

09/13/1995

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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

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TRIMEC® 871

HERBICIDE MANUFACTURING CONCENTRATE

FOR FORMULATING USE ONLY.

FOR USE IN FORMULATING TRIMEC® HERBICIDES

NOT FOR RESALE.

ACTIVE INGREDIENTS:

2-methyl-4-chlorophenoxyacetic acid.....	45.59%
2-(2-methyl-4-chlorophenoxy)propionic acid.....	20.40%
Dicamba: 3,6-dichloro-o-anisic acid.....	4.30%
INERT INGREDIENTS.....	<u>29.71%</u>
TOTAL	100.00%

TRIMEC® is a 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 WEIGHT ___ POUNDS

APXXXXXX
EPA REG NO 2217-722
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.
2217-722**

EPA Reg. No. 2217-722

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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

~~**DANGER:** Corrosive, causes eye damage. Do not get in eyes, on skin or clothing. Wear goggles or face shield and rubber gloves when handling. If eye exposure occurs, get immediate medical attention. Harmful if swallowed. Wash thoroughly after handling.~~

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

Statement of Practical Treatment

~~**IF IN EYES:** In case of 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 ON SKIN:** Wash promptly with soap and water. Rinse thoroughly.~~

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

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

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

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

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

Environmental Hazards: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters, ~~unless this product is specifically identified and addressed in an NPDES permit.~~ unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Instructions must be followed in strict accordance with the manufacturer's recommendations for formulating use.

STORAGE & DISPOSAL

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

STORAGE: Store in original container. To prevent cross-contamination, do not store near other pesticides, fertilizers, food, feed, or seeds.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into formulation equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

ONLY FOR FORMULATING INTO A HERBICIDE FOR THE FOLLOWING USES:

1. TERRESTRIAL NONFOOD

- Ornamental lawns and turfgrasses established in institutional, ornamental, industrial and residential/domestic sites.
 - Noncropland (uncultivated agricultural areas, uncultivated nonagricultural areas, general soil treatments).
 - Recreational areas (golf courses, athletic fields, sport facilities).
 - Domestic outdoors (noncommercial homeowner use and commercial use).
2. Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
 3. Uses for experimental purposes that are in compliance with USEPA requirements.
 4. This product may be used to formulate product for specific uses not listed on the MP label if the formulator, user group, or grower has complied with USEPA data submission requirements regarding the support of such uses.

Formulators using this product are responsible for obtaining EPA registration for their formulated product.

MANUFACTURER TO FURNISH USER WITH COMPLETE DIRECTIONS
FOR USE IN ACCORDANCE WITH HIS FORMULATIONS.

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.