

2217-720

8/3/2001

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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 869
EPA Registration Number: 2217-720
Your Submission Dated May 18, 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 of 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 May 18, 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 May 18, 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.

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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

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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 (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	17.37%
Dimethylamine salt of 2-methyl-4-chlorophenoxyacetic acid.....	19.07%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid.....	3.85%
INERT INGREDIENTS.....	59.71%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

1.31 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 14.35%.

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

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

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.

2217-720

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

EPA REG NO 2217-720 Amend

EPA EST NO 2217-KS-1

MANUFACTURED BY:



KANSAS CITY, MO 64101



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

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PRECAUTIONARY STATEMENT

Hazards to Humans & Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled, or absorbed through skin. Do not get in eyes 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.

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 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.

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.

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

ENVIRONMENTAL HAZARDS:

Drift or runoff may adversely affect 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 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 acutely hazardous. 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.

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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 1¼ 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.

- 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	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	Plantains	Wild Onion
Ground Ivy	Poison Ivy	Yarrow and other broadleaf
Healall	Poison Oak	weeds in lawns and turf.

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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.