



7/7/2010

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

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JUL -7 2010

Subject: Label Amendment – Response to PBI/Gordon’s Rebuttal of Reregistration letter dated August 5, 2009 that required changing the signal word from “Caution” to “Danger”
Product Name: Trimec Lawn Weed Killer For Southern or Northern Grasses
EPA Registration Number: 2217-695
Decision Number: 429690

The label amendment referred to above (maintaining the “Caution” signal word and associated language), submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provide the following changes are made to the product label:

1. Per the acute toxicity review completed in the Registration Division, revise the ‘Hazards to Humans and Domestic Animals’ statement to read as follows:
“CAUTION:
Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt, long pants, socks, shoes and gloves. Remove and wash contaminated clothing before reuse.”

Note: While no additional data is being requested at this time, marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting marketing claims made on the product label is not available then those claims must be removed.

Note: Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment.

Sincerely,

Kathryn V. Montague
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

2008

TRIMEC® LAWN WEED KILLER FOR SOUTHERN OR NORTHERN GRASSES

EPA Reg. No. 2217-695

ACTIVE INGREDIENT:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid	3.33%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid	1.91%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)	0.81%
OTHER INGREDIENTS:	93.95%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.232 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 2.75%
- 0.134 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 1.59%
- 0.057 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 0.68%

Isomer Specific by AOAC Methods.

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

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL - 7 2010
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.

2217-695

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Harmful if swallowed. Wear long-sleeved shirt, long pants, and shoes plus socks. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid	
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or on clothing:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor for treatment advice.



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If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<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>	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate. This chemical has properties and characteristics associated with chemicals detected in groundwater.

The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

[Environmental Hazards (alternate per PRN 2008-1)

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.]

DIRECTIONS FOR USE

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

PRECAUTIONS AND RESTRICTIONS:

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until sprays have dried.
- Use only lawn-type sprayers. Do not exceed specified dosages for any area. This product may be injurious to St. Augustinegrass, bentgrass and centipedegrass under conditions of high temperature and moisture. Under these conditions or in cases of accidental overdose, some slight temporary discoloration of the St. Augustinegrass may occur. Cultivars vary in tolerance to this product. Do not apply this product to 'Floritam' St. Augustinegrass.
- Do not apply as a fine mist because of potential for injury to desirable plants.
- Do not use this product on or near desirable plants, including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs, since injury may result.
- Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day. Rinse applicator over lawn area only.

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WHERE TO USE:

Trimec® Lawn Weed Killer for Southern or Northern Grasses is a combination of three proven herbicides - 2,4-D, Mecoprop-p and Dicamba. This formulation will control a wide range of broadleaf weeds in residential and ornamental lawns. Established turf of northern (cool season) and southern (warm season) grasses may be treated. The northern (cool season) turfgrasses include Kentucky bluegrass, perennial ryegrass and the fescues. The southern (warm season) turfgrasses include St. Augustinegrass, centipede grass, bentgrass, bahiagrass and bermudagrass.

WHEN TO USE:

For best results spraying should be done when broadleaf weeds are young and actively growing. Older weeds will be harder to kill.

1. Spray at any time during the growing season when weeds are actively growing, although spray works faster with temperatures above 70°F. To avoid damage do not apply to St. Augustinegrass or centipede grass while emerging from winter dormancy. Damage may also occur on these grasses if temperatures drop below 45°F within 72 hours of application. Avoid spraying St. Augustinegrass when temperatures are above 90°F and under conditions of high humidity. Under these conditions or in cases of accidental overdose, some slight temporary discoloration of the St. Augustinegrass may occur.
2. Irrigate the lawn 2 or 3 days prior to spraying to ensure that weeds are growing and able to absorb the herbicide.
3. Mow 1 to 2 days before treating.
4. On new lawns, wait until the grass has reached a height of 2 inches before making a broadcast application. However, a spot treatment may be made at any time with a pressure sprayer. Wait 3 weeks before seeding grass, planting sprigs or planting stolons.
5. Do not water for 24 hours after treatment.
6. Do not mow for 48 hours after treatment.

Poor weed control may result if spray is applied during drought or just before rain.

Limitations on broadcast applications to residential turfgrass:

The maximum application rate is 5.3 fl.oz. of product per 1,000 sq.ft. per application (0.24 lb 2,4-D ae, 0.42 lb MCP-p ae and 0.10 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 10.6 fl.oz. of product per 1,000 sq.ft. (0.48 lb 2,4-D ae, 0.84 lb MCP-p ae and 0.20 lb dicamba ae per acre).

Limitations on spot treatments to residential turfgrass:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 5.3 fl.oz. per 1,000 sq.ft. per application (0.42 lb MCP-p acid equivalent per acre). The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

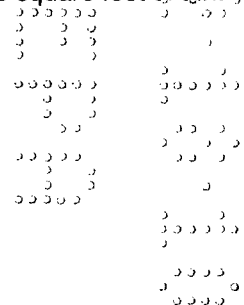
OPTION (1) UNIT PACKAGING. (The entire contents of the container are to be applied in a single application. A siphon tube and a hose end sprayer are attached to the immediate containers.)

HOW TO USE:

No mixing of this product with water is required. For the southern (warm season) grasses, apply the entire contents of this container (32 fluid ounces) on 8,000 square feet of turf. For the northern (cool season) grasses, apply the entire contents of the container (32 fluid ounces) on 6,000 square feet of turf. The assembly and application instructions are presented as follows:

ASSEMBLY INSTRUCTIONS:

1. Attach siphon tube to hose end sprayer attachment.
2. Remove cap from bottle and insert sprayer attachment.



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- Securely tighten sprayer attachment on bottle.
- Screw hose into hose end sprayer attachment.

APPLICATION INSTRUCTIONS:

- Turn on water. TO START FLOW OF PRODUCT: Place finger over hole on top right side of sprayer attachment. Hold about 3 feet above area to be treated, moving at a steady pace to ensure uniform coverage.
- TO STOP FLOW OF PRODUCT: Remove finger from hole to break siphon action. NOTE: To ensure adequate coverage, use moderate to high water pressure when applying through hose-end sprayer attachment.

OPTION (2) HOSE END SPRAYERS.

HOW TO USE:

For southern (warm season) grasses, apply 4 fluid ounces of product per 1,000 square feet of turf. Refer to the spray preparation chart for southern grasses for areas larger than 1,000 square feet. Pour the recommended amount of product (Column 1) in bottle and add water to indicated level (Column 2), and spray on area shown in Column 3. For example, to spray 2,500 square feet measure 10 fluid ounces (20 tablespoons) in jar, add water to the 10 gallon level, and mix. Turn on water and spray uniformly over 2,500 square feet.

SOUTHERN GRASSES (Including St. Augustinegrass, centipedegrass, bentgrass, bahiagrass and bermudagrass.):

Column 2 Amount of Product		Column 2 Fill Bottle To (Gallons)	Column 3 Area to Treat (Square Feet)
(Tablespoons)	(Fluid Ounces)		
10	5	3	1250
20	10	5	2500
30	15	8	3750
40	20	10	5000

For Northern (cool season) grasses apply 5.33 fluid ounces per 1,000 square feet of established turf. Refer to the spray preparation charts for cool season grasses for areas larger than 1,000 square feet.

NORTHERN GRASSES (Including Kentucky bluegrass, perennial ryegrass and the fescue species.):

Column 2 Amount of Product		Column 2 Fill Bottle To (Gallons)	Column 3 Area to Treat (Square Feet)
(Tablespoons)	(Fluid Ounces)		
10	5	3	938
20	10	5	1876
30	15	8	2814
40	20	10	3752

OPTION (3) For small areas with knapsack sprayers, backpack sprayers, cart sprayers, pressure sprayers or other manually operated sprayers.

Determine the area by measuring and prepare the appropriate amount of spray mixture. Refer to the spray preparation charts for southern and northern grasses presented below.

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SOUTHERN GRASSES (Including St. Augustinegrass, centipedegrass, bentgrass, bahiagrass and bermudagrass):

Amount of Product		Water Volume (Gallons)	Area to Treat (Square Feet)
(Tablespoons)	(Fluid Ounces)		
8	4	1	1000
24	12	3	3000

NORTHERN GRASSES (Including Kentucky bluegrass, perennial ryegrass and the fescue species):

Amount of Product		Water Volume (Gallons)	Area to Treat (Square Feet)
(Tablespoons)	(Fluid Ounces)		
10 2/3	5 1/3	1	1000
32	16	3	3000

For Spot Treatments of Individual Weeds In Southern or Northern Turfgrasses - Mix 2 fluid ounces of product with 1 gallon of water. Thoroughly wet individual weeds. Do not use hose end applicators for spot treatments.

BROADLEAF WEEDS			
Annual yellow sweetclover	Cockle	Mustard	Spiny amaranth
Aster	Cocklebur	Narrowleaf plantain	Spiny cocklebur
Austrian fieldcress	Common mullein	Narrowleaf vetch	Spiny sowthistle
Bedstraw	Creeping jenny	Nettle	Spotted catsear
Beggarticks	Cudweed	Orange hawkweed	Spotted spurge
Betony, Florida	Curly dock	Oriental cocklebur	Spurweed
Bindweed, field	Daisy, English	Oxalis	Stinging nettle
Bird vetch	Daisy fleabane	Parsley-piert	Strawberry, India mock
Bitter wintercress	Daisy, oxeye	Parsnip	Tall nettle
Bittercress, hairy	Dandelion	Pearlwort	Tall vervain
Bitterweed	Dichondra	Pennycress	Tansy ragwort
Black-eyed Susan	Dogbane	Pennywort	Tansy mustard
Black medic	Dogfennel	Peppergrass	Tanweed
Black mustard	Dollarweed	Pepperweed	Thistle
Blackseed plantain	False dandelion	Pigweed	Trailing crownvetch
Blessed thistle	False flax	Pineywoods bedstraw	Tumble mustard
Bloodflower milkweed	False sunflower	Plains coreopsis (tickseed)	Tumble pigweed
Blue lettuce	Fiddleneck	Plantain	Velvetleaf
Blue vervain	Florida pusley	Poison ivy	Venice mallow
Bracted plantain	Frenchweed	Poison oak	Virginia buttonweed
Brassbuttons	Galinsoga	Pokeweed	Virginia creeper
Bristly oxtongue	Goathead	Poorjoe	Virginia pepperweed
Broadleaf dock	Goldenrod	Prairie sunflower	Wavyleaf bullthistle
Broadleaf plantain	Ground ivy	Prickly lettuce	Western clematis
Broomweed	Gumweed	Prickly sida	Western salsify
Buckhorn	Hairy fleabane	Prostrate knotweed	White mustard
Buckhorn plantain	Hawkweed	Prostrate pigweed	Wild aster
Bulbous buttercup	Healall	Prostrate spurge	Wild buckwheat
Bull thistle	Heartleaf drymary	Prostrate vervain	Wild carrot
Bullnettle	Heathaster	Puncturevine	Wild four-o'clock
Burclover	Hedge bindweed	Purslane, common	Wild garlic
Burdock	Hedge mustard	Ragweed	Wild geranium
Burning nettle	Hemp	Red sorrel	Wild lettuce
Burweed	Henbit	Redroot pigweed	Wild marigold
Buttercup	Hoary cress	Redstem filaree	Wild mustard
Buttonweed	Hoary plantain	Rough cinquefoil	Wild onion
Canada thistle	Hoary vervain	Rough fleabane	Wild parsnip
Carolina geranium	Horsenettle	Russian pigweed	Wild radish
Carpetweed	Jimsonweed	Russian thistle	Wild rape
Catchweed bedstraw	Knawel	Scarlet pimpernel	Wild strawberry

BROADLEAF WEEDS			
Catnip	Knotweed	Scotch thistle	Wild sweet potato
Catsear	Kochia	Sheep sorrel	Wild vetch
Chickweed, common	Lambsquarters	Shepherdspurse	Woodsorrel
Chickweed, mouseear	Lespedeza	Slender plantain	Woolly croton
Chicory	Mallow	Smallflower galinsoga	Woolly morningglory
Cinquefoil	Matchweed	Smooth dock	Woolly plantain
Clover, crimson	Mexicanweed	Smooth pigweed	Wormseed
Clover, hop	Milk vetch	Sorrel	Yarrow
Clover, red	Morningglory	Sowthistle	Yellow rocket
Clover, strawberry	Mouseear hawkweed	Spanishneedles	Yellowflower pepperweed and other broadleaf weeds
Clover, sweet	Mugwort	Speedwell	
Clover, white	Musk thistle		

STORAGE AND DISPOSAL
 Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or www.website.com for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- For use on southern grasses including St. Augustinegrass, Centipedegrass, Bentgrass, Bahiagrass, and Bermudagrass
- For use on northern grasses including Kentucky bluegrass, perennial ryegrass, and the fescue species.

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- One Quart Covers Up To 8,000 Square Feet.
- KEEP FROM FREEZING

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00695.20100215.resub-proposed-clean.doc
2. **Reason for Issue:** Response to EPA comments, PRN 2007-4

002217-00695.20100215.resub-proposed-clean.doc