

2217-734

9/19/2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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

SEP 19 2001

Dear Mr. Martens:

SUBJECT: Trimec® M 905 Lawn Weed Killer
EPA Registration No. 2217-734
Application and Letter Dated August 21, 2001, Request
To Amend Registration: Conversion To MCPPP-p, with
Fast Track Review with Revised Basic and Alternate
Formulations on EPA Form 8570-4, Confidential
Statements of Formula (CSF), Basic and Alternate
Formulations

The proposed amendment to the registration of the subject pesticide product is conditionally accepted under section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment this 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 is acceptable with the following provisions.

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement of Formula (CSFs) 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 this 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 previous accepted labeling. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

for Suzanne M. Wilson

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

Enclosure

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TRIMEC® M 905 LAWN WEED KILLER

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

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-methyl-4-chlorophenoxyacetic acid	9.43%
Dimethylamine Salt of (+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid.....	2.24%
Dimethylamine Salt of Dicamba: 3,6-dichloro-o-anisic acid.....	1.03%
INERT INGREDIENTS:.....	87.30%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.66 lbs 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 7.70%.
- 0.16 lbs (+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 1.85%.
- 0.07 lbs 3,6-dichloro-o-anisic acid equivalent per gallon or 0.85%
- Contains the single isomer form of Mecoprop-p.
- TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

**ACCEPTED
with COMMENTS
In EPA Letter Dated
SEP 19 2001**

KEEP OUT OF REACH OF CHILDREN

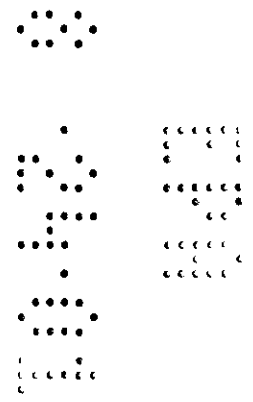
**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-734**

CAUTION

See back panel for Precautionary Statements and First Aid.

NET CONTENTS ONE QUART

707/ APxxxxxx
EPA REG NO 2217-734 Amend
EPA EST NO 2217-KS-1
MANUFACTURED BY:





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. Harmful if swallowed, or absorbed through the skin, or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

IF ON SKIN: Wash with plenty of soap and water. 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 IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

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 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.

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

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children. Do not store near food or feedstuffs. Avoid contamination of food or feedstuff.

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

CONTAINER DISPOSAL: Do not reuse container. Rinse thoroughly before discarding in trash.

USE PRECAUTIONS:

Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour spray solutions near desirable plants. Do not use on carpetgrass, dichondria, or on lawns or turf where desirable clovers are present. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area. Be particularly careful within dripline of trees and other ornamental species. Use only lawn type sprayers. Coarse sprays are less likely to drift from target area. This product may be injurious to St. Augustinegrass and centipedegrass under conditions of high temperatures (85°F) and drought. Do not apply this product to 'Floratam' St. Augustinegrass in Florida.

WHERE TO USE:

Trimec® M 905 Lawn Weed Killer may be used on Kentucky bluegrass, bentgrass, bermudagrass, bahiagrass, buffalograss, fescues, perennial ryegrass, zoysiagrass, St. Augustinegrass, and centipedegrass. Lawns, vacant lots, and playgrounds may be treated.

It is especially effective on all types of hard-to-kill weeds such as henbit, lespedeza, morningglory, poison

ivy and poison oak, spotted spurge and oxalis. In addition to these, Trimec® M 905 controls most other broadleaf lawn weeds including such sensitive species as black medic, chickweed, dandelion, and plantain. A partial list is given on the side panel.

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WHEN TO USE:

Spray at any time during the growing season when weeds are actively growing. Do not apply this product when air temperatures exceed 90°F. On new lawns, wait until the grass has been mowed three (3) times before making an overall spray treatment. Spot spraying may be made at any time with a pressure sprayer. Wait 3 weeks before putting new grass seed or stolons down in the bare spots. Poor weed control may result if spray is applied during drought or just before rain. For best results mow before treating. Do not water lawn within 24 hours after treatment.

FOR BERMUDAGRASS, BAHIAGRASS, KENTUCKY BLUEGRASS, FESCUES, AND PERENNIAL RYEGRASS:

Tank or Pressure Sprayers - Mix 1 - 1½ fluid ounces (2 - 3 tablespoons) of product with 1.0 gallon of water to cover 300 square feet of turf. Use the higher rate for large weeds or dense weed stands.

Hose End Sprayers - Put 3⅓ fluid ounces (6⅔ tablespoons) of product into the sprayer jar for every 1,000 square feet of turf. Fill the sprayer jar with water to the proper level and spray to cover 1,000 square feet of turf. For example, to spray 3,000 square feet of lawns, measure 10 fluid ounces (20 tablespoons) of product into the sprayer jar. Fill the jar with water to the 10 gallon mark and spray evenly to cover 3,000 square feet of lawn.

FOR ST. AUGUSTINEGRASS, BENTGRASS, BUFFALOGRASS, ZOYSIAGRASS, AND CENTIPEDEGRASS:

Tank or Pressure Sprayers - Mix ½ fluid ounce (1 teaspoon) of product with 1.0 gallon of water to cover 300 square feet of turf. If hard-to-control weeds persist repeat the application at the same rate in three (3) weeks.

Hose End Sprayers - Put 1⅔ fluid ounces (3⅓ tablespoons) of product into the sprayer jar for every 1,000 square feet of turf. Fill the sprayer jar with water to the proper level and spray to cover 1,000 square feet of turf. For example, to spray 3,000 square feet of lawns, measure 5 fluid ounces (10 tablespoons) of product into the sprayer jar. Fill the jar with water to the 10 gallon mark and spray evenly to cover 3,000 square feet of lawn.

TABULAR FORMAT FOR HOSE END SPRAYERS

Area to Treat, Square Feet	Fill bottle to, Gallons	Amount Trimec® M 905 Lawn Weed Killer, Fluid Ounces	
		St. Augustinegrass, Bentgrass, Buffalograss, Centipede grass, Zoysiagrass	Bermudagrass, Bahiagrass, Fescues, Kentucky Bluegrass, Perennial Ryegrass
300	1	½	1
600	2	1	2
1,500	5	2½	5
3,000	10	5	10

Spot Spraying - To spray small areas or individual weeds, do not use hose end sprayers. Mix 2 fluid ounces (4 tablespoons) in ½ gallon of water and spray as required being certain to wet each weed.

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CONTROLS:

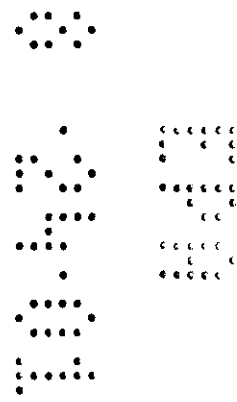
HARD-TO-KILL WEEDS		
Chicory	Mallow	Speedwell
Dock	Morningglory	Spurge
Ground Ivy	Pigweed	Wild Carrot
Healall	Poison Ivy	Wild Onion
Henbit	Poison Oak	Yarrow
Lespedeza		
SENSITIVE WEEDS		
Bedstraw	Dandelion	Purslane
Black Medic	Knotweed	Ragweed
Buckhorn	Lambsquarters	Shepherdspurse
Chickweed	Peppergrass	Wild Lettuce
Clover	Plantains	

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.



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APPENDIX

I. Advertising claims that may be presented on the retail containers of supplemental registrants:

- ◆ One quart covers up to _____ square feet.
- ◆ One pint covers up to _____ square feet.
- ◆ One gallon covers up to _____ square feet.
- ◆ Controls Dandelion, Knotweed, Henbit, Plantains, Spurge, Poison Ivy and many other broadleaf lawn weeds, some of which are shown on the side panel.
- ◆ Won't harm your lawn when used according to label directions.
- ◆ Kills broadleaf weeds down to the root without harming the lawn when used according to instructions.
- ◆ Water based formula.
- ◆ Eliminates over (XX number) broadleaf lawn weeds without harming lawn grasses.
- ◆ Kills weeds in bluegrass, fescue, ryegrass, bermudagrass, bahiagrass, bentgrass, centipedegrass, St. Augustinegrass, and zoysiagrass. Not for use on kikuyugrass, dichondra or carpetgrass.
- ◆ Kills over (XX number) weeds.
- ◆ Treats northern and southern grasses.
- ◆ Excellent for use in hand held tank and pump sprayers
- ◆ Covers up to 9,600 square feet.
- ◆ Contains MCPA, MCPP, and dicamba.
- ◆ Contains Trimec® herbicide.

II. Weed List:

- ◆ Controls (Number) weeds! (Listing of weeds may include the following.)

- WEEDS -		
Aster	False dandelion	Poison oak
Bedstraw	Frenchweed	Prickly lettuce
Bindweed	Galinsoga	Prostrate vervain
Black medic	Ground ivy	Puncturevine
Brassbuttons	Hairy fleabane	Purslane
Buckhorn	Hawkweed	Ragweed
Burdock	Healall	Red sorrel
Buttercup	Hemp	Rough cinquefoil
Chickweed, common	Henbit	Scarlet pimpernel
Chickweed, mouseear	Knotweed, prostrate	Shepherdspurse
Chicory	Lespedeza	Speedwell
Clover, crimson	Mallow	Spotted catsear
Clover, hop	Matchweed	Spurge, prostrate
Clover, red	Morningglory	Spurge, spotted
Clover, white	Oxalis	Tansy mustard
Cockle	Pennywort	Thistle
Cudweed	Peppergrass	Velvetleaf
Daisy, English	Pigweed	Virginia buttonweed
Daisy, oxeye	Pigweed, prostrate	Wild carrot
Dandelion	Plantain, blackseed	Wild garlic
Dock, broadleaf	Plantain, bracted	Wild lettuce
Dock, curly	Plantain, broadleaf	Wild onion
Dollarweed	Plantain, narrowleaf	Yarrow
Elderberry	Poison ivy	and many other broadleaf weeds

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III. Addition of advisory statements and nonpesticidal claims per PR Notice 95-2.

- ◆ Safer® Weed-Away (Product Brand Name) contains Safer's (Company Name)'s unique Weed-Marker™ (Colorant brand name) colorant. Treated areas will be marked by a green colorant, making areas sprayed clearly visible. Weed-Marker™ (Colorant brand name) helps avoid over application and allows immediate detection of overspray onto desirable plants: if overspray occurs, immediately rinse off exposed plant surface areas with water. The Weed-Marker™ (Colorant brand name) colorant breaks down quickly and will be immediately removed by watering or rains. NOTE: Some staining may occur if Weed-Marker™ (Colorant brand name) comes into contact with clothing or shoes. Shoes should be checked for staining after application so that the colorant will not transfer onto carpets. Remove contaminated clothing and wash clothing before reuse. The Weed-Marker™ (Colorant brand name) colorant can be removed by normal laundering.
- ◆ Contains Weed Marker™ Colorant. Details Inside.
- ◆ Concentrate!
- ◆ This container covers up to 19,200 square feet for warm season grasses.
- ◆ This container covers up to 9,700 square feet for cool season grasses.
- ◆ Always shake well before using.
- ◆ **Color 'em Green!**
- ◆ See where you've sprayed with Safer's Weed-Marker™ Colorant.
- ◆ Safer's Weed-Marker™ colorant helps you see where you have sprayed to prevent over application and misapplication.
- ◆ Safer's Weed-Marker™ colorant breaks down quickly when used in rain.
- ◆ Safer's Weed-Marker™ colorant can be removed from clothing and lawns with water.
- ◆ Safer's Weed-Marker™ colorant washes off lawns with soap and water.

