



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 2, 2018

Eric D. Smith  
Director, Regulatory Affairs  
PBI/Gordon Corporation  
P.O. Box 014090  
Kansas City, Missouri 64101

Subject: Label Amendment – Updating label, adding advertising statements, etc.  
Product Name: GORDON'S GRANULAR 33 1/2  
EPA Registration Number: 2217-794  
Application Date: September 29, 2017  
Decision Number: 534456

Dear Mr. Smith:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

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 18 months from the date of this letter. After 18 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.

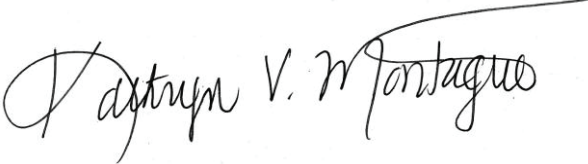
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2  
EPA Reg. No. 2217-794  
Decision No. 534456

with FIFRA section 6. If you have any questions, please contact Shanta Adeeb by phone at 703-347-0502, or via email at [adeeb.shanta@epa.gov](mailto:adeeb.shanta@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kathryn Montague, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# GORDON'S GRANULAR 33 $\frac{1}{2}$

## EPA Reg. No. 2217-794

**ACCEPTED**

11/02/2018

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 2217-794

### ACTIVE INGREDIENTS:

2,4-dichlorophenoxyacetic acid .....	0.76%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.17%
Dicamba: 3,6-dichloro-o-anisic acid .....	0.07%
OTHER INGREDIENTS .....	<u>99.00%</u>
TOTAL .....	100.00%

### THIS PRODUCT CONTAINS:

- 15.2 lb 2,4-dichlorophenoxyacetic acid equivalent per ton
  - 3.4 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton
  - 1.4 lb 3,6-dichloro-o-anisic acid equivalent per ton
- Isomer Specific by AOAC Methods.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

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

See attached booklet for complete [Precautionary Statements and] Directions for Use, including Storage and Disposal, and back panel for [complete Precautionary Statements, including] First Aid. OR See back panel for complete Precautionary Statements, including First Aid, and Directions for Use, including Storage and Disposal.

**Net Contents:** \_\_\_\_\_

**EPA Est. No.** \_\_\_\_\_

**Company Name and Address:**

PBI/Gordon Corporation  
1217 West 12<sup>th</sup> Street  
Kansas City, Missouri 64101



# **PRECAUTIONARY STATEMENTS**

## **Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

## **Personal Protective Equipment (PPE)**

Some materials that are chemical-resistant to this product are natural rubber.

All loaders, applicators, and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks,
- waterproof gloves

## **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.

### **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**

<b>If on skin or on 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 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>
<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 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>
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 information.	

## **Environmental Hazards**

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. 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.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

### **[Environmental Hazards (alternate per PRN 2008-1)**

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.]

## **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 dusts have settled.
- 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.
- For use on ornamental lawns and turf established in institutional, ornamental, and residential sites.
- Grass seed crops and sod farm 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.

### **WHERE TO USE:**

Gordon's Granular 33½ is a Trimec® herbicide containing fertilizer, 2,4-D, mecoprop-p, and dicamba. This granular weed and feed provides plant nutrients and controls a broad spectrum of listed broadleaf weeds in turfgrass. Supplemental nitrogen, phosphorus, and potash should be applied according to soil tests or State Extension Service recommendations.

Gordon's Granular 33½ is intended to be applied by noncommercial users, lawn care operators, and landscape personnel. Cool 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 areas around hospitals, nursing homes, schools, museums, libraries, sport facilities (including golf courses), 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 Granular 33½ 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.

A uniform broadcast distribution of product on the treated area is essential. Do not exceed the specified application rate for any area. Do not use this product on or near desirable plants, and avoid spreading granules onto exposed root systems or adventitious shoots (rhizomes) within the drip line of desirable trees and shrubs, since injury may result.

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 Granular 33½. A list of susceptible weeds is shown below:

Bedstraw	Clover	Knotweed	Purslane
Black medic	Dandelion	Lambsquarters	Ragweed
Buckhorn	Dock	Morningglory	Sheep sorrel
Burdock	Ground ivy	Peppergrass	Shepherd's purse
Chicory	Healall	Pigweed	Speedwell
Chickweed	Henbit	Plantain	Thistle

**HOW MUCH TO APPLY:**

Apply 140.5 to 158.4 pounds (lb) of Gordon's Granular 33½ per acre of established turfgrass. Or the equivalent application rate is 3.23 to 3.64 pounds of product per 1,000 square feet (sq.ft.) of turfgrass.

The maximum broadcast application rate is 3.64 pounds of product per 1,000 sq.ft. per application [1.2 lb 2,4-D ae, 0.27 lb MCP-p ae and 0.11 lb dicamba 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 7.28 pounds of product per 1,000 sq.ft. [2.4 lb 2,4-D ae, 0.54 lb MCP-p ae and 0.22 lb dicamba ae per acre].

A sequential or follow-up application 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.

[Begin Optional Language]

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, Lb	Desired Rate Per Acre, Lb	Desired Rate Per 1,000 Sq. Ft., Lb	Treated Area For This Bag Size	
			Acres	Sq. Ft.
15	140.5	3.23	-----	4,600
	150.2	3.45	-----	4,300
	158.4	3.64	-----	4,100
16	140.5	3.23	-----	5,000
	150.2	3.45	-----	4,600
	158.4	3.64	-----	4,400

Bag Size, Lb	Desired Rate Per Acre, Lb	Desired Rate Per 1,000 Sq. Ft., Lb	Treated Area For This Bag Size	
			Acres	Sq. Ft.
17	140.5	3.23	-----	5,300
	150.2	3.45	-----	4,900
	158.4	3.64	-----	4,700
18	140.5	3.23	-----	5,600
	150.2	3.45	-----	5,200
	158.4	3.64	-----	4,900
20	140.5	3.23	-----	6,200
	150.2	3.45	-----	5,800
	158.4	3.64	-----	5,500
30	140.5	3.23	0.21	9,300
	150.2	3.45	0.20	8,700
	158.4	3.64	0.19	8,200
40	140.5	3.23	0.28	12,400
	150.2	3.45	0.27	11,600
	158.4	3.64	0.25	11,000
45	140.5	3.23	0.32	13,900
	150.2	3.45	0.30	13,000
	158.4	3.64	0.28	12,400
50	140.5	3.23	0.36	15,500
	150.2	3.45	0.33	14,500
	158.4	3.64	0.31	13,700

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

SUGGESTED SPREADER SETTINGS				
<i>These suggested spreader settings are not intended to replace calibration. Please calibrate your spreader before applying product.</i>				
40 lbs. covers 12,400 sq. ft. (0.28 acre) with 0.678 lbs. N/1,000 sq. ft. at the LOW RATE				
40 lbs. covers 11,000 sq. ft. (0.25 acre) with 0.764 lbs. N/1,000 sq. ft. at the HIGH RATE				
SPREADER	GROUND SPEED	WIDTH OF COVERAGE	SPREADER SETTINGS	
			LOW RATE 3.23 Lbs. per 1,000 Sq.Ft.	HIGH RATE 3.64 Lbs. per 1,000 Sq.Ft.
Andersons AccuPro 1000, AccuPro/SR-2000 (Cone 6)	3 mph	10	K	K 1/4
Scotts Rotaries R-8, R-8A (Cone 6)	3 mph	10	J	J 1/2
Andersons SS-2 Drop	3 mph	overlap wheels	4	4 1/4
Lely W Pattern	4.5 mph	18	3 III-B	3 1/2 III-B
Vicon (03 Series)	4.5 mph	28	23	25

Broadcast Spreaders: For best results, apply in a circular path starting on the outside and working toward the center overlapping slightly to insure complete coverage.

Drop Spreaders: Apply two strips across each end. Then apply along length of lawn, overlapping slightly and shutting off the spreader before each turn at edge of border strips.

[Note to Reviewer: The above spreader language was not added, but was moved forward from the appendix.]

[End Optional Language]

**APPLICATION SUGGESTIONS:**

1. Spring and fall applications are recommended for the best control. However, Gordon's Granular 33½ can 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 (>1/2 inch) at least 1 to 2 days before application.
4. Schedule applications in the morning when dew is present. Or sprinkle or irrigate lightly (<1/4 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.

## **STORAGE AND DISPOSAL**

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

**PESTICIDE 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. 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 HANDLING:** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or 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.

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

### Herbicide Benefit Claims:

- Small particle formulation for excellent weed control.
- Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, and other [listed] broadleaf weeds [as listed].

### Fertilizer Benefit Claims:

- Provides a controlled release nitrogen feeding from [Poly-S® Technology.] [methylene urea technology]
- Slow-release nitrogen promotes lusher, deep green growth for up to four months
- Higher nitrogen content for greater coverage

### General Marketing Claims:

- Previously approved retail container package sizes include: 15, 16, 17, 18, 20, 30, 40, 45, or 50 pounds.
- \_\_\_\_\_ pounds covers up to \_\_\_\_\_ square feet of turf.
- Practical Solutions for Turf Professionals
- XCU® is registered trademark of Agrium.
- Trimec® Herbicide is a registered trademark of PBI/Gordon Corporation
- Trimec Herbicide is a registered trademark of PBI/Gordon Corporation.
- Information concerning the raw materials composing this product can be obtained by writing to the Guarantor listed below and referring to the item number found on this container.
- Size Guide Number [SGN 220][logo]
- CONTAINS SCU (Sulfur Coated Urea)
- Manufactured in the U.S.A.
- www.pbigordon.com

## 2. State mandated fertilizer labeling requirements:

[Note to Supplemental Registrants: Please select the statements relevant to the areas of the country in which your specific product is registered and sold; if any of these statements are relevant to your labeling, please place in the Directions for Use under the heading “State Restrictions”]

GUARANTEED ANALYSIS XX-X-X	
Total Nitrogen (N) .....	XX%
x.x% ammoniacal nitrogen	
x.x% urea nitrogen*	
Available Phosphate (P2O5) .....	X%
Soluble Potash (K2O) .....	X%
Sulfur (S) .....	X%
x.x% free sulfur (S)	
Iron (Fe).....	X%
Derived from: polymer-coated sulfur-coated urea, urea, ammonium phosphate, potassium chloride. *A portion of the urea has been coated to provide x.x% coated slow-release nitrogen. This product and/or its manufacture is covered by one or more of the following U.S. patents and international counterparts thereof: US Patent Numbers: xxxxxx	

[Note: Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5 and K2O may include the following: 23-3-7 or x-x-x. The fertilizer grade analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.]

- California, Oregon, Washington: “[When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials.]Information regarding the contents and levels of metals in this product is available on the internet at <http://www.aapfco.org/metals.htm>”
- Florida: “Apply only to actively growing turf.”
- Florida: “Check with your local Cooperative Extension Agency to obtain specific information on local turf best management practices. Check with your county or city government to determine if there are local regulations for fertilizer use.
- Maryland: “This fertilizer contains phosphorus and may not be used on turf in the state of Maryland except when 1) Providing nutrients to specific soils and target vegetation as determined to be necessary in accordance with a soil test that was conducted by a laboratory identified under § 8-803.7 of the Agriculture Article, Annotated Code of Maryland, performed no more than 3 years before the application; 2) Establishing vegetation for the first time, such as after land disturbance, provided the application is conducted in accordance with the recommended application rates established by the State; or 3) Reestablishing or repairing a turf area.”
- New Jersey: “In the state of New Jersey, this product may be used only when 1) Providing nutrients to specific soils and target vegetation as determined to be necessary pursuant to a soil test conducted by a laboratory identified pursuant to subsection b. of section 6 of P.L.2010, c.112 (C.58:10A-66) and performed no more than three years before the application, and pursuant to the associated annual fertilizer recommendation issued by the New Jersey Agricultural Experiment Station at Rutgers, the State University; 2) Establishing vegetation for the first time, such as after land disturbance, provided the application is in accordance with the standards and requirements established under the “Soil Erosion and Sediment Control Act,” P.L.1975, c.251 (C.4:24-39 et seq.) and the rules and regulations adopted pursuant thereto; 3) Reestablishing or repairing a turf area; or 4) Delivering liquid or granular fertilizer under the soil surface, directly to the feeder roots.”
- New Hampshire: In the state of New Hampshire, this product may only be used on 1) Establishing new lawns, for repairing a lawn, for seeding, or for use when a soil test indicates a phosphorus deficiency.
- Virginia: “In the state of Virginia, this product may be used only on 1) Newly established turf areas from sod or seed during the first growing season; 2) Turf areas being repaired or renovated, and; 3) Turf areas where soil tests performed within the past three years indicate nutrient deficiency.”
- [Virginia, Florida, Maryland, others] **DO NOT APPLY NEAR WATER, STORM DRAINS, OR DRAINAGE DITCHES. DO NOT APPLY IF HEAVY RAIN IS EXPECTED. APPLY THIS PRODUCT ONLY TO YOUR LAWN/GARDEN. [AND SWEEP ANY PRODUCT THAT LANDS ON THE DRIVEWAY, SIDEWALK, OR STREET, BACK INTO YOUR LAWN/GARDEN.]** [Note to Supplemental Registrant: The bracketed part of this statement is not required for liquid products.]
- [For products containing Iron:] Keep this product off sidewalks, patios, driveways, etc. This fertilizer contains iron which will stain concrete and painted surfaces. If it comes in contact with concrete surface, sweep off immediately before flushing with water. If concrete is wet when contact occurs, staining may be impossible to prevent. Be careful when using rotary spreaders which scatter fertilizer beyond lawn edge and onto concrete.
- [Note to Supplemental Distributor: In Kentucky if the product supplies less than 1lb of Nitrogen per application, include the following:] A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing XX pounds of nitrogen per 1,000 square feet and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.”
- Note: Supplemental applications of lawn fertilizer may be needed to achieve a minimum 1 pound nitrogen per 1,000 sq.ft.

## **DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-00794.20181002.amend-proposed-clean

2. **Reason for Issue:** EPA Comments #1

<b>Internal Usage Notes</b>
Associated Container Label: Supplemental Distributors