

Mr. James A. Armbruster, Ph.D.
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 4090
Kansas City, Missouri 64101-1407

SEP 13 1995

Dear Dr. Armbruster:

SUBJECT: Label Amendments:

Trimec 869 (EPA Reg. No. 2217-720)
Trimec 870 Broadleaf Herbicide (EPA Reg. No. 2217-721)
Trimec 871 Herbicide Manufacturing Concentrate (EPA Reg. No. 2217-722)
Trimec M 886 Liquid Weed & Feed (EPA Reg. No. 2217-730)
Trimec M 887 Liquid Weed & Feed (EPA Reg. No. 2217-731)
Trimec M 891 Weed & Feed (EPA Reg. No. 2217-743)

Your Applications Dated August 23/24, 1995, to Amend
MCPA Product Labels to Comply with Various PR Notices
and the Label Review Manual.

The labeling referred to above, submitted in connection with
registration under the Federal Insecticide, Fungicide, and
Rodenticide Act, as amended, is acceptable provided changes are
made to the subject product labels, as specified below:

I. Trimec 869 (2217-720):

1. Revise the Hazards to Humans & Domestic Animals section to
read as follows:

"DANGER: Corrosive. Causes irreversible eye damage.
Harmful if swallowed, inhaled or absorbed through skin. Do
not get in eyes, on skin, or on clothing. Avoid breathing
spray mist. Wear long pants, long-sleeved shirt, shoes and
gloves when mixing, loading or applying this product. Wear
face shield or goggles when mixing loading or applying this
product. Wash thoroughly with soap and water after
handling. Remove contaminated clothing and wash clothing
before reuse."

RD:STANTON:PM Team 23:Rm. 235:305-5218:Disk #1:S493076.LET

CONCURRENCES

SYMBOL >	7505C							
SURNAME >	S. Stanton							
DATE >	Sep 12, 1995							

2. Delete the phrase "if irritation persists" from the dermal statement of practical treatment.
3. Revise the oral statement of practical treatment to read as follows:

"IF SWALLOWED: Call a physician or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."

EPA believes it is medically unadvisable to induce vomiting in cases where a pesticide product has been ingested, if the product is in Toxicity category I for eye irritation. Due to the corrosiveness of such products, there is a concern that additional tissue damage might occur during vomiting. Except in cases where the product also has a high acute oral toxicity, EPA believes the risk of additional damage outweighs the risk of toxicity from the ingested substance. Since Trimec 869 has a relatively low acute oral toxicity (Toxicity category III), vomiting should not be induced if the product is ingested.

4. Revise the first sentence of the Pesticide Disposal instructions to read "Pesticide wastes are acutely hazardous." This is the appropriate language for products in Toxicity category I for eye irritation, as specified in PR Notice 83-3.

II. Trimec 870 Broadleaf Herbicide (2217-721):

1. Revise the Hazards to Humans & Domestic Animals section to read as follows:

"DANGER: Corrosive. Causes irreversible eye damage. May be fatal if absorbed through skin. Harmful if swallowed or inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing spray mist. Wear long pants, long-sleeved shirt, shoes, gloves, and face shield or goggles when mixing, loading or handling this concentrated product. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash clothing before reuse."

2. Revise the dermal statement of practical treatment to read as follows: "Wash with plenty of soap and water. Get medical attention."

This statement should also be moved to a position above the oral and inhalation statements, since dermal toxicity is of greater concern than oral or inhalation toxicity in this case.

3. For the reasons discussed in I.3 above, revise the oral statement of practical treatment to read as follows:

"IF SWALLOWED: Call a physician or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."

4. Revise the first sentence of the Pesticide Disposal instructions to read "Pesticide wastes are acutely hazardous." This is the appropriate language for products in Toxicity category I for eye irritation, as specified in PR Notice 83-3.

III. Trimec 871 Herbicide Manufacturing Concentrate (2217-722):

1. Revise the Hazards to Humans & Domestic Animals section to read as follows:

"DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."

2. For the reasons discussed in I.3 above, revise the oral statement of practical treatment to read as follows:

"IF SWALLOWED: Call a physician or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."

3. Revise the Pesticide Disposal instructions to read as follows:

"Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. 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."

This is the appropriate language for products in Toxicity category I for eye irritation, as specified in PR Notice 83-3.

IV. Trimec M 886 Liquid Weed & Feed (2217-730):

1. Revise the Hazards to Humans & Domestic Animals section to read as follows:

"CAUTION: Causes eye irritation. Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wear long pants, long-sleeved shirt and shoes when applying this product. Wear goggles when applying this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."

2. Delete the phrase "if irritation persists" from the dermal statement of practical treatment.
3. Insert the following sentence at the beginning of the OTHER USE PRECAUTIONS section as on the previously accepted product label: "Do not apply this product through any type of irrigation system."

V. Trimec M 887 Liquid Weed & Feed (2217-731):

1. Revise the Hazards to Humans & Domestic Animals section to read as follows:

"CAUTION: Causes eye irritation. Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wear long pants, long-sleeved shirt and shoes when applying this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."

2. Delete the phrase "if irritation persists" from the dermal statement of practical treatment.
3. Insert the following sentence at the beginning of the OTHER USE PRECAUTIONS section as on the previously accepted product label: "Do not apply this product through any type of irrigation system."

VI. Trimec M 891 Weed & Feed (2217-743):

1. Revise the Hazards to Humans & Domestic Animals section to read as follows:

"CAUTION: Causes eye irritation. Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear long pants, long-sleeved shirt and shoes when applying this product. Wash

thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."

2. Delete the phrase "if irritation persists" from the dermal statement of practical treatment.

Stamped copies of the subject labels are enclosed for your records. Please submit (one) final printed copy for each of the above mentioned labels before releasing the products for shipment.

Sincerely yours,

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

Enclosures

TRIMEC® 869

A TRIMEC® ORNAMENTAL TURF HERBICIDE FORMULATION

Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge
and many other broadleaf weeds, some of which are shown on the side panel.

— KEEP FROM FREEZING —

ACTIVE INGREDIENTS:

* Dimethylamine Salt of 2-(2-methyl-4-chlorophenoxy) propionic acid.....	34.73%
** Dimethylamine Salt of 2-methyl-4-chlorophenoxyacetic acid.....	19.07%
*** Dimethylamine Salt of Dicamba: 3,6-dichloro-o-anisic acid.....	3.85%

INERT INGREDIENTS.....	42.35%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

*2.73 lbs. 2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 28.70%.

**1.48 lbs. 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 15.57%.

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

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

KEEP OUT OF REACH OF CHILDREN

DANGER

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

NET CONTENTS 55 U.S. GALLONS

760/ APXXXXXX
EPA REG NO 2217-720
EPA EST NO 2217-KS-1
Mfd. by PBI/GORDON CORPORATION
KANSAS CITY, MISSOURI 64101

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 13 1995

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

2217-720

EPA Reg. No. 2217-720.

7049

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

PRECAUTIONARY STATEMENT

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes damage to eyes. Do not get into eyes, on skin, or on clothing. Wear long pants, long-sleeved shirt, shoes and gloves when mixing, loading or applying this product. Wear face shield or goggles when mixing, loading or applying this product. Harmful if swallowed or inhaled. Avoid exposure to spray mist. Wash thoroughly after handling.

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 promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol. 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.

~~NOTE TO PHYSICIAN:~~ Probable mucosal damage may contraindicate the use of gastric lavage.

Statement of Practical Treatment

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards: Drift or run-off may adversely affect 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 washwaters or rinsate. 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 away from target area.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPP and MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPP and MCPA pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and 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 reenter or permit workers to reenter treated areas until sprays have dried or dusts have settled.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

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 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 can not 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 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. 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.

OTHER USE PRECAUTIONS - OBSERVE CAREFULLY.

1. Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants.
2. Do not pour spray solutions near these plants.
3. Do not use on lippia or dichondra nor on lawns or turf where desirable clovers are present.
4. Use only lawn-type sprayers.
5. NOTE: Coarse sprays are less likely to wind drift.
6. Do not spray exposed roots of trees and ornamentals. Do not exceed specified dosages for any area. Be particularly careful within the dripline of trees and other ornamental species.
7. Do not spray bermudagrass or zoysiagrass while emerging from dormancy, unless injury can be tolerated.
8. Applications to newly seeded lawns may cause injury. Delay application until well established, or after two or three mowings.
9. Applications should be made when air temperature is below 85°F to avoid injury to desirable grasses.
10. Seed can be sown 3 to 4 weeks after application.
11. Do not contaminate domestic or irrigation waters.
12. Be careful not to overdose centipedegrass or St. Augustinegrass.
13. After using this product, clean sprayer with soap or detergent and water, and rinse thoroughly before applying other pesticides.
14. Failure to observe the above precautions may result in injury to desirable plants.
15. Do not apply this product through any type of irrigation system.

- HOW MUCH TO USE & WHERE -

Bermudagrass and Bentgrass - Use 2 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.

Bluegrass, Fescue and Zoysiagrass - Use 3 to 4 pints of product per acre.

Centipedegrass and St. Augustinegrass - Use 1 to 1½ pints of product per acre. Repeat after 3 weeks if necessary. Do not overdose or apply during hot summer months. These species are sensitive. It is important to use great care in spraying.

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- GENERAL USE -

Mix TRIMEC® 869 in 20 to 240 gallons of water per acre for good coverage. 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 first mowing. Seed can be sown 3 to 4 weeks after application at recommended rates.

WEEDS CONTROLLED		
BEDSTRAW	KNOTWEED	SHEEP SORREL
BLACK MEDIC	LAMBSQUARTERS	SHEPHERDSPURSE
BUCKHORN	LESPEDeza	SPEEDWELL
BURDOCK	MALLOW	SPURGE
CHICORY	MORNINGGLORY	WILD CARROT
CHICKWEED	PEPPERGRASS	WILD GARLIC
CLOVER	PIGWEE	WILD ONION
DANDELION	PLANTAINS	YARROW
DOCK	POISON IVY	and other broadleaf
GROUND IVY	POISON OAK	weeds in lawns
HEALALL	PURSLANE	and turf.
HENBIT	RAGWEED	

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.