

2217-733

11/26/2001

Page 1 of 7



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 26 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 M904  
EPA Registration Number: 2217-733  
Your Submission Dated August 14, 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 August 14, 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.
3. EPA recently issued PR Notice 2001-1. Update the labeling in accordance with the guidance for the format and content of the First Aid Statements section on pesticide labeling. A copy of the PR Notice is available at the following web site:

[http://www.epa.gov/PR\\_Notices/](http://www.epa.gov/PR_Notices/)


-2-

A copy of the revised CSF (Basic Formation dated October 13, 2001) has been placed in the Agency's file for the subject product. This CSF supersedes 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

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

Sincerely yours,

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

Enclosure

3 8 7

# TRIMEC<sup>®</sup> M 904

"ST. AUGUSTINEGRASS" BROADLEAF HERBICIDE

**THIS HERBICIDE IS INTENDED ONLY FOR USE ON RESIDENTIAL  
LAWNS WITH APPLICATIONS BY HOMEOWNERS.**

**ACTIVE INGREDIENTS:**

Dimethylamine Salt of (+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid....	3.43%
Dimethylamine Salt of 2-methyl-4-chlorophenoxyacetic acid .....	3.77%
Dimethylamine Salt of Dicamba: 3,6-dichloro-o-anisic acid.....	0.76%

INERT INGREDIENTS:.....	92.04%
<b>TOTAL</b>	<b>100.00%</b>

**THIS PRODUCT CONTAINS:**

- 0.24 lbs. (+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid equipment per gallon or 2.84%
- 0.26 lbs 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 3.08%
- 0.05 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.63%

TRIMEC<sup>®</sup> is a registered trademark of PBI/GORDON CORPORATION.  
Contains the single isomer form of MCPP-p.

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

NOV 26 2001

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
2217-733

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See back panel for Precautionary Statements and First Aid.

**NET CONTENTS ONE U.S. GALLON**

706/ APxxxxxx  
EPA REG NO 2217-733 Amend  
EPA EST NO 2217-KS-1  
MANUFACTURED BY:



KANSAS CITY, MO 64101



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

## **PRECAUTIONARY STATEMENTS**

### **Hazards to Humans and Domestic Animals**

**CAUTION:** Causes moderate eye injury. Avoid contact with eyes, skin, or clothing. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist.

Wear long pants, long-sleeved shirt, shoes and gloves applying this product. Wear safety glasses when applying this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

### **Statement of Practical Treatment**

**IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.

**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.

## **ENVIRONMENTAL HAZARDS:**

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater. Do not apply when weather conditions favor drift away from target area. Do not contaminate domestic or irrigation waters.

## **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 others to reenter treated area until sprays have dried.

## **STORAGE & DISPOSAL**

**STORAGE:** Store in original container in a locked storage area. Keep from freezing.

**PESTICIDE DISPOSAL:** Securely wrap original container in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse container (bottle, can, jar). Rinse thoroughly before discarding in trash.

## **WHERE TO USE:**

Trimec® M 904 is intended for outdoor domestic use and may be applied to residential lawns, yards, playgrounds, and other areas associated with households. Cool season grasses include Kentucky bluegrass, bentgrass, fine fescues, and perennial ryegrass. Warm season grasses include bahiagrass, bermudagrass, buffalograss, centipedegrass, St. Augustinegrass, and zoysiagrass. Do not apply this product to dichondra, carpetgrass, or to lawns containing desirable clovers.

**APPLICATION SUGGESTIONS AND USE PRECAUTIONS:**

1. The best control will be obtained from spring or early fall applications when the broadleaf weeds are actively growing.
2. Hand pump sprayers, backpack sprayers, knapsack sprayers, and hose-end sprayers are suitable for broadcast applications. Hose end sprayers are not suitable for spot treatments. Do not spray vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour the spray solutions near these plants. Do not exceed the specified dosage for any area.
3. Do not spray on dichondra, carpetgrass, or lawns or turf with desirable clovers. Do not spray the exposed roots of trees and ornamentals. Use care within the dripline of trees and ornamental plantings.
4. Applications to newly sodded, sprigged, or plugged lawns of bermudagrass, centipedegrass, and St. Augustinegrass should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations. Applications to newly seeded lawns of common bermudagrass, Kentucky bluegrass, perennial ryegrass, and the fescues should be delayed until the third mowing.
5. Warm season grasses are sensitive to this product when emerging from or entering dormancy, and applications during this period should be avoided. Avoid applications when air temperatures exceed 85 - 90°F with high relative humidity. Cultivars vary in tolerance to this product; do not apply this product to 'Floritam' St. Augustinegrass in Florida.
6. Do not apply this product immediately before rainfall or irrigation. Do not irrigate or water the turfgrass within 24 hours after the application of this product.
7. Avoid applications of this product during periods of stress from drought, diseases, or insects.
8. Repeat or follow-up applications may be needed. If required, the interval between the first and second application should be 14 to 21 days.

**St. Augustinegrass, Bentgrass, and Buffalograss:**

**For Tank Sprayers** - Mix 1.0 fluid ounce or 2 tablespoons of product with 1.0 gallon of water to treat 300 square feet of lawn.

**For Hose End Sprayers** - Measure 3  $\frac{1}{3}$  fluid ounces or 6  $\frac{2}{3}$  tablespoons of product into the sprayer jar to treat 1,000 square feet of lawn. One quart of Trimec® M 904 will treat 9,700 square feet of turfgrass.

<b>Table 1.</b>				
<b>Lawn Grasses</b>	<b>Sprayer Type</b>	<b>Product to Measure</b>		<b>Area to Treat</b>
		<b>Fluid Ounces</b>	<b>Tablespoons</b>	<b>Square Feet</b>
St. Augustinegrass, Bentgrass, and Buffalograss	Tank type	1.0	2.0	300
	Hose end	3 $\frac{1}{3}$	6 $\frac{2}{3}$	1,000

**Bermudagrass, Bahiagrass, Kentucky Bluegrass, Centipedegrass, Fescue, Perennial Ryegrass, and Zoysiagrass:**

**For Tank Sprayers** - Mix 1½ to 2.0 fluid ounces or 3 to 4 tablespoons of product with 1.0 gallon of water to treat 300 square feet of lawn. Use the higher rate to control hard to control weeds, on older weeds, and during poor growing conditions.

**For Hose End Sprayers** - Measure 5.0 fluid ounces or 10 tablespoons of product into the sprayer jar/bottle to treat 1,000 square feet of lawn. One quart of Trimec® M 904 will treat 6,400 square feet of turfgrass.

**Table 2.**

Lawn Grasses	Sprayer Type	Product to Measure		Area to Treat
		Fluid Ounces	Tablespoons	Square Feet
Bahia grass, Bermudagrass, Kentucky Bluegrass, Fescues, Centipedegrass, Perennial Ryegrass, and Zoysiagrass	Tank type	1½ - 2.0	3.0 to 4.0	300
	Hose end	5.0	10	1,000

**- WEEDS CONTROLLED -**

Bedstraw	Healall	Ragweed
Black Medic	Henbit	Sheep Sorrel
Buckhorn	Knotweed	Shepherdspurse
Bull Thistle	Lambsquarters	Speedwell
Burdock	Lespedeza	Spurge
Buttercup	Mallow	Tansy Mustard
Chicory	Morningglory	Thistle
Chickweed	Mustard	Velvetleaf
Clover	Oxalis	Wild Carrot
Cocklebur	Peppergrass	Wild Garlic
Dandelion	Pigweed	Wild Lettuce
Dock	Plantain	Wild Onion
Galinsoga	Poison Ivy	Yarrow
Ground Ivy	Poison Oak	and other
Hawkweed	Purslane	broadleaf lawn weeds.

**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.

## APPENDIX

### *I. Advertising claims that may be used by supplemental registrants.*

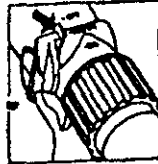
- ♦ Controls dandelion, chickweed, knotweed, plantain, henbit, spurge and many other broadleaf lawn weeds.
- ♦ One Quart Covers Up To \_\_\_\_\_ Square Feet.
- ♦ One Gallon Covers Up To \_\_\_\_\_ Square Feet.
- ♦ One Pint Covers Up To \_\_\_\_\_ Square Feet.

### (Optional Instructions For Use, Depending On The Hose-End Applicator Used.)

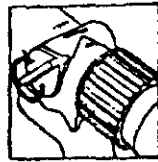
#### **OPTION 1 - HOSE-END DIRECTIONS.**



1. Attach garden hose to spray nozzle.



2. Bend safety tab down and turn control to "water".



3. Turn on water supply.



4. Point nozzle toward area/item to be sprayed and turn water control knob to "On". Product will automatically mix with water. Hold bottle level. Use with average water pressure.