

2217-793

7/30/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 30 2002

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  
Gordon's Tri-Guard 20-10-5  
EPA Registration Number: 2217-793  
Your Submission Dated May 1, 2002

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 May 1, 2002. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop bearing the previously approved labeling for 18 months from the date of this letter.
3. Update the labeling to include the following corrections:
  - a. In the Environmental Hazards Section delete "For terrestrial uses,". Refer to PR Notice 93-8.
  - b. In the labeling wherever it occurs specify "MCPP-p".
  - c. Move "It is a violation....with its labeling" immediately below the heading Directions For Use. Under this heading delete "spray has dried or".

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d. Reinstate the Storage and Disposal Directions that appear on the last accepted label. The proposed text is appropriate for household use only. This product bears directions for commercial turf use. Refer to PR Notice 83-3. A copy is available at the following web site:

[http://www.epa.gov/opppmsd1/PR\\_Notices/pr83-3.html](http://www.epa.gov/opppmsd1/PR_Notices/pr83-3.html)

A copy of the revised CSF (Basic Formulation dated April 3, 2002) 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,

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

Enclosure

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# GORDON'S TRI-GUARD 20-10-5

Controls Dandelion, Chickweed, Knotweed, Plantain,  
Henbit, and other broadleaf weeds.

**ACTIVE INGREDIENTS:**

2,4-dichlorophenoxyacetic acid .....	0.62%
(+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid.....	0.14%
Dicamba (3,6-dichloro-o-anisic acid).....	0.06%

INERT INGREDIENTS:.....	99.18%
TOTAL	100.00%

**THIS PRODUCT CONTAINS:**

- 12.4 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.
- 2.8 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per ton.
- 1.2 lbs. 3,6-dichloro-o-anisic acid equivalent per ton.

Contains the single isomer form of Mecoprop-p.  
 TRIMEC® is a registered trademark of PBI/Gordon Corporation.  
 Isomer Specific by AOAC Methods.

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

**Statement of Practical Treatment**

~~IF ON SKIN: Promptly and thoroughly wash hands and exposed skin with soap and water.~~  
~~FOR EYES: Flush with water for 15 minutes and get medical attention.~~

See back panel for additional Precautionary Statements.

**NET WEIGHT      POUNDS**

APxxxxxx  
 EPA REG. NO. 2217-793 Amend  
 EPA EST. NO. 2217-KS-1

**MANUFACTURED BY:**

**G pbi/gordon**  
**corporation**  
*An Employee-Owned Company*  
 1217 West 12th Street  
 Kansas City, Missouri 64101  
 Telephone 800-821-7925

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
 JUL 30 2002

**Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act,  
 as amended, for the pesticide  
 registered under EPA Reg. No.**  
2217-793



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

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if swallowed. Do not inhale dust. Do not allow contact with skin, eyes or clothing. When using this product, wear long-sleeved shirt, long pants, socks and shoes.

After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

**First Aid**

<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency, call toll free 1-877-800-5556.</p>	

**ENVIRONMENTAL HAZARDS:**

Drift or runoff may adversely affect nontarget plants. For terrestrial uses, do not apply directly to water, or 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. 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.

Most cases of groundwater contamination involving phenoxy herbicides such as MCP and 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCP and 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and 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.

**DIRECTIONS FOR USE**

For use on ornamental lawns and turf established in institutional, ornamental, and residential sites. Grass seed crops and sod farms uses are excluded. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

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 or dust has settled.

**STORAGE & DISPOSAL**

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

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**STORAGE:** Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals.

**PESTICIDE 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:** For Paper and Plastic Bags Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by State and local authorities by burning. If burned stay out of smoke.

**If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

**If partially filled:** Call your local solid waste agency or toll free number (1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

**WHERE TO USE:**

Gordon's Tri-Guard is a Trimec® brand herbicide containing fertilizer, 2,4-D, mecoprop, and dicamba. This granular weed and feed provides a balanced supply of plant nutrients and controls a broad spectrum of broadleaf weeds in turfgrass. Supplemental nitrogen, phosphorus, and potash should be applied according to soil tests or State Extension Service recommendations.

Gordon's Tri-Guard is intended to be applied by commercial applicators, noncommercial users, lawn care operators, and landscape personnel. Cool season and warm season grasses established in institutional, ornamental, and residential sites may be treated.

Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations; for example, hospitals, nursing homes, schools, museums, libraries, sport facilities (including golfcourses), and office buildings may be treated. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, and institutional buildings. Finally, residential sites are defined as areas associated with the household or home life including, but not limited to apartment complexes, condominiums, and patient care areas of nursing homes, mental institutions, hospitals, or convalescent homes.

Gordon's Tri-Guard may be applied to newly seeded cool season turfgrass. Applications are recommended only after the third mowing or after the grass seedlings have tillered and have developed an adequate secondary root system.

Gordon's Tri-Guard may be applied to newly established warm season turfgrass. Treatments should be delayed until 3 - 4 weeks after the sodding, sprigging, or plugging operations, and low application rates (1/2 of the recommendation for established turfgrass) are suggested.

A uniform broadcast distribution of product on the treated area is essential. Do not exceed the specified application rate for any area; use care in the application of this product within the dripline of trees, shrubs, and other ornamentals.

Do not use this product on dichondra, carpetgrass, St. Augustinegrass, closely-mowed bentgrass putting greens, or turf containing desirable clovers.

**WEEDS CONTROLLED:**

Dandelion, chickweed, plantain, and clover are controlled effectively with Gordon's Tri-Guard. A partial list of susceptible weeds is shown below:

Bedstraw	Dock	Pigweed
Black medic	Ground ivy	Plantain
Buckhorn	Healall	Purslane
Burdock	Henbit	Ragweed

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Chicory	Knotweed	Sheep sorrel
Chickweed	Lambsquarters	Shepherdspurse
Clover	Morningglory	Speedwell
Dandelion	Peppergrass	Thistle

**HOW MUCH TO APPLY:**

**For Kentucky Bluegrass, Fescue spp., Perennial Ryegrass, Bermudagrass, and Zoysiagrass:** Apply 132.0 to 158.4 pounds (lbs.) of Gordon's Tri-Guard per acre of established turfgrass. Or the equivalent application rates are 3.0 to 3.6 pounds of product per 1,000 square feet (sq. ft.) of turfgrass.

The maximum application rate to turf is 1.0 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

Sequential or follow-up applications may be required for dense infestations of perennial and biennial weeds. Also, adverse environmental conditions prior or after application may reduce the effectiveness. If required, the treatment interval between the first and second applications should be approximately 30 days.

Drop spreaders, rotary spreaders, and other granular equipment should be calibrated for accurate and uniform applications of this product. Calibrate the equipment by applying the product over a measured or known area and adjust the equipment according to the recommendations of the equipment manufacturer. Refer to the rate table for the appropriate bag sizes and the area to be treated.

**Note to Supplemental Registrants:** Select the appropriate bag size and present only the information provided for that bag size on your product labeling.

Bag Size, Lbs.	Desired Rate Per Acre, Lbs.	Desired Rate Per 1,000 Sq. Ft., Lbs.	Treated Area For This Bag Size	
			Acres	Sq. Ft.
15	132.0	3.0	-----	5,000
	140.5	3.2	-----	4,700
	158.4	3.6	-----	4,200
16	132.0	3.0	-----	5,300
	140.5	3.2	-----	5,000
	158.4	3.6	-----	4,400
17	132.0	3.0	-----	5,700
	140.5	3.2	-----	5,300
	158.4	3.6	-----	4,700
18	132.0	3.0	-----	6,000
	140.5	3.2	-----	5,600
	158.4	3.6	-----	5,000
20	132.0	3.0	-----	6,700
	140.5	3.2	-----	6,300
	158.4	3.6	-----	5,600
30	132.0	3.0	0.23	10,000
	140.5	3.2	0.22	9,400
	158.4	3.6	0.19	8,300
35	132.0	3.0	0.27	11,700
	140.5	3.2	0.25	10,900
	158.4	3.6	0.22	9,700
36	132.0	3.0	0.28	12,000
	140.5	3.2	0.26	11,300
	158.4	3.6	0.23	10,000
40	132.0	3.0	0.31	13,300
	140.5	3.2	0.29	12,500
	158.4	3.6	0.25	11,100
45	132.0	3.0	0.34	15,000
	140.5	3.2	0.32	14,100
	158.4	3.6	0.29	12,500
48	132.0	3.0	0.37	16,000
	140.5	3.2	0.34	15,000
	158.4	3.6	0.31	13,200
50	132.0	3.0	0.38	16,700
	140.5	3.2	0.36	15,600
	158.4	3.6	0.32	13,900
55	132.0	3.0	0.42	18,300
	140.5	3.2	0.39	17,200
	158.4	3.6	0.35	15,300
60	132.0	3.0	0.46	20,000
	140.5	3.2	0.43	18,800
	158.4	3.6	0.38	16,700

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**Optional:** Equipment settings of drop spreaders, rotary spreaders, and other granular applicators may be presented on the container labels as requested by supplemental registrants.

**APPLICATION SUGGESTIONS:**

1. Spring and fall applications are recommended for the best control. However, Gordon's Tri-Guard may be applied any time broadleaf weeds are present and actively growing.
2. Mow the turfgrass 2 to 3 days before application.
3. Water the turfgrass thoroughly (>½ inch) at least 1 to 2 days before application.
4. Schedule applications in the morning when dew is present. Or sprinkle or irrigate lightly (<¼ inch) before application to provide maximum control.
5. Rainfall or irrigation within 24 hours after application may reduce the effectiveness. Do not irrigate or water the turfgrass within 24 hours after application.

GUARANTEED ANALYSIS 20-10-5	
Total Nitrogen (N).....	20%
Water Insoluble Nitrogen (N).....	5%
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ).....	10%
Soluble Potash (K <sub>2</sub> O).....	5%

**Labeling Requirements:**

- All fertilizer products distributed in Washington at a minimum, must have the following labeling statement: *"This product has been registered with the Washington State Department of Agriculture. When applied as directed, this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product."*
- After July 1, 1999 the label must also state: *"Information received by the Washington State Department of Agriculture regarding the components in this product is available on the internet at <http://www.wa.gov/agr/>."*

**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. Previously Approved Fertilizer Grades:** Fertilizer grades with nutrient contents expressed as the percentages of N, P<sub>2</sub>O<sub>5</sub>, and K<sub>2</sub>O include the following:

12-4-4	20-10-5	23-3-3	27-3-5
16-2-0	21-3-5	23-3-4	28-3-7
18-4-8	21-5-7	23-3-5	30-3-5
19-3-12	22-3-4	25-3-5	33-3-5

The fertilizer grade guaranteed analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.

**II. Advertising Claims:** Advertising claims presented on the container (bag) that may or may not be used by supplemental registrants:

- ◆ Fifty pounds covers up to 16,700 square feet of turf.
- ◆ Twenty pounds covers up to 6,700 square feet.
- ◆ Provides excellent response to the fertilizer plus effective broadleaf weed control.
- ◆ Combines the advantages of fertilization plus a broad range of weed control.
- ◆ Provides controlled release nitrogen feeding from Poly-S™ Technology.

**III. Previously approved retail container package sizes include:** 15, 16, 17, 18, 20, 30, 35, 36, 40, 45, 48, 50, 55, and 60 pounds.