

SEP 19 2002

Craig Martens  
PBI/Gordon Corporation  
P.O. Box 014090  
1217 West 17<sup>th</sup> Street  
Kansas City, MO 64104

Dear Mr. Martens:

SUBJECT: Conversion From MCPP to MCPP-p  
Gordon's Trimec Broadleaf Herbicide For Selective  
Grasses  
EPA Registration Number: 2217-655  
Your Submission Dated July 10, 2002

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 form [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 and Confidential Statement of Formula submitted 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 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, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised basic Confidential Statement of Formula dated July 10, 2002 has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

M. Cooke  
9-19-02

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

# GORDON'S TRIMEC® BROADLEAF HERBICIDE FOR SENSITIVE GRASSES

Bermudagrass, Bentgrass, Bluegrass, Fescues, Zoysiagrass,  
Centipedegrass, and St. Augustinegrass

- KEEP FROM FREEZING -

**ACTIVE INGREDIENTS:**

Dimethylamine salt of (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid.....	17.37%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	18.74%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid) .....	3.85%
INERT INGREDIENTS: .....	60.04%
TOTAL	100.00%

**THIS PRODUCT CONTAINS:**

1.32 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 14.35%.

1.44 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 15.57%.

0.30 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 3.20%.

Isomer Specific by AOAC Methods.

Contains the 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 Precautionary Statements  
and Statement of Practical Treatment.

NET CONTENTS \_\_\_\_\_ U.S. GALLON

896/ AP  
EPA REG. NO. 2217-655  
EPA Est. No. 2217-KS-1  
MANUFACTURED BY:



ACCEPTED  
with COMMENTS  
in EPA Letter Dated

SEP 19 2002

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
2217-655



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

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**DANGER:** Corrosive. Causes damage to eyes. Do not get into eyes, on skin or clothing. Harmful if swallowed or inhaled. Avoid exposure to spray mist. Wear face shield or goggles when mixing, loading or applying this product. 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.

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.

**Engineering Control Statements:**

*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 non-refillable 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 SWALLOWED:~~ Drink one or two 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.

~~IF ON SKIN:~~ Wash promptly with soap and water. Rinse thoroughly.

**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 swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless instructed by a poison control center or doctor.</li> <li>• 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 by mouth-to-mouth, if possible.</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>
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency, call toll free 1-877-800-5556.</p>	

**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 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.

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

For use on residential and other turf sites excluding sod farms.

**STORAGE & DISPOSAL**

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

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

**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 by other procedures approved by state and local authorities. If burned stay out of smoke.

**OTHER USE PRECAUTIONS - OBSERVE CAREFULLY.**

Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Do not use on lippia or dichondra nor on lawns or turf where desirable clovers are present.

Use only lawn type sprayers. *Note:* Coarse sprays are less likely to drift. Do not spray roots of trees and ornamentals. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species.

Do not spray while grass is emerging from dormancy. Do not apply to newly seeded lawns until after the second or third mowing. Do not spray when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application. Do not contaminate domestic or irrigation waters.

Be careful not to overdose centipedegrass or St. Augustinegrass. These species are sensitive to 2,4-D, a component of this product.

After using this product, clean sprayer with soap or detergent and water, and rinse thoroughly before applying other pesticides. Failure to observe the above precautions may result in injury.

Do not apply this product through any type of irrigation system.

**HOW MUCH TO USE AND WHERE:**

The maximum application rate to turf is 0.6 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

***Bermudagrass and Bentgrass:***

Use 2.0 pints of product per acre. Do not overdose closely-mowed bentgrass. Read the use precautions and observe carefully. Do not use more than the recommended rate. Bermudagrass and bentgrass are moderately sensitive to 2,4-D.

***Bluegrass, Fescues, and Zoysiagrass:***

Use 2.0 to 3.0 pints of product per acre. These species are tolerant to 2,4-D. However, do not overdose.

***St. Augustinegrass and Centipedegrass:***

Use 1 to 1.5 pints of product per acre. Repeat after 3 weeks if necessary. Do not overdose. Do not apply this product to St. Augustinegrass or centipedegrass during spring green-up which is the transition period between dormancy and active growth. Do not make applications when ambient temperature is below 50°F or above 90°F, or expected to be within 72 hours of application. Do not make applications when grass is under stress from drought, insects, or other herbicides.

St. Augustinegrass and centipedegrass are sensitive to 2,4-D and great care should be taken to prevent overdosing. Cultivars vary in tolerance to this product. Do not apply this product to 'Floritam' St. Augustinegrass.

**GENERAL:**

Mix in 5 to 300 gallons of water per acre. Use higher rates when weeds are dense or in flower. If hardy weeds persist, make a second application after three weeks. Apply when weeds are young and actively growing. Avoid applications during long excessively dry or hot periods. When grasses are under stress use reduced rates to reduce potential injury. Do not irrigate within 24 hours of application. Do not apply to newly seeded turf until after the second or third mowing. Seed can be sown 3 to 4 weeks after application at recommended rates.

<b>- BROADLEAF WEEDS -</b>		
Aster, white heath & white prairie	False dandelion (*spotted catsear & common catsear)	Poison ivy
Bedstraw	Field bindweed (*morningglory & creeping jenny)	Poison oak
Beggarweed, creeping	Field oxeye-daisy (*creeping oxeye)	Prostrate knotweed (*knotweed)
Bindweed	Filaree, whitestem & redstem	Puncturevine
Black medic	Florida pusley	Purslane
Broadleaf plantain	Ground ivy	Ragweed
Buckhorn plantain	Groundsel	Red sorrel (*sheep sorrel)
Bull thistle	Hawkweed	Shepherdspurse
Burclover	Healall	Spotted spurge
Burdock, common	Henbit	Spurge
Buttercup, creeping	Lambsquarters	Thistle
Carpetweed	Lawn burweed	<i>Veronica</i> (*corn speedwell)
Chickweed, common	Lespedeza, common	Virginia buttonweed
Chicory	Mallow, common	White Clover (*Dutch clover, honeysuckle clover, white trefoil & purplewort)
Cinquefoil	Matchweed	Wild carrot
Clover	Mouseear chickweed	Wild garlic
Compassplant	<i>Oxalis</i> (*yellow woodsorrel & creeping woodsorrel)	Wild geranium
Curly dock	Parsley-piert	Wild mustard
Dandelion	Pennsylvania smartweed	Wild onion
Dayflower	Pennywort (*dollarweed)	Wild strawberry
Deadnettle	Pepperweed	Wild violet
Dock	Pigweed	Yarrow
Dogfennel	Pineappleweed	Yellow rocket
English daisy	Plantain	

\*Synonyms

**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.