

2217-710

8/3/2001

1/6



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

AUG 3 2001

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: Conversion from MCPP to MCPP-p
Trimec LAF 637
EPA Registration Number: 2217-710
Your Submission Dated June 5, 2001

The Agency is conditionally approving an amendment to the registration for 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 for 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 Statements of Formula (CSFs) submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on our understanding that no changes have been made to product other than those specified within the body of your certification statement and cover letter dated June 5, 2001. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised CSFs (Basic and Alternate Formations dated June 1, 2001) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment.

2/6

-2-

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

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

Enclosure

3/6

TRIMEC® LAF 637 BROADLEAF HERBICIDE

FOR SALE TO, USE AND STORAGE BY PROFESSIONAL
TURF MAINTENANCE PERSONNEL ONLY

Controls Dandelion, Knotweed, Henbit, Chickweed, Plantain, Spurge and
many other broadleaf weeds, some of which are listed on this label.

One Gallon Covers Up To 3.5 Acres - Keep From Freezing

ACTIVE INGREDIENTS:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	41.08%
Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	6.95%
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid).....	1.67%

INERT INGREDIENTS:.....	50.30%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 3.28 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 34.12%
- 0.55 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 5.75%
- 0.13 lbs 3,6-dichloro-o-anisic acid equivalent per gallon or 1.39%
- Isomer Specific by AOAC Method.
- Contains single isomer form of Mecoprop-p.

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

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

AUG 3 2001

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
297-22**

KEEP OUT OF REACH OF CHILDREN

DANGER

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.

See side panel for additional Precautionary Statements

NET CONTENTS: _____ U.S. GALLONS

993/
EPA REG NO 2217-710 Amend
EPA EST NO 2217-KS-1
MANUFACTURED BY:





4/6
**READ THE ENTIRE LABEL FIRST. OBSERVE ALL 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. 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. Wear face shield or goggles when mixing, loading or applying this product. Harmful or fatal if swallowed.

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.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. 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 MCPP have been associated with mixing loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP 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

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 dust has settled.

STORAGE & DISPOSAL

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

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: *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. 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 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.

TRIMEC® LAF 637 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

ORNAMENTAL LAWNS AND TURF:

Apply Trimec® LAF 637 Broadleaf Herbicide at the rate of 2.3 to 4.0 pints per acre in sufficient water for adequate coverage. 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 at recommended rate. Do not use on dichondra and carpetgrass.

The maximum application rate to turf is 1.7 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.

APPLICATION TYPE AND DIRECTIONS:

Professional Lawn Maintenance - Use 2.3 to 2.7 pints of product per acre. Or use 0.84 to 1.0 fluid ounce of product per 1,000 square feet with spray volumes of 1.0 to 3.0 gallons per 1,000 square feet.

Use 2.5 to 3 pints of product per acre. Or use 0.92 to 1.1 fluid ounces of product per 1,000 square feet with spray volumes of 1.0 to 5.0 gallons per 1,000 square feet.

Mature Weeds - Use 3.25 to 4.0 pints of product per acre for controlling mature weeds.

Controlled Droplet Applicator - Reduced rates of Trimec® LAF 637 must be used when grass is stressed from heat, drought, etc. Do not use on warm season grasses. Add 2.0 pints Trimec® LAF 637 to the Herbi container then fill with 3.0 pints of water. Spray entire contents over 33,000 square feet (approx. ¾ acre). Do not overlap between spray patterns.

Turf Tamer Sprayers - Reduced rates of Trimec® LAF 637 must be used when grass is stressed from heat, drought, etc. Do not use on warm season grasses. Use 2.3 to 4.0 pints of product per acre (0.84 to 1.5 fluid ounces of product per 1,000 square feet) at spray volumes of 0.50 to 1.25 gallons per 1,000 square feet.

6/6

St. Augustinegrass - Apply Trimec® LAF 637 at 2.3 pints in up to 150 gallons of water per acre (1.2 fluid ounces of product in 5.0 gallons of water per 1,500 square feet). Do not spray St. Augustinegrass if grass is stressed from heat, drought, etc. Do not apply this product to St. Augustinegrass during spring green-up which is the transition period between dormancy and active growth. Cultivars vary in tolerance to this product. Do not apply this product to 'Floritam' St. Augustinegrass. Slight turf yellowing should disappear after about one week. See Note.

Bentgrass - On closely mowed bentgrass (putting and bowling greens) apply at a maximum rate of 1.0 fluid ounce of product in 5.0 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. See Note.

NOTE: Care should be taken to avoid overdosing bentgrass and St. Augustinegrass or injury may result. Large volumes of spray (i.e. 1.0 fluid ounce of product in 5 gallons 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 sprayer 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.

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.