

2217-709

05-20-2009

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

MAY 20 2009

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

James L. Kunstman, Ph.D.
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101

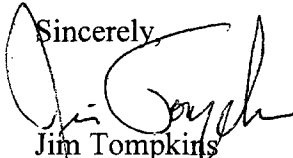
Subject: Label Amendment – Arsenic Agreement Revisions
Quadmec Turf Herbicide
EPA Reg. No. 2217-709
Application Dated April 13, 2009

Dear Dr. Kunstman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following changes:

1. Revise the heading from "Inert Ingredients" to "Other Ingredients".
2. Revise the first sentence in the Environmental Hazards section to read "This pesticide ~~may be~~ is toxic to fish and aquatic invertebrates and may adversely affect non-target plants."
3. Revise the Storage and Disposal statement to read "Do not contaminate water, food, or feed by storage ~~or~~ and disposal."
4. Revise the Container Disposal section as stated in PR Notice 2007-4.
5. Move the "Established Bermudagrass and Zoysiagrass" section so that it is directly above the "Established Kentucky Bluegrass, Perennial Ryegrass, Tall Fescue, Turf-Type Tall Fescues (Improved and Low Growing)" section.
6. Please note that all of the effective dates listed are still pending final review of the organic arsenicals agreement's comments.

The amended label supercedes all previously accepted labels. A stamped copy of the label is enclosed for your records. Submit one copy of final printed labeling incorporating the above changes before you release this product for shipment.

Sincerely,

Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

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ACCEPTED
with COMMENTS
in EPA Letter Dated

QUADMEC® TURF HERBICIDE

MAY 20 2009

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

EPA Reg. No. 2217-709

2217-709

ACTIVE INGREDIENT:

| | |
|--|---------|
| Monosodium acid methanearsonate | 18.00% |
| Dimethylamine salt of 2,4-dichlorophenoxyacetic acid | 5.83% |
| Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid | 2.93% |
| Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid | 1.46% |
| INERT INGREDIENTS: | 71.78% |
| TOTAL..... | 100.00% |

THIS PRODUCT CONTAINS:

- 1.80 lb monosodium methanearsonate per gallon or 18.00%. Total Arsenic (as elemental) all in water soluble form 8.33%.
 - 0.48 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 4.84%
 - 0.24 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 2.42%
 - 0.12 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 1.21%
- Isomer Specific by AOAC Method.

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 some one to explain it to you in detail.)

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

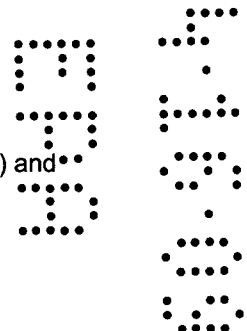
WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if swallowed. Harmful if absorbed through skin. **Avoid contact with skin.** Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

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

All mixers, loaders, applicators and other handlers must wear:

- protective eyewear,
- long-sleeved shirt and long pants,
- shoes and socks, plus
- chemical-resistant gloves (except for applicators using ground boom equipment) and



- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

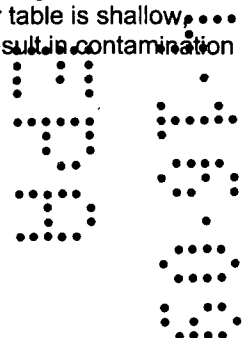
| | |
|---|--|
| User Safety Recommendations | |
| <ul style="list-style-type: none"> • Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. • Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water. • Users should 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 | |
| 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 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 by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| 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. |
| If inhaled: | <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice. |
| <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 may be toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters 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.



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.

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 worn over short-sleeved shirt and short pants,
- chemical-resistant footwear plus socks,
- chemical-resistant gloves made of any water-proof material,
- chemical-resistant headgear for overhead exposure and
- 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 enter or allow people (or pets) to enter the treated area until sprays have dried.

For use ~~on residential and~~ ornamental turfgrass sites and sod farms.

APPLICATION INFORMATION AND USE PRECAUTIONS:

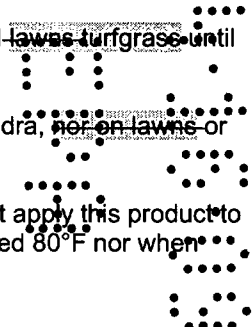
Do not apply this product through any type of irrigation system. Do not pour spray solutions near these plants. Do not use a hose end sprayer.

Do not exceed specified dosages for any area. 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 spray while grass is emerging from dormancy. Do not apply to newly seeded ~~lawns turfgrass until~~ after the third mowing. Seed can be sown 3 to 4 weeks after application.

Do not use on St. Augustinegrass, centipedegrass, carpetgrass, red fescues, dichondra, ~~nor on lawns or~~ turf where desirable clovers are present.

Weed control is best achieved when temperatures are above 70°F. However, do not apply this product to Kentucky bluegrass, tall fescue, or turf-type tall fescues when air temperatures exceed 80°F nor when



drought conditions exist. Do not apply this product to bermudagrass or zoysiagrass when air temperatures exceed 90°F nor when drought conditions exist.

Be sure soil is moist and lawn healthy before application. Temporary discoloration may occur and high spray volumes may reduce the turf discoloration. If turf is showing stress due to high temperatures and/or drought, irrigation is recommended 2 to 3 days after treatment.

Failure to observe these use precautions may result in injury.

After using this product, clean sprayer with Gordon's® Spray Tank Cleaner and rinse thoroughly with water before applying other pesticides.

Do not apply this product in Florida (after December 31, 2010). Aerial application is prohibited.

ESTABLISHED BERMUDAGRASS AND ZOYSIAGRASS:

Mix 3 to 5 fluid ounces of Quadmec® Turf Herbicide in 1 to 3 gallons of water for treatment of 1,000 square feet or 1 to 1 2/3 gallons of Quadmec® Turf Herbicide in 50 to 100 gallons of water for treatment of one acre of turf. Better control is obtained by making applications shortly after crabgrass emergence in the spring which will also control surviving winter annual broadleaf weeds and emerged summer annual broadleaf weeds. A second application may be necessary for dense weed populations, especially dallisgrass. Do not apply this product to bermudagrass or zoysiagrass when air temperatures exceed 90°F nor when turf is under stress such as drought.

Zoysiagrass cultivars may vary in the levels of tolerance to applications containing MSMA.

Limitations on broadcast treatments for ornamental turfgrass:

The maximum application rate is 1.67 gallons of product per acre per application (0.80 lb 2,4-D ae, 0.40 lb MCP-p ae, and 0.20 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 3.34 gallons of product per acre (1.60 lb 2,4-D ae, 0.80 lb MCP-p ae, and 0.40 lb dicamba ae per acre).

Application restrictions for golf courses:

For newly constructed golf courses, one broadcast application is allowed. For all other applications to golf courses, only spot treatments (100 square feet maximum per spot) are allowed. A spot treatment must not exceed 25% of total golf course acreage per year. After December 31, 2015, applications to golf courses are prohibited.

Limitations on broadcast treatments for sod farms:

The maximum application rate is 1.67 gallons of product per acre per application (0.80 lb 2,4-D ae, 0.40 lb MCP-p ae, and 0.20 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 21 days between applications. The maximum seasonal rate is 3.34 gallons of product per acre (1.60 lb 2,4-D ae, 0.80 lb MCP-p ae, and 0.40 lb dicamba ae per acre).

Application restrictions for sod farms:

Only 2 broadcast applications are allowed per season. Do not apply within 25 feet of permanent water bodies or aquatic habitat, including, but not limited to, lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries. After December 31, 2015, applications to sod farms are prohibited.

ESTABLISHED KENTUCKY BLUEGRASS, PERENNIAL RYEGRASS, TALL FESCUE, TURF-TYPE TALL FESCUES (IMPROVED AND LOW GROWING):

Mix 3 fluid ounces of Quadmec® Turf Herbicide in 1 to 3 gallons of water for treatment of 1,000 square feet of turf or 1 gallon of Quadmec® Turf Herbicide in 50 to 100 gallons of water per acre of turf. Make a second application at the same rate. Make spring applications to newly emerged crabgrass and for broadleaf weed control including oxalis. Summer applications can be made to more mature crabgrass.

and to broadleaf weeds. Do not apply this product to Kentucky bluegrass, tall fescue, or turf-type tall fescues when air temperatures exceed 80°F nor when turf is under stress such as drought.

Injury from this product may occur to mixed stands of Kentucky bluegrass and red fescues (chewings fescue, creeping fescue, and spreading fescues). If you are unwilling to accept some degree of turf injury, then do not use this product for mixed stands.

SPOT TREATMENTS FOR ESTABLISHED BERMUDAGRASS, ZOYSIAGRASS, KENTUCKY BLUEGRASS, PERENNIAL RYEGRASS, TALL FESCUE, AND TURF-TYPE TALL FESCUE:

Mix 3 fluid ounces of Quadmec® Turf Herbicide in 1 gallon of water for treatment of 1,000 square feet of turf. Spray the target weeds thoroughly and wet the entire leaf surface of the undesirable plants. Withhold sprinkling or irrigation for 24 hours after application. Temporary discoloration of the turfgrass may occur.

Limitations on spot treatments for ornamental turfgrass:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 3.0 fl.oz. per 1,000 sq.ft. per application (0.25 lb MCPP-p acid equivalent per acre).

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

Use only Medium or coarser spray nozzles according to ASAE (S 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

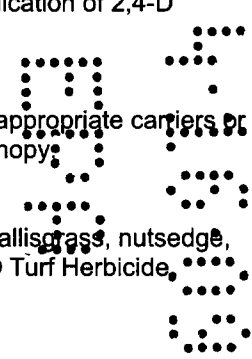
Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates. Do not apply with a nozzle height greater than 4 feet above the crop canopy.

Weed spectrum

This product controls a wide variety of problem weed species including crabgrass, dallisgrass, nutsedge, spurge, dandelion and oxalis. Refer to partial list of weeds controlled by Quadmec® Turf Herbicide.



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

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

PESTICIDE STORAGE: Store in original container in a locked storage area. 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 incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke.

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 selective control of grass and broadleaf weeds in bermudagrass, bluegrass, tall fescue, turf-type tall fescue, and zoysiagrass turf.
- One gallon covers up to one acre.
- Keep from freezing.
- Shake well before using.
- QUADMEC® and TRIMEC® are registered trademarks of PBI/Gordon Corporation.
- Postemergent Grass & Broadleaf Herbicide

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00709.20090323.proposed-highlighted.doc

2. **Reason for Issue:** To incorporate new MSMA requirements.