gordon's Brush Killer 801 in 20 gallons of water. Apply with low volume knapsack sprayer or power equipment. Concentration will depend on volume of spray used, species present and season applied. Use a coarse spray to avoid drift.

For winter dormancy spraying, mix 1 to 2 gallons Gordon's Brush Killer 801 in 20 gallons of oil.

**MODIFIED BASAL METHOD:** Drench the base of plants, then wet the lower 4/5 of remaining stems and leaves to runoff. Treat when brush is in full foliage. This method may be used where susceptible species have been controlled by prior sprays and resistant species such as maple and gum remain. Drenching the base of the plant and wetting all stems to runoff is essential for complete control.

**CLT SURFACE - STUMP:** This method can be used at any time of year, but is more effective when applied as soon as possible after trees are cut. Spray the entire stump, particularly bark and exposed roots. Complete control requires a thorough drenching. Use this method after original or capital clearing. It is the primary step toward a chemical brush control program on newly cleared highways and rights-of-ways. Spray is most effective and economical on stumps 3 to 4 inches or larger. Mix 1 to 2 gallons of Gordon's Brush Killer 801 in 20 gallons of water. Apply with low volume knapsack sprayer using solid cone nozzle of medium orifice.

**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.

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