



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

January 17, 2024

Eric D. Smith
Director, Regulatory Affairs
PBI/Gordon Corporation
P.O. Box 860350
Shawnee, KS 66286

Subject: Label Amendment - Registration Review Mitigation for 2,4-DP-p and Mecoprop-p
Product Name: DMDP 897
EPA Registration Number: 2217-740
Application Dates: October 22, 2020, and January 8, 2021
Decision Numbers: 567174, 594736

Dear Eric D. Smith:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the 2,4-DP-p and Mecoprop-p Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with

40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

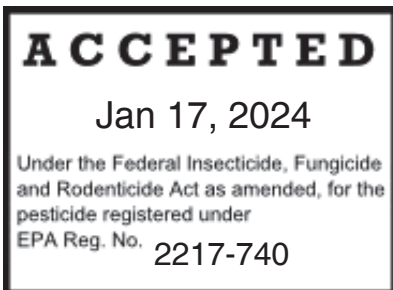
If you have any questions about this letter, please contact DeMariah Koger by phone at 202-566-2288, or via email at Koger.demariah@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a long horizontal flourish extending to the right.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label



2,4-D MCPP-p DICHLORPROP-P	GROUP	4	HERBICIDE
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DMDP 897

EPA Reg. No. 2217-740

ACTIVE INGREDIENT:

Dimethylamine Salt of 2,4-dichlorophenoxyacetic acid	16.3%
Dimethylamine Salt of (+)-R-2-(2 methyl-4-chlorophenoxy)propionic acid	8.2%
Dimethylamine Salt of (+)-R-2-(2,4-dichlorophenoxy)propionic acid	8.1%

INERT INGREDIENTS:	67.4%
TOTAL	100.0%

THIS PRODUCT CONTAINS:

- 1.2 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 13.6%
- 0.6 lb (+)-R-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 6.8%
- 0.6 lb (+)-R-2-(2,4-dichlorophenoxy)propionic acid equivalent per gallon or 6.8%

Isomer Specific by AOAC Methods.

KEEP OUT OF REACH OF CHILDREN

DANGER

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Do not get in eyes, on skin, or on clothing. A void breathing spray mist or vapor.

Personal Protective Equipment (PPE)

All mixers, loaders, applicators and other handlers must wear:

- protective eyewear (goggles, face shield, or safety glasses),
- long-sleeved shirt and long pants,
- shoes and socks,
- chemical-resistant gloves made of any waterproof material and,
- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate

User Safety Requirements:

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing

and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or on clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 - 20 minutes.• Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

Groundwater Advisory: These chemicals (2,4-D, MCP-p and 2,4-DP-p) have properties and characteristics associated with chemicals detected in groundwater. 2,4-DP-p is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow. Application around a cistern or well may result in contamination of drinking water or groundwater.

Non-target Organism Advisory Statement: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

DIRECTIONS FOR USE

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

USE RESTRICTIONS:

- Do not enter or allow people (or pets) to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.
- Do not apply this product through any type of irrigation system.
- Do not use on warm season grasses, such as St. Augustinegrass, centipedegrass, dichondra, or on lawns and turf where desirable clovers are present.
- Do not exceed specified dosages for any area.
- Do not spray when air temperatures exceed 85°F.
- Seed can be sown 3 to 4 weeks after application.
- After using this product, clean sprayer thoroughly with soap or detergent and water and rinse thoroughly before applying other pesticides.
- Do not use this product on or near desirable plants, including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs, since injury may result.
- Aerial application is prohibited.

Weed Resistance Management

For resistance management, this product contains Group 4 herbicides. Any weed population may contain or develop plants naturally resistant to this product and other Group 4 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same area. Appropriate resistance management strategies should be followed.

To delay herbicide resistance take one or more of the following steps:

- Rotate the use of this product or other Group 4 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use, and that considers mechanical control methods, cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive varieties) and other management practices.
- Scout area prior to application to identify the weed species present and their growth stage to determine if the intended application will be effective.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide resistance-management and/or integrated weed-management recommendations for specific types of turf and weed biotypes.
- For further information or to report suspected resistance, call 877-800-5556.

WEEDS			
Black Medic	Ground Ivy	Poison Ivy	Wild Carrot
Buckhorn	Healall	Poison Oak	Wild Garlic
Burdock	Knotweed	Purslane	Wild Onion
Chicory	Lambsquarters	Ragweed	Wild Lettuce
Chickweed	Mallow	Red Clover	Yarrow
Clover	Morningglory	Red Sorrel	and other
Dandelion	Oxalis (Woodsorrel)	Speedwell	broadleaf weeds
Dock	Pigweed	Spurge	in lawns & turf.
English Daisy	Plantains	White Clover	

ORNAMENTAL LAWNS & TURF (OTHER THAN BENTGRASS):

Apply DMDP 897 at a rate of 3.0 pints per acre in sufficient water for good coverage (40 to 80 gallons of water per acre or 1.0 to 2.0 gallons of water per 1,000 square feet). 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 mow within two days before or after application.

Limitations on broadcast applications to ornamental turfgrass:

The maximum application rate is 3.0 pints per acre per application (0.45 lb 2,4-D ae, 0.23 lb MCP-P ae and 0.23 lb 2,4-DP-P ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 6.0 pints per acre (0.90 lb 2,4-D ae, 0.46 lb MCP-P ae and 0.46 lb 2,4-DP-P ae per acre per year).

Limitations on spot treatments for ornamental turfgrass:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 1.1 fl.oz. per 1,000 sq.ft. per application (0.23 lb 2,4-DP-P acid equivalent and 0.23 lb MCP-P acid equivalent per acre). The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

Controlled Droplet Applicator: Reduced rates of DMDP 897 must be used when grass is stressed from heat, drought, etc. Add 2.0 pints of DMDP 897 to the herbicide container then fill with 3 pints of water, keeping spray solution agitated. Spray entire contents over 33,000 square feet (about 0.75 acre). Do not overlap between spray patterns.

BENTGRASS TURF:

Apply DMDP 897 at a maximum rate of 0.5 fluid ounce per 1,000 square feet in spring or early fall when weeds are actively growing. Avoid overdosing bentgrass or injury may result. Increasing the spray volume to 3.0 gallons per 1,000 square feet will help avoid turf injury. Do not mow within two days before or after application.

Spray Drift

Ground Boom Applications:

- User must only apply with the release height recommended by the manufacturer, but no more than 4 feet above the ground or crop canopy.
- Applicators are required to use a medium or coarser droplet size (ASABE S572.3).
- Do not apply when wind speeds exceed 15 miles per hour at the application site.
- Do not apply during temperature inversions.

Boomless Ground Applications:

- Applicators are required to use a medium or coarser droplet size (ASABE S572.3) for all applications.
- Do not apply when wind speeds exceed 15 miles per hour at the application site.
- Do not apply during temperature inversions.

Spray Drift Advisories

THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT. BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL CONDITIONS.

This product contains 2,4-D ester as an active ingredient. 2,4-D ester may volatilize during conditions of low humidity and high temperatures. Do not apply during conditions of low humidity and high temperatures. Mist from spray drift may cause injury to sensitive plants. Avoid any drift conditions that would allow the product to contact desirable vegetation.

The interaction of equipment and weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Importance of droplet size

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Controlling Droplet Size – Ground Boom

Volume: Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed, consider using a nozzle with a higher flow rate.

Pressure: Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.

Spray Nozzle: Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

Boom Height – Ground Boom

For ground equipment, the boom should remain level with the crop and have minimal bounce.

Shielded Sprayers: Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

Temperature and Humidity: When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

Temperature Inversions: Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

Wind: Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS.

Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

Boomless Ground Applications: Setting nozzles at the lowest effective height will help to reduce the potential for spray drift.

Handheld Technology Applications: Take precautions to minimize spray drift.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in a locked storage area. 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. 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.

[For Plastic Containers – Nonrefillable with capacities equal to or less than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its

end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

[For Refillable Containers:]

CONTAINER HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Container cleaning: Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in *Washington Toxics Coalition, et.al. v. EPA*, C01-0132C, (W.D. WA). For further information, please refer to EPA Web Site: <http://www.epa.gov/espp>.

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: _____
- EPA Est. No. _____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- CONTAINS 2,4-D, MCPP-p AND 2,4-DP-p

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00740.20210311.amend-proposed-clean

2. Reason for Issue: EPA comments on changes associated with MCP-p and Dichlorprop-p Registration Review