

JUN 9 1995

Mr. James A. Armbruster, Ph.D.  
PBI/Gordon Corporation  
1217 West 12th Street  
P.O. Box 4090  
Kansas City, Missouri 64101-1407

Dear Dr. Armbruster:

SUBJECT: Label Amendments:

Trimec 937 Herbicide	(EPA Reg. No. 2217-758)
Gordon's Brush Killer 801	(EPA Reg. No. 2217-648)
Trimec 800 Herbicide	(EPA Reg. No. 2217-651)
EH 1068 Trimec Ester	(EPA Reg. No. 2217-774)

Your Applications Dated May 8, 1995, Requesting to Revise the Oral Statements of Practical Treatment.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided changes are made to the subject product labels, as specified below:

I. Trimec 937 Herbicide (2217-758):

1. The statement, "Contains Petroleum Distillates", must be added as a footnote to the Ingredient Statement.
2. The Clothing Requirements and Personal Hygiene statements for "Ornamental Lawns & Turf" are correct, but should be moved from the Directions for Use section to the Precautionary Statements section of the label and placed under a heading indicating that these statements apply to turf sites only.
3. The Clothing Requirements and Personal Hygiene statements that are currently located in the Precautionary Statements section (paragraphs 2 & 3) should be placed under a heading indicating that these statements apply to industrial sites only and should be revised as follows:

RD:STANTON:PM Team 23:Rm. 235:305-5218:Disk #1:S487521.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jun 9, 1995							

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-The phrase "or repairing or cleaning equipment used with this product" must be added after "When mixing, loading, or applying this product" in the first sentence of the Clothing Requirement Statements.

-The Personal Hygiene Statements should be revised to read:

"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."

4. The first paragraph of the Hazards to Humans & Domestic Animals section should be revised by moving the sentence that begins "If spills occur ..." to the Environmental Hazards section of the label and correcting the second-to-last sentence to read: "Harmful if swallowed, inhaled or absorbed through skin."

5. The Statement of Practical Treatment section should be revised as follows:

-The sentence "Get medical attention." should be added to the dermal exposure statement.

-The following inhalation exposure statement must be added:

"If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

II. Gordon's Brushkiller 901 (2217-648):

1. The statement, "Contains Petroleum Distillates", must be added as a footnote to the Ingredient Statement.

2. The first paragraph of the Hazards to Humans & Domestic Animals section should be revised as follows:

-The sentence that begins "If spills occur ..." should be moved to the Environmental Hazards section of the label.

-The remainder of the paragraph must be revised to read:

"WARNING: Causes substantial but temporary eye injury. Harmful if swallowed, inhaled or absorbed through skin. Do

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not get in eyes, on skin, or on clothing. Avoid breathing vapor."

3. The Statement of Practical Treatment section should be revised as follows:

-The sentence "Get medical attention." should be added to the dermal exposure statement.

-The following inhalation exposure statement must be added:

"If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

### III. Trimec 800 Herbicide (2217-651):

1. The statement, "Contains Petroleum Distillates", must be added as a footnote to the Ingredient Statement.
2. The Clothing Requirements and Personal Hygiene statements for "Industrial Sites" are correct, but should be moved from the Directions for Use section to the Precautionary Statements section of the label and placed under a heading indicating that these statements apply to Industrial sites only.
3. The Clothing Requirements and Personal Hygiene statements that are currently located in the Precautionary Statements section (paragraph 2) should be placed under a heading indicating that these statements apply to Turf sites only.
4. The last sentence of the Hazards to Humans & Domestic Animals section, that begins "If spills occur ...", should be moved to the Environmental Hazards section of the label.
5. The first paragraph of the Hazards to Humans & Domestic Animals section should be revised to read as follows:  

"CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye injury. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor."
6. The Statement of Practical Treatment section should be revised as follows:  

-The ocular statement should read: "If In Eyes: Flush eyes with plenty of water. Call a physician if irritation persists."  
  
-The sentence "Get medical attention." should be added to the dermal exposure statement.

-The following inhalation exposure statement must be added:

"If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

IV. EH 1068 Trimec Ester (2217-774):

- 1. The Clothing Requirements and Personal Hygiene statements for "Ornamental Lawns & Turf" are correct under both Option I and Option II, but should be moved from the Directions for Use section to the Precautionary Statements section of the label and placed under a heading indicating that these statements apply to turf sites only.
- 2. The Clothing Requirements and Personal Hygiene statements that are currently located in the Precautionary Statements section (paragraphs 2 & 3) should be placed under a heading indicating that these statements apply to industrial sites only and should be revised as follows:

-The phrase "or repairing or cleaning equipment used with this product" must be added after "When mixing, loading, or applying this product" in the first sentence of the Clothing Requirement Statements.

-The Personal Hygiene Statements should be revised to read:

"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."

- 3. The following ocular exposure statement must be added to the Statement of Practical Treatment section:

"If In Eyes: Flush with plenty of water. Call a physician if irritation persists."

- 4. The WPS exclusionary statement for "Ornamental Lawns and Turf" is incorrect under both Options I and II and should be revised to read:

"Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes."

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Stamped copies of the subject labels are enclosed for your records. Please submit (one) final printed copy for each of the above mentioned labels before releasing the products for shipment.

Sincerely yours,

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

Enclosures

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# TRIMEC® 800 HERBICIDE

A BRUSH & BROADLEAF WEED KILLER FOR BROADLEAF WEED CONTROL

One Gallon Covers Up To 4 Acres.  
8 Ounces Covers Up to 11,000 Square Feet.

Controls Ash, Aspen, Brambles, Kudzu, Oak, Willows,  
Dandelion, Chickweed, Knotweed, Plantains, Henbit, Spurge  
and many other species of brush and broadleaf weeds

### ACTIVE INGREDIENTS:

* Isooctyl (2-ethylhexyl) ester of 2,4-Dichlorophenoxyacetic acid.....	32.48%
** Isooctyl (2-ethylhexyl) ester of 2-(2,4Dichlorophenoxy) propionic acid ...	30.66%
*** Dicamba (3,6-dichloro-o-anisic acid).....	5.38%
INERT INGREDIENTS.....	<u>31.48%</u>
	TOTAL 100.00%

This product contains:

- ~2.0 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 21.54%
- ~1.9 lbs. 2-(2,4-Dichlorophenoxy) propionic acid equivalent per gallon or 20.72%.
- ~0.5 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 5.38%

Isomer Specific by AOAC Methods

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

## KEEP OUT OF REACH OF CHILDREN

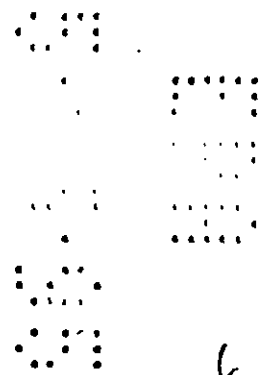
## CAUTION

See next panel for Statement of Practical Treatment  
and additional Precautionary Statements.

### NET CONTENTS U.S. GALLON

800/ AP  
 EPA REG. NO. 2217-651  
 EPA EST. NO. 2217-KS  
 Mfd. by PBI/GORDON CORPORATION  
 KANSAS CITY, MISSOURI 64101

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
JUN 9 1981  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
2217-651



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

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION:** Do not get in eyes, on skin or on clothing. Wear goggles, face shield, or safety glasses when handling. 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, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves. 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.

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 for a non-refillable container are emptied, the probe must be rinsed before removal.

If spills occur, collect the material and dispose of by following disposal instructions on this label.

**Statement of Practical Treatment**

In case of contact in eyes: flush with water for 15 minutes. Get medical attention.

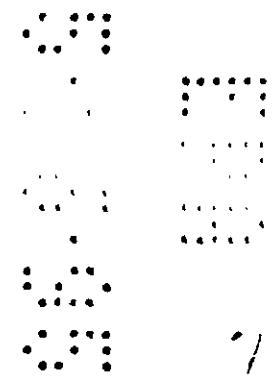
In case of contact with skin: wash with plenty of soap and water.

If Swallowed: Call a physician or Poison Control Center immediately. Contains petroleum solvent. Do not induce vomiting because of danger of aspirating liquid into lungs, causing serious damage and chemical pneumonia. If spontaneous vomiting occurs, keep head below hips to prevent aspiration, and monitor for breathing difficulty.

**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, 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 apply when weather conditions favor drift from target area. Do not contaminate domestic or irrigation waters.

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/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

**Physical or Chemical Hazard:** Do not use or store near heat or open flame.



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## DIRECTIONS FOR USE

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 areas until spray has dried or dust has settled.

Not for use on plants being grown (1) for sale or other commercial use, (2) for commercial seed production, or (3) for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

### 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 pets.

**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.

**PREPARATION OF THE SPRAY:** Add one-half the required amount of oil or water to the spray tank, then add this product with agitation and finally the balance of the water or oil with continued agitation. Use diesel oil. If this material is to be used in straight oil mixtures, do not let water get into it or the finish mixture. This material forms an emulsion in water — not a solution. This tends to separate on standing. Provide agitation to prevent such separation and ensure a uniform spray mixture.

### — FOR INDUSTRIAL SITES —

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 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.

### — ROADSIDES, DRAINAGE DITCHBANKS, RIGHT-OF-WAYS, RAILROADS, FIREBREAKS, FENCE-ROWS, INDUSTRIAL SITES & OTHER SIMILAR NON-CROP AREAS —

#### USE PRECAUTIONS:

- 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-drift 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 for a layering effect.



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- Do not apply when temperature exceeds 85°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 anti-drift additives and drift-reducing equipment is of value 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.

**INSTRUCTIONS:** To effectively control brush, all leaves, stems and suckers should be thoroughly wetted 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 broadleaf weeds are young and actively growing. Do not cut brush until the herbicide has translocated throughout the plant causing root death.

**HIGH VOLUME:** Mix at the rate of ½ to 1 gallon of product per 100 gallons of water and spray at the rate of 100 to 300 gallons of spray per acre. Rate per acre depends 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 use at the rate of 1 ounce to 1½ ounces per gallon of water.

**AERIAL FOLIAGE METHOD:** Mix ½ to 2 gallons of herbicide with enough water to make 15 to 25 gallons total spray mixture per acre. Use enough water to ensure uniform wetting of plants.

**BASAL BARK METHOD:** Apply with low volume backpack sprayer or power equipment. Volume sprayed per acre will depend on method used and number of stems per acre. Use a coarse spray to avoid drift.

**HIGH VOLUME:** Mix 3 to 5 gallons of herbicide per 95 to 97 gallons of diesel oil. Thoroughly wet the base and root collar of all items until the spray collects around the root collar at ground line. Concentration of spray mix will depend on volume of spray used, species present and season applied.

**LOW VOLUME:** Make up a solution of 33% TRIMEC 800 HERBICIDE, 10 to 20% surfactant (such as Cide-Kick, Cide-Kick II, or Arborchem Basal Oil) and 47 to 57% diesel oil. Spray to wet stems up to a height of 18 to 24 inches. Use higher concentration of surfactant in colder weather.

**CUT SURFACE — STUMP:** This method can be used at any time of the 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 and larger. Mix ½ to 1 gallon of herbicide with 25 gallons of diesel oil. Apply with a low volume knapsack sprayer using a solid cone nozzle of medium orifice.

**FRILL:** Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark, but do not remove chips. This method is recommended for cull trees 5 to 6 inches in diameter and larger. Treat freshly cut frills at any time of year. Mix 3 to 4 gallons of herbicide in 100 gallons of diesel oil. Pour in as much spray mixture as the frill will hold without wasting chemical.

**TANK-MIXING WITH GARLON® 4:** For any of the above methods, this product can be mixed with GARLON® 4 for use in roadsides, rights-of-ways, railroads, fencerows, industrial sites and other similar non-crop areas. Use at the rate of 1 gallon TRIMEC® 800 HERBICIDE plus 1 pint GARLON® 4. Do not mix the chemicals simultaneously. The best way to prepare the spray mixture is to start with one-third the water or oil to the spray tank. Add the TRIMEC® 800 HERBICIDE with agitation. Next add another third the water or oil to this mixture. Then add the GARLON® 4 and finally the balance of the water or oil, each step with continued agitation. A mixture of TRIMEC® 800 HERBICIDE and GARLON® 4 should be used in accordance with the more restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Aerial applications of this tank-mix can be made with helicopter only.

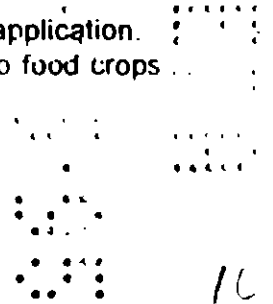
BRUSH CONTROLLED		
Ash	Cherry	Oak
Aspen	Cottonwood	Pine
Birch	Dogwood	Shortleaf Pine
Blackberry	Elm	Spruce
Black Cherry	Gooseberry	Sumac
Black Locust	Honey Locust	Sycamore
Brambles	Honeysuckle	Wild Plum
Buckbrush	Kudzu	Willow
Cedar	Multiflora Rose	
WEEDS CONTROLLED		
Bedstraw	Knotweed	Ragweed
Bindweed	Kochia	Sheep Sorrel
Black Medic	Lambsquarters	Shepherdspurse
Buckhorn	Lespedeza	Smartweed
Burdock	Mallow	Speedwell
Chicory	Momingglory	Spurge
Chickweed	Mustard	Sunflower
Clover	Nettle	Thistles
Cocklebur	Oxalis	Trumpet Vine
Dandelion	Peppergrass	Velvetleaf
Dock	Pigweed	Wild Carrot
Ground Ivy	Plantains	Wild Garlic
Healall	Poison Ivy	Wild Lettuce
Henbit	Poison Oak	Wild Onion
Jimsonweed	Purslane	Yarrow

ORNAMENTAL LAWNS & TURF (cool season grasses other than bentgrass): (One Gallon Covers up to 4 Acres.)

**FOR USE ON RESIDENTIAL AND OTHER TURF SITES EXCLUDING SOD FARMS.**

**USE PRECAUTIONS:**

- Do not apply this product through any type of irrigation system.
- Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions 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 trees and other ornamental species.
- 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.
- 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.



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**INSTRUCTIONS:** 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.

**GENERAL APPLICATION:** Apply at the rate of 2 to 3 pints of product in 20 to 260 gallons of water per acre (¾ fluid ounce to 1.1 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 0.8 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment is 2 per year.

**CONTROLLED DROPLET APPLICATOR:** Add 1½ pints to the HERBI container and fill with water. Spray contents over 33,000 square feet. Avoid overlapping between spray patterns.

**SMALL AREA APPLICATIONS:** Not recommended for hose-end sprayers. Spray at any time during the growing season when weeds are actively growing. On new lawns — wait until the grass has hardened off — usually after it has been mowed at least three times. Poor weed control may result if spray is applied during drought or just before rain. Do not water within 24 hours after treatment.

<b>PRESSURE SPRAYER</b>			
<b>Amount of Product</b>		<b>Amount of Water</b>	<b>Area to be Treated</b>
1½ Tablespoons	¾ fluid ounces	1 Gallon	1000 Square Feet
3 Tablespoons	1½ fluid ounces	2 Gallons	2000 Square Feet
4½ Tablespoons	2¼ fluid ounces	3 Gallons	3000 Square Feet

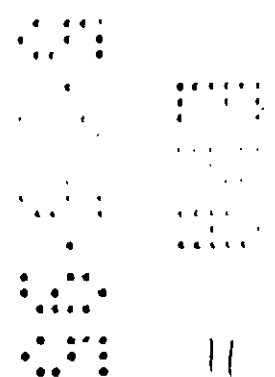
**LIMITED WARRANTY AND DISCLAIMER.**

The manufacturer warrants only that the chemical composition conforms to the ingredient statement given on the label and, that this product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOT 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.

GARLON® is a registered trademark of DowElanco.



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