

2217-694

9-25-2003

1/8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 25 2003

Craig Martens
PBI/Gordon Corp.
P.O. Box 014090
Kansas City, Missouri 64101

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
EPA Registration No. 2217-694
Trimec Broadleaf Herbicide
Your Submission Dated May 15, 2003

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 forms [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 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 basic and three (3) alternate Confidential Statements of Formula (CSFs) 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.

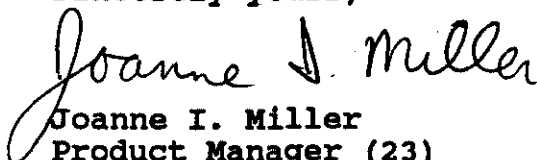
A copy of the revised basic and three (3) alternate Confidential Statements of Formula, dated May 14, 2003 have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSF's for this product.

| | | | | | | | | |
|---------|--|--|--|--|--|--|--|--|
| 7505C | | | | | | | | |
| Martens | | | | | | | | |
| 9/25/03 | | | | | | | | |

- 2 -

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

3/8

TRIMEC® BROADLEAF HERBICIDE

ACTIVE INGREDIENTS:

| | |
|---|---------------|
| Dimethylamine salt of 2,4-dichlorophenoxyacetic acid..... | 30.56% |
| Dimethylamine salt of (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid..... | 8.17% |
| Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)..... | 2.77% |
| INERT INGREDIENTS:..... | <u>58.50%</u> |
| TOTAL | 100.00% |

THIS PRODUCT CONTAINS:

2.38 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 25.38%
 0.63 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 6.75%
 0.21 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 2.30%
 TRIMEC® is a registered trademark of PBI/Gordon Corporation.
 Isomer Specific by AOAC Methods.
 Contains the single isomer form of Mecoprop-p.

KEEP OUT OF REACH OF CHILDREN

D A N G E R

See side panels for additional Precautionary Statements and Statement of Practical Treatment.

- KEEP FROM FREEZING -

NET CONTENTS 2.5 U.S. GALLONS

899/ APxxxxxx
 EPA Reg. No. 2217-694
 EPA Est. No. 2217-KS-1
 MANUFACTURED BY:

 An Employee-Owned Company
 1217 West 12th Street
 Kansas City, Missouri 64101
 Telephone: 1-800-821-7925

ACCEPTED
~~XXXXXXXXXX~~
 In EPA Letter Dated

SEP 25 2003
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-694

4/8



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes eye damage and skin irritation. Do not get into eyes, on skin or on clothing. Harmful or fatal if swallowed. 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 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 ON SKIN: Wash promptly with soap and water. Rinse thoroughly. If irritation develops get medical attention.

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.

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.

5/8

DIRECTIONS FOR USE

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

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 dusts has settled.

STORAGE AND 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 or pets. 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: For Plastic Containers - 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. For Metal Containers - 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.

USE PRECAUTIONS:

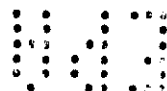
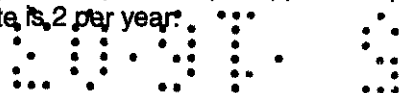
Do not apply this product through any type of irrigation system. Avoid drift of spray mist to vegetables, flowers, ornamentals, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Do not spray on carpetgrass, dichondra nor on lawns or turf where desirable clovers are present. Do not apply this product to 'Floratam' St. Augustinegrass. Use only lawn type sprayers. Coarse sprays are less likely to drift. Use coarse spray droplets. Avoid fine mists. 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 this product to warm season grasses during spring green-up which is the transition period between dormancy and active growth. Do not apply to newly seeded grasses until well established. Do not broadcast apply when air temperatures exceed 85°F; some injury may be expected with spot treatments when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application at recommended rate. 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.

ORNAMENTAL LAWNS & TURF (INSTRUCTIONS):

Apply 2.3 to 4.0 pints of product per acre in sufficient water for adequate coverage. [For gallons: This container (128 fluid ounces or 1 gallon) will treat 2.0 - 3.5 acres of turfgrass. (or) One gallon covers up to 152,460 square feet.]

Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid applying during long excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours of application. Do not apply to newly seeded turf until after the second or third mowing. Grass seed can be sown 3 to 4 weeks after application. Do not use on dichondra and carpetgrass.

The maximum application rate to turf is 1.3 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.



6/8

| APPLICATION TYPE | DIRECTIONS |
|---|--|
| Kentucky bluegrass, fescue & perennial ryegrass | <p><i>Professional Lawn Maintenance or Mature Weeds:</i> Use 2.3 to 4.0 pints of product per acre. Or, use 0.84 to 1.5 fluid ounces of product per 1,000 square feet with spray volumes of 0.5 to 5.0 gallons of spray solution per 1,000 square feet. The best time to control clover is in the fall. When making a spring application to control clover a 4 pints per acre rate is recommended.</p> <p><i>Controlled Droplet Applicator:</i> Reduced rates must be used when grass is stressed from heat or drought. Do not use on St. Augustinegrass or centipede grass. Add 2.0 pints Trimec® Broadleaf Herbicide to the Herbi container, then fill with 3.0 pints of water. Spray entire contents over 33,000 square feet (approx. 0.75 acre). Do not overlap between spray patterns.</p> |
| Bermudagrass & zoysiagrass | <p>Apply 3.0 to 4.0 pints of product per acre with spray volumes ranging from 20 to 220 gallons per acre. The equivalent application rates are 1.1 to 1.5 fluid ounces of product per 1,000 square feet with spray volumes of 0.5 - 5.0 gallons of spray solution per 1,000 square feet. Some hybrid bermudagrass may be sensitive to this product. Contact your local Extension Service Weed Control Specialist.</p> |
| St. Augustinegrass | <p>Apply 2.3 pints of product in up to 150 gallons of water per acre (1.2 fluid ounces in 5.0 gallons of water per 1,500 square feet). Do not spray St. Augustinegrass if stressed from heat, drought, etc. Slight turf yellowing should disappear after about one week. Do not apply this product to 'Floritam' St. Augustinegrass.</p> |
| Bentgrass | <p>On closely mowed bentgrass (putting and bowling greens) apply at a maximum rate of one fluid ounce of product in 5 gallons of water per 1,500 square feet - preferably in May or mid-August through September. Slight turf yellowing will disappear after about one week.</p> |
| <p><i>Note:</i> Care should be taken to avoid overdosing bentgrass and St. Augustinegrass or injury may result. High spray volumes (i.e. one fluid ounce in 5.0 gallons of water per 1,500 square feet) will aid in obtaining uniform coverage. If hand operated sprayers are used, it is preferable to use a single nozzle rather than a multiple nozzle boom. Sweeping movements with a multiple nozzle boom will result in heavy local over application and subsequent turf discoloration or injury.</p> | |

| TRIMEC® BROADLEAF HERBICIDE CONTROLS: | | |
|--|---------------|----------------|
| Bedstraw | Henbit | Purslane |
| Black medic | Knotweed | Ragweed |
| Buckhorn | Lambsquarters | Sheep sorrel |
| Burdock | Lespedeza | Shepherdspurse |
| Chicory | Mallow | Speedwell |
| Chickweed | Morningglory | Spurge |
| Clover | Peppergrass | Wild carrot |
| Dandelion | Pigweed | Wild garlic |
| Dock | Plantain | Wild lettuce |
| Ground ivy | Poison ivy | Wild onion |
| Healall | Poison oak | Yarrow |

7/8

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.

0001 9

1 1 1 1

APPENDIX

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

- ◆ Treats northern and southern grasses including zoysia, bermuda, St. Augustine, Kentucky bluegrass, ryegrass, fescue and bentgrass.

◆



- ◆ Controls dandelion, knotweed, henbit, chickweed, plantain, spurge and many other broadleaf weeds, including those listed on this label.
- ◆ One gallon covers up to 3.5 acres
- ◆ One gallon covers up to 152,460 square feet
- ◆ One quart covers up to 38,115 square feet
- ◆ *For quarts:* This container (32 fl.oz. or 1 quart) will treat 0.5 - 0.87 acre of turfgrass.
- ◆ *For gallons:* This container (128 fl.oz. or 1 gallon) will treat 2.0 - 3.5 acres of turfgrass.

