



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

NOV 29 2001

Dear Mr. Martens:

SUBJECT: Trimec® 914 Ready-To-Use Brush Killer
EPA Registration No. 2217-746
Application and Letter Dated November 8, 2001, Request
To Amend Registration: Conversion To MCPP-p, with
Fast Track Review with Revised Basic Formulations on
EPA Form 8570-4, Confidential Statements of Formula
(CSF), Dated: November 6, 2001

The proposed amendments to the registration of the subject pesticide product are 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 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 in support of the conversion is acceptable with the following provisions, that you:

1. 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.
2. Revise the propose labeling to reflect the required "First Aid" statements, as stated in PR Notice 2001-1
3. Revise the proposed labeling to comply with the UCC articles (Sections 2-719 and 2-316) that apply to the the claims for limitation of remedy in the warranty statements. The commonly used language is: "Read the entire Directions for Use and Conditions of Sale and Warranty before using this product. If terms are not acceptable, return the unopened product container at once". A copy of articles is enclosed for your use.
4. This labeling supersedes all previous accepted labeling. Submit one (1) copy of your final printed labeling prior to your shipment of this product under the enclosed stamped label.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment under this labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

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The Confidential Statement of Formula (CSF) submitted on EPA Form 8570-4 (Rev.2-85) [Please use the up-dated Form in the future] and dated November 6, 2001 has been reviewed and found as an acceptable amendment to the registration of the subject pesticide product under FIFRA, as amended. A copy of this CSF has been filed in this Agency's record for this pesticide product.

Sincerely yours,

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

Enclosures (2)

3 7 8

TRIMEC[®] 914

READY-TO-USE BRUSH KILLER

Controls Poison Ivy, Poison Oak, Multiflora Rose, Wild Plum, and other species of brush and broadleaf weeds. See back panel for partial list.

ACTIVE INGREDIENTS:

Dimethylamine Salt of (+)-(R)-2-(2-methoxy-4-chlorophenoxy)propionic acid.....	0.21%
Dimethylamine Salt of 2,4-dichlorophenoxyacetic acid.....	0.40%
Dimethylamine Salt of dicamba: 3,6-dichloro-o-anisic acid.....	0.07%
INERT INGREDIENTS:.....	99.32%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.02 lbs. (+)-(R)-2-(2-methoxy-4-chlorophenoxy)propionic acid equivalent per gallon or 0.18%.
- 0.03 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 0.33%
- 0.01 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.06%

Isomer Specific by AOAC Methods.

Contains the single isomer form of Mecoprop-p.

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

NOV 29 2001

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-746**

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panels for additional Precautionary Statements.

SHAKE WELL - KEEP FROM FREEZING

NET CONTENTS: 24 FLUID OUNCES

AP

EPA REG. NO. 2217-746 Amend

EPA EST. NO. 2217-KS-1

MANUFACTURED BY:





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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with eyes, skin or clothing. Wear goggles when applying this product. When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

Statement of Practical Treatment

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

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

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, 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 washwater. Do not apply when weather conditions favor drift from target area.

DIRECTIONS FOR USE

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

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has 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: Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing. Avoid contamination of food or feedstuffs.

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:

- ◆ Do not allow spray to drift onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants since injury may result.
- ◆ Avoid fine mist sprays. Coarse spray droplets are less likely to drift and cause damage to nontarget plants.
- ◆ Do not spray roots of desirable trees and shrubs.

HOW TO USE:

Use Trimec® 914 Ready-To-Use Brush Killer for spot treating individual plants. For best control of the brush and broadleaf weeds listed on the label, spray each plant until it is wet.

This product may be applied to brush and broadleaf weeds around farm premises including:

- ♦ along fences, walkways, private roads, and driveways
- ♦ on vacant lots, yards, lawns and fringe areas
- ♦ around outbuildings, equipment parking areas, and farmyards

Also, this product may be applied in residential or suburban areas including:

- ♦ along fences, driveways, parking areas, and roads
- ♦ on vacant lots, yards, lawns and fringe areas
- ♦ around buildings, patios, houses, and areas associated with household or home life.

For best results, apply when brush and broadleaf weeds are actively growing. Do not water within 24 hours of application.

Be careful not to spray this product in a manner which will allow drift of the spray onto desirable broadleaf plants such as tomatoes, grapes, flowers, ornamental plantings, shrubs, and trees.

CONTROLS:

This product controls these species of brush, vines, and broadleaf weeds.

- BRUSH -		
Ash	Cottonwood	Multiflora Rose
Aspen	Dogwood	Oak
Birch	Elm	Poplar
Blackberry	Gooseberry	Pine
Black Cherry	Honey Locust	Spruce
Black Locust	Honeysuckle	Sycamore
Brambles	Kudzu	Wild Plum
Buckbrush	Maple	Willow
Cedar		
- BROADLEAF WEEDS -		
Bedstraw	Kochia	Ragweed
Bindweed	Knotweed	Sheep Sorrel
Black Medic	Lambsquarters	Shepherdspurse
Buckhorn	Lespedeza	Smartweed
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Mustard	Sunflower
Clover	Nettle	Thistles
Dandelion	Peppergrass	Velvetleaf
Dock	Pigweed	Wild Carrot
Ground Ivy	Plantains	Wild Garlic
Healall	Poison Ivy	Wild Lettuce
Henbit	Poison Oak	Wild Onion
Jimsonweed	Purslane	Yarrow

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 presented on the container labeling of supplemental registrants.

- ◆ Systemic Action Kills Woody Plants, Weeds, Vines & Brambles.
- ◆ Kills Poison Ivy, Poison Oak, Kudzu, Willow & Other Listed Woody Plants.
- ◆ Controls (Number) weeds! (Listing of weeds may include the following.)

♦ (Listing of weeds may include the following.)

- WEEDS -			
Annual yellow sweetclover	Cockle	Musk thistle	Spiny amaranth
Aster	Cocklebur	Mustard	Spiny cocklebur
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spiny sowthistle
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted catsear
Beggarticks	Cudweed	Nettle	Spotted spurge
Betony, Florida	Curly dock	Orange hawkweed	Spurweed
Bindweed, field	Daisy, English	Oriental cocklebur	Stinging nettle
Bird vetch	Daisy fleabane	Oxalis	Strawberry, India mock
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall nettle
Bittercress, hairy	Dandelion	Parsnip	Tall vervain
Bitterweed	Dichondra	Pearlwort	Tansy ragwort
Black-eyed Susan	Dogbane	Pennycress	Tansy mustard
Black medic	Dogfennel	Pennywort	Tanweed
Black mustard	Dollarweed	Peppergrass	Thistle
Blackseed plantain	Elderberry	Pepperweed	Trailing crownvetch
Blessed thistle	False dandelion	Pigweed	Tumble mustard
Bloodflower milkweed	False flax	Pineywoods bedstraw	Tumble pigweed
Blue lettuce	False sunflower	Plains coreopsis (tickseed)	Velvetleaf
Blue vervain	Fiddleneck	Plantain	Venice mallow
Bracted plantain	Florida pusley	Poison ivy	Virginia buttonweed
Brassbuttons	Frenchweed	Poison oak	Virginia creeper
Bristly oxtongue	Galinsoga	Pokeweed	Virginia pepperweed
Broadleaf dock	Goathead	Poorjoe	Water pennywort
Broadleaf plantain	Goldenrod	Prairie sunflower	Wavyleaf bullthistle
Broomweed	Ground ivy	Prickly lettuce	Western clematis
Buckhorn	Gumweed	Prickly sida	Western salsify
Buckhorn plantain	Hairy fleabane	Prostrate knotweed	White mustard
Bulbous buttercup	Hawkweed	Prostrate pigweed	Wild aster
Bull thistle	Healall	Prostrate spurge	Wild buckwheat
Bullnettle	Heartleaf drymary	Prostrate vervain	Wild carrot
Burclover	Heathaster	Puncturevine	Wild four-o'clock
Burdock	Hedge bindweed	Purslane, common	Wild garlic
Burning nettle	Hedge mustard	Ragweed	Wild geranium
Burweed	Hemp	Red sorrel	Wild lettuce
Buttercup	Henbit	Redroot pigweed	Wild marigold
Buttonweed	Hoary cress	Redstem filaree	Wild mustard
Canada thistle	Hoary plantain	Rough cinquefoil	Wild onion
Carolina geranium	Hoary vervain	Rough fleabane	Wild parsnip
Carpetweed	Horsenettle	Russian pigweed	Wild radish
Catchweed bedstraw	Jimsonweed	Russian thistle	Wild rape
Catnip	Knawel	Scarlet pimpernel	Wild strawberry
Catsear	Knotweed	Scotch thistle	Wild sweet potato
Chickweed, common	Kochia	Sheep sorrel	Wild vetch
Chickweed, mouseear	Lambsquarters	Shepherdspurse	Woodsorrel
Chicory	Lespedeza	Slender plantain	Woolly croton
Cinquefoil	Mallow	Smallflower galinsoga	Woolly morningglory
Clover, crimson	Matchweed	Smooth dock	Woolly plantain
Clover, hop	Mexicanweed	Smooth pigweed	Wormseed
Clover, red	Milk vetch	Sorrel	Yarrow
Clover, strawberry	Morningglory	Sowthistle	Yellow rocket
Clover, sweet	Mouseear hawkweed	Spanishneedles	Yellowflower pepperweed
Clover, white	Mugwort	Speedwell	and other broadleaf weeds