

2217-651

04/19/2004

1/10



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

APR 19 2004

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Craig Martens  
PBI Gordon Corporation  
P.O. Box 014090  
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject: Label Revisions  
Trimec 800 Herbicide  
EPA Registration Number 2217-651  
Your Submission Dated July 29, 2003

The 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:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Modify the Hazards to Humans section to read as follows:

Causes substantial but temporary eye injury. Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin or clothing. Do not get in eyes or on clothing.

b. In the Engineering Control Statements heading delete "for WPS uses". The container limitations are applicable to all uses of 2,4-D. See EPA's letter dated October 30, 1992.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

We note that you have added Worker Protection Standard (WPS) text to the labeling. However, our review indicates that there are no agricultural uses registered for this product. If you wish, you may submit an application for amended registration without WPS text for our review. Refer to the previously accepted labeling for this product dated October 29, 1999.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391. For your assistance enclosed is a copy of the scientific review.

Sincerely yours,

JSI

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

Enclosure

3/10

# TRIMEC® 800 HERBICIDE

### ACTIVE INGREDIENTS:

Isooctyl (2-ethylhexyl) ester of 2,4-dichlorophenoxyacetic acid .....	32.48%
2-ethylhexyl ester of (+)-(R)-2-(2,4-dichlorophenoxy) propionic acid .....	15.33%
Dicamba: 3,6-dichloro-o-anisic acid .....	5.38%

INERT INGREDIENTS:.....	46.81%
TOTAL	100.00%

### THIS PRODUCT CONTAINS:

- 2.0 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 21.54%
- 0.96 lb. 2-ethylhexyl ester of (+)-(R)-2-(2,4-dichlorophenoxy) propionic acid equivalent per gallon or 10.36%
- 0.5 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 5.38%

CONTAINS PETROLEUM DISTILLATES.

Isomer Specific by AOAC Methods.

TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

**CONTAINS SINGLE ISOMER FORM OF DICHLORPROP-p**

## KEEP OUT OF REACH OF CHILDREN

## WARNING - AVISO

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See next panel for additional Precautionary Statements and First Aid.

**NET CONTENTS \_\_\_ U.S. GALLONS**

800/ AP-----

EPA Reg. No. 2217-651

EPA Est. No. 2217-KS-X

MANUFACTURED BY:



Telephone: 1-800-821-7925

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
**APR 19 2004**

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

2217-651



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

## PRECAUTIONARY STATEMENTS

### Hazards To Humans and Domestic Animals

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear. Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin. Harmful if inhaled. Avoid breathing vapor or spray mist.

### **Personal Protective Equipment (PPE):**

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

Applicators and other handlers must wear: • Long-sleeved shirt and long pants • Chemical-resistant gloves such as barrier laminate, nitrile rubber, neoprene rubber, or viton • Shoes plus socks • Protective eyewear • Chemical-resistant apron when cleaning equipment, mixing or loading.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### **Engineering Control Statements for WPS Uses:**

*Containers over 1 gallon and less than 5 gallons in capacity:* Mixers and loaders who do not use a mechanical system (probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

*Containers of 5 gallons or more in capacity:* Do not open-pour from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. (Note: This is not an option in California, see Calif. Code of Regulations, Article 2, Section 6746.) If the contents of a nonrefillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

### **USER SAFETY RECOMMENDATIONS:**

*Users should:*

- ◆ Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- ◆ Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- ◆ 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

<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>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.</p> <p><b>Note to Physician:</b> Contains Petroleum distillate—vomiting may cause aspiration pneumonia.</p>	

**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 washwater. 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-p have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and 2,4-DP-p 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.

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

**PHYSICAL OR CHEMICAL HAZARD:** 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.

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.

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 requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, 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 (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

6/10

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

PPE required 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, is:

- Coveralls
- Chemical-resistant gloves such as barrier laminate, nitrile rubber, neoprene rubber, or viton
- Shoes plus socks
- Protective eyewear.

**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.

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

**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 finished 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.

**ROADSIDES, RIGHT-OF-WAYS, RAILROADS, FIREBREAKS, FENCE-ROWS, INDUSTRIAL SITES AND OTHER SIMILAR NONCROP 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-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 for a layering effect.
- ◆ 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:

7/10

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.

### **Foliar 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 right-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, right-of-ways, railroads, fencerows, industrial sites and other similar noncrop 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 1/3 the water or oil to the spray tank. Add the Trimec® 800 Herbicide with agitation. Next add another third of 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.

8/10

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	Morningglory	Spurge
Chickweed	Mustard	Sunflower
Clover	Nettle	Thistle
Cocklebur	Oxalis	Trumpetvine
Dandelion	Peppergrass	Velvetleaf
Dock	Pigweed	Wild carrot
Ground ivy	Plantain	Wild garlic
Healall	Poison ivy	Wild lettuce
Henbit	Poison oak	Wild onion
Jimsonweed	Purslane	Yarrow

**ORNAMENTAL LAWNS AND TURF (COOL SEASON GRASSES OTHER THAN BENTGRASS):**

**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 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.



9/10

**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.

**PRESSURE SPRAYER**

Amount of Product		Amount of Water	Area to be Treated
1½ Tablespoons	¾ fluid ounces	1 Gallon	1,000 Square Feet
3 Tablespoons	1½ fluid ounces	2 Gallons	2,000 Square Feet
4½ Tablespoons	2¼ fluid ounces	3 Gallons	3,000 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 Dow AgroSciences, LLC.

**APPENDIX**

***1. Advertising claims that may be presented on the retail container:*** These claims may be presented on the retail container label or on the labeling accompanying the product.

- ◆ A brush and broadleaf weed killer for broadleaf weed control
- ◆ One gallon covers up to 4 acres.
- ◆ Eight ounces covers up to 11,000 square feet.
- ◆ Controls ash, aspen, brambles, kudzu, oak, willows, dandelion, chickweed, knotweed, plantain, henbit, spurge, and many other species of brush and broadleaf weeds.