

2217-721

9/6/2001
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SEP - 6 2001

Mr. Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, Missouri 64101

Dear Mr. Martens:

SUBJECT: Conversion from MCPP to MCPP-p
Trimec 870
EPA Registration No. 2217-721
Your Submission Dated June 6, 2001

The Agency is conditionally approving an amendment to the registration of 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 forms [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 in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the basic Confidential Statement of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. 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 that previously approved labeling for 18 months from the date of this letter.

A stamped copy of the labeling is enclosed for your records. This labeling supersedes all previously accepted labels. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

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

Enclosure

CONCURRENCES								
SYMBOL ▶	7505C							
SURNAME ▶	Miller							
DATE	9/6/01							

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TRIMEC® 870 BROADLEAF HERBICIDE

Controls Dandelion, Chickweed, Knotweed, Plantain,
Henbit, Spurge and other broadleaf weeds.

For Sale To And Use By Professional Turf Maintenance Personnel,
Landscaping Or Commercial Applicators Only.

- KEEP FROM FREEZING -

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-methyl-4-chlorophenoxyacetic acid.....	34.47%
Dimethylamine Salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid....	8.18%
Dimethylamine Salt of Dicamba: 3,6-dichloro-o-anisic acid.....	3.76%
INERT INGREDIENTS.....	53.59%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 2.61 lbs. 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 28.14%.
- 0.62 lbs. (+)-(R)-2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 6.76%.
- 0.29 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 3.12%.
- Contains single isomer form of Mecoprop-p.

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.

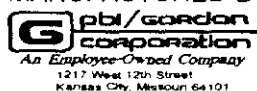
NET CONTENTS: U.S. GALLONS

770/

EPA REG NO 2217-721 Amend

EPA EST NO 2217-KS-1

MANUFACTURED BY:



ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP - 6 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-721



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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

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 before reuse.

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: 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 ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air and apply respiration if indicated.

NOTES 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 MCP and MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCP 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 area 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. To prevent cross-contamination, do not store near herbicides, fertilizers, insecticides, fungicides, or seeds.

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 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.



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 spray on carpetgrass, 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. Some injury can be expected to turf when used on centipedegrass or St. Augustinegrass lawns. Spot spray weeds only on these types of grasses. Clover present will be damaged if sprayed.
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.
16. After product has been diluted in accordance with Directions For Use below, face shield or goggles are not necessary.

ORNAMENTAL LAWNS & TURF (OTHER THAN BENTGRASS):

Apply at the rate of 3¼ to 4¼ pints in 20 to 240 gallons of water per acre. 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 apply to newly seeded turf until well established or after the second or third mowing. Grass seed can be sown 3 to 4 weeks after application at recommended rate. Do not broadcast apply to dichondra, carpetgrass and St. Augustinegrass or centipedegrass.

BENTGRASS TURF:

In closely-mowed bentgrass (putting and bowling greens) apply at a maximum rate of 1 fluid ounce of product per 1,500 square feet, preferably in May or mid-August through September. Slight turf yellowing will disappear after about one week.

NOTE: Care should be taken to avoid overdosing bentgrasses or injury may result. Large volumes of spray water (i.e. 1 fluid ounce in 5 gallons of water per 1,500 square feet) will aid in obtaining uniform coverage. If hand-type sprayers are used, it is preferable to use a single nozzle sprayer rather than a multiple nozzle boom as sideways application with a boom where the spray from more than one nozzle is allowed to fall on the same area will result in heavy local over application and subsequent turf discoloration or injury.

- 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 many other
Healall	Poison Oak	broadleaf weeds in lawns & 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.

Figure 1. The effect of the number of trials on the number of correct responses. The number of correct responses was significantly higher than the number of incorrect responses in all cases. The number of correct responses was significantly higher than the number of incorrect responses in all cases. The number of correct responses was significantly higher than the number of incorrect responses in all cases.