UNITED STATES ENVIRONMENTAL PROTECTION AGENCY PM 2 2217-758

05 NOV 1992

Dr. James A. Armbruster
1217 West 12th Street
P.O. Box 4090
Kansas City, Missouri 64101

Dear Dr. Armbruster:

Subject: Label Amendment - Oil diluents substituted for Water
Trimec 937 Herbicide
EPA Registration Number 2217-758
Your Submission Dated August 13, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following change:

- Under "Environmental Hazards" delete "or wetlands (swamps, bogs, marshes, and potholes)." and replace this with, "to areas where surface water is present or to intertidal areas below the mean high water mark."

A stamped copy of the label is enclosed for your records, please submit three (3) copies of final printed labeling with the correction above made.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

BEST AVAILABLE COPY

CONCURRENCES								
SYMBOL	H7505C							
SURNAME	Robbins							
DATE	11/5/92							

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

U.S. GPO 1985-467-851

AFTER TEXT

TRIMEC® 937 HERBICIDE

A Brush Killer & Broadleaf Weed Herbicide

[FOR BROADLEAF WEED CONTROL IN TURF]
[One Gallon Covers Up To 4 Acres. - 8 Ounces Covers Up to 11,000 Square Feet]

Controls Ash, Aspen, Brambles, Kudzu, Oak Willows, Dandelion, Chickweed, Knotweed, Plantains, Henbit, Spurge and many other species of brush and broadleaf weeds; some of which are listed on this label.

Rules OK'ed in Review by A.I. Acierto on 10/23/90

ACTIVE INGREDIENTS:	
*Isooctyl ester of 2,4-Dichlorophenoxyacetic acid	32.45%
**Isooctyl ester of 2-(2,4-Dichlorophenoxy) propionic acid	31.80%
***Dicamba: 3,6-dichloro-o-anisic acid.	5.38%
INERT INGREDIENTS	30.37%
TOTAL	100.00%

This product contains:
*2.0 lbs. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 21.54%
**2.0 lbs. 2-(2,4-Dichlorophenoxy) propionic acid equivalent per gallon or 21.54%
***0.5 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 5.38%

Isomer Specific by AOAC Method
TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

KEEP OUT OF REACH OF CHILDREN

WARNING

In case of contact in eyes, flush with water for 15 minutes and get immediate medical attention.
See next panel for Statement of Practical Treatment and additional Precautionary Statements.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

NET CONTENTS _____ U.S. GALLON

785,786/892 APXXXXXX
EPA REG. NO. 2217-758
EPA EST. NO. 2217-KS-1
Mfd. by PBI/GORDON CORPORATION
KANSAS CITY, MISSOURI 64101

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2217-758

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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes substantial but temporary eye injury. Wear goggles, face shield, or safety glasses when handling. When handling this product, wear chemical resistant gloves. Wash nondisposable gloves thoroughly with soap and water before removing. If spills occur, collect the material and dispose of by following disposal instructions on this label. Do not get in eyes, on skin or on clothing. If eye exposure occurs, flush with water and get immediate medical attention. Harmful if swallowed. Avoid breathing vapor. Wash contaminated clothing before reuse.

Statement of Practical Treatment

In case of contact in eyes, flush with water for 15 minutes and get medical attention. In case of contact with skin wash with plenty of soap and water.

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 or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply when weather conditions favor drift from target area. Do not contaminate domestic or irrigation waters.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and 2,4-DP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D and 2,4-DP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Physical or Chemical Hazard: Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

STORAGE & DISPOSAL

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets. To prevent cross-contamination, do not store near other pesticides, fertilizers, seeds, food, or feed.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. 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.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

NOT FOR USE ON SOD FARMS IN ARIZONA

ROADSIDES, DRAINAGE DITCHBANKS, RIGHTS-OF-WAYS, RAILROADS, FIRE-BREAKS, FORESTS, FENCE-ROWS, INDUSTRIAL SITES & OTHER SIMILAR NON-CROP AREAS

INSTRUCTIONS: To effectively control brush, all leaves, stems and suckers should be thoroughly wetted to the ground. Apply when plants come into full leaf (spring) until plants begin to go dormant. Best results are obtained when brush and broadleaf weeds are young and actively growing. Do not cut brush until the herbicide has translocated throughout the plant causing root death.

USE PRECAUTIONS: Do not apply this product through any type of irrigation system. Avoid spray drift to cotton, soybeans, tomatoes, tobacco, grapes, fruit trees, flowers, or garden crops and all other hormone herbicide-sensitive desirable plants. Do not apply near sensitive plants since small quantities of wind-drift herbicides may cause severe injury. Do not apply herbicide when wind speed is sufficient to cause drift. Do not apply herbicide when a temperature air inversion exists. An air inversion may be detected by creating a smoke column and observing a layering effect. Do not apply when temperature exceeds 85°F and humidity is high. To aid in avoiding spray drift, use coarse sprays and low pressure. Do not use nozzles which produce fine spray droplets under high pressure. The use of thickening agents or anti-drift additives and drift-reducing equipment are of value in preventing spray drift. Care should be taken not to make applications where runoff could carry the chemical to food crops or grazing lands where cattle, sheep, goats, swine or poultry would be exposed.

SPRAY PREPARATION AND TANK-MIXTURES

Water Spray: Add one-half the required amount of water to the spray tank, then add Trimec 937 Herbicide slowly with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

Full Oil Spray: Use diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or basal oils. Add one-half the required amount of oil to the spray tank, then add Trimec 937 Herbicide with agitation and complete filling the tank with oil. Mix thoroughly and provide adequate agitation during mixing and spraying.

Tank-Mixing with Garlon(R) 4 Herbicide: Trimec 937 Herbicide can be mixed with Garlon 4 Herbicide for use in forests, roadsides, rights-of-ways, railroads, fencerows, industrial sites and other similar non-crop areas. Garlon 4 Herbicide is a butoxyethylester formulation containing 4.0 pounds per gallon of the active ingredient triclopyr. A mixture of Trimec 937 Herbicide and Garlon 4 Herbicide should be used in accordance with the more restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Aerial applications of this tank-mixture can be made with helicopter only.

Three steps for tank-mixing with Garlon 4 Herbicide are suggested. First, add one-third of the required amount of diesel oil or water to the spray tank. Next, add the Trimec 937 Herbicide slowly with agitation, then add another one-third of the carrier to the tank. Finally add slowly the Garlon 4 Herbicide and the balance of the carrier. Do not mix the chemicals simultaneously and continue the agitation during each step.

High Volume: Mix 1/2 to 1 gallon of Trimec 937 Herbicide per 100 gallons of water and apply 100 to 300 gallons of spray per acre. The dosage rate and the spray volume depend upon the height and density of the brush and/or weeds. For small broadleaf weeds use the low dosage rate and the low spray volume. Heavy dense stands of brush require the high dosage rate and the high spray volume.

For small applications with small tank sprayers use at the rate of 1 to 1 1/2 fluid ounces of product per gallon of water.

Aerial Foliage Method: Mix 1/2 to 2 gallons of Trimec 937 Herbicide in enough water to make 15 to 25 gallons total spray mixture per acre. Use enough water to ensure uniform wetting of plants.

Site-Prep Forest Planting: Mix 1 to 2 gallons of Trimec 937 Herbicide with 10 to 20 gallons of water per acre to reduce competition from mixed trees and brush before planting forest tree seedlings. Do not apply as a stand release or cover spray to established plants as this spray mixture will damage conifers.

Basal Bark Method: Apply with low volume backpack sprayer or power equipment. Volume sprayed per acre will depend on method used and number of stems per acre. Use a coarse spray to avoid drift.

High Volume (Basal Bark) - For high volume applications, apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed.

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Label

Mix 3 to 5 gallons of Trimec 937 Herbicide with 95 to 97 gallons of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, or mineral oil). Spray volumes will depend up on the sizes, types, and densities of the species present.

Low Volume (Basal Bark) - For low volume applications, apply a uniform spray pattern to all sides of the stems and trunks up to a height of 18 to 24 inches. Treat the entire circumference of the tree.

Mix a full oil spray containing 33% Trimec 937 Herbicide, 10 to 20% surfactant, and 47 to 57% diesel oil. Suggested surfactants include Cide-Kick, Cide-Kick II, or other surfactants/penetrants appropriate for oil soluble herbicides. Substitutes for diesel oil as a diluent include the following basal oils: Androc Oil, Hy-Grade I, Arborchem Basal Oil, JLB Oil Plus, and other blends formulated for basal bark applications.

Cut Surface – Stump: This method can be used at any time of the year, but is more effective when applied as soon as possible after trees are cut. Spray the entire stump, particularly bark and exposed roots. Complete control requires a thorough drenching. Use this method after original or capital clearing. It is the primary step toward a chemical brush control program on newly cleared highways and rights-of-ways. Spray is most effective and economical on tree stumps with diameters larger than 3 to 4 inches.

Mix 1/2 to 1 gallon of Trimec 937 Herbicide with 25 gallons of diesel oil, basal oils, penetrant oils, or mineral oil. Apply to freshly cut tree stumps with a low volume knapsack sprayer using a cone nozzle. Spray thoroughly the cut surfaces, bark, and exposed roots. Treat the entire circumference of the tree. Drench until run-off to the soil surface is noticed.

For painting freshly cut stumps, mix 2 quarts of Trimec 937 Herbicide with 1.0 gallon of basal oil and thoroughly paint all surfaces of the stump.

Frill Treatment: This treatment is recommended for culling trees with trunk diameters greater than 5 to 6 inches. Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark, but do not remove chips.

Mix 3 to 4 gallons of Trimec 937 Herbicide in 100 gallons of diesel oil or mineral oil and treat freshly cut frills at any time of the year. Spray or pour the spray mixture into the frills without runoff.

BRUSH CONTROLLED:

Ash
Aspen
Birch
Blackberry
Black Cherry
Black Locust
Brambles
Buckbrush
Cedar
Cherry
Cottonwood
Dogwood
Elm
Gooseberry
Honey Locust
Honeysuckle
Kudzu
Maple
Multiflora Rose
Oak
Pine
Shortleaf Pine
Spruce
Sumac
Sycamore
Wild Plum
Willow

WEEDS CONTROLLED:

Bedstraw
Bindweed
Black Medic
Buckhorn
Burdock
Chicory
Chickweed
Clover
Cocklebur
Dandelion
Dock
Ground Ivy
Heal-all
Henbit
Jimsonweed
Knotweed
Kochia
Lambsquarter
Lespedeza
Mallow
Morningglory
Mustard
Nettle
Oxalis
Peppergrass
Pigweed
Plantains
Poison Ivy
Poison Oak
Purslane
Ragweed
Sheep Sorrel
Shepherdspurse
Smartweed
Speedwell
Spurge
Sunflower
Thistles
Trumpet Vine
Velvetleaf
Wild Carrot
Wild Garlic
Wild Lettuce
Wild Onion
Yarrow

ORNAMENTAL LAWNS & TURF (cool season grasses other than bentgrass)

(One Gallon Covers up to 4 Acres.)

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, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present. Use only lawn-type sprayers. Avoid fine sprays; coarse sprays are less likely to wind-drift. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other ornamental species. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 85 ° F. Seed can be safely sown 3 to 4 weeks after application. Care should be taken not to make applications where runoff could carry the chemical to food crops or grazing lands where cattle, sheep, goats, swine or poultry would be exposed.

INSTRUCTIONS:
Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing. Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

General Application: Apply at the rate of 2 to 3 pints in 20 to 260 gallons of water per acre (3/4 to 1.1 fluid ounces in 1 to 6 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

Controlled Droplet Applicator: Add 1 1/2 pints to the HERBI container and fill with water. Spray contents over 33,000 square feet. Avoid overlapping between spray patterns.

Small Area Applications: Not recommended for hose-end sprayers. Spray at any time during the growing season when weeds are actively growing. On new lawns -- wait until the grass has hardened off -- usually after it has been mowed at least three times. Poor weed control may result if spray is applied during drought or just before rain. Do not water within 24 hours after treatment.

SPRAY PREPARATIONS FOR PRESSURE SPRAYERS

Amount of Product		Gallons of Water	Area to Treat
Tablespoons	Fluid Ounces		Square Feet
1⅓	3/4	1	1000
3	1⅓	2	2000
4⅓	2¼	3	3000

Garlon(R) Herbicide is a registered trademark of DowElanco.
Cide-Kick and Cide-Kick II, JLB Oil Plus are products of JLB International Chemical Incorporated.
Arborchem Basal Oil is a product of Arborchem Products Co.
Hy-Grade I is a product of CWC Chemical, Inc.
Androc Oil is a product of _____.

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.