

2217-795

12/29/2010

10f11



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

PBI/Gordon Corporation  
James L. Kunstman, Ph.D.  
1217 West 12<sup>th</sup> Street  
P.O. Box 014090  
Kansas City, MO 64101-0090

DEC 29 2010

Subject: Label Notification for Pesticide Registration Notice 2007-4  
Gordon's Triplex 24-4-8  
EPA Reg. No. 2217-795  
Application Dated: September 16, 2010

Dear Dr. Kunstman,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated September 16, 2010 for Gordon's Triplex 24-4-8 (EPA Reg. No. 2217-795). The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

NOTE: 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 FIFRA 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 §12(a)(1)(E). 40CFR §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.

If you have any questions, please call me directly at (703) 305-1243.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn V. Montague".

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

2011



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number <b>2217- 795</b>	2. EPA Product Manager <b>Kathryn V. Montague</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Gordon's Triplex 24-4-8</b>	PM# Product Manager—Team 23	
5. Name and Address of Applicant (Include ZIP Code) PBI/Gordon Corporation Post Office Box 014090 Kansas City, Missouri 64101 <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

**Notification of label change per PR Notice 2007-4.**

Please refer to cover letter for details and certification statement.

e-mail to [jkunstman@pbigordon.com](mailto:jkunstman@pbigordon.com) FAX: 816-421-2731

**Section - III**

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container <b>15, 16, 17,18, 20, 30, 35, 40, 45, 50, 55 and 60 pounds</b>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>James L. Kunstman, Ph.D.</b>	Title <b>Director of Regulatory Services</b>	Telephone No. (include Area Code) <b>816-460-6292</b>
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title <b>Director of Regulatory Services</b>	
4. Typed Name <b>James L. Kunstman, Ph.D.</b>	Date <b>September 16, 2010</b>	



1217 WEST 12TH STREET • P.O. BOX 014090  
KANSAS CITY, MISSOURI 64101-0090  
816-421-4070 • 1-800-821-7925  
FAX: 816-474-0462

September 16, 2010

Document Processing Desk (PRN)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
Attn: Kathryn V. Montague, PM -23

Dear Ms. Montague:

**Subject: Response to Pesticide Registration Notice (PRN) 2007-4, Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal: Standards for Pesticide Containers and Containment". Gordon's Triplex 24-4-8 (EPA Reg. No. 2217-795)**

**I. Labeling notification per Pesticide Registration Notice (PRN) 2007-4:**

1. We ask to revise the disposal instructions and to adopt the exact language of Pesticide Registration Notice (PRN) 2007-4, Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal: Standards for Pesticide Containers and Containment." One (1) copy of the annotated labeling is enclosed for your review. Please refer to page 5 of the draft labeling.
2. **Certification:** This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this amended labeling is not consistent with the terms of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Section 12 and 14 of FIFRA.

Multiple sets of dotted lines indicating the end of sections.



5011

NOTIFICATION

DEC 29 2010

# GORDON'S TRIPLEX 24-4-8

## EPA Reg. No. 2217-795

### ACTIVE INGREDIENT:

2,4-dichlorophenoxyacetic acid .....	0.69%
(+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid .....	0.15%
Dicamba: 3,6-dichloro-o-anisic acid .....	0.06%
INERT INGREDIENTS .....	99.10%
TOTAL .....	100.00%

### THIS PRODUCT CONTAINS:

- 13.8 lb 2,4-dichlorophenoxyacetic acid equivalent per ton
  - 3.0 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton
  - 1.2 lb 3,6-dichloro-o-anisic acid equivalent per ton
- Isomer Specific by AOAC Methods.  
TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

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

## 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.

### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are natural rubber. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All loaders, applicators, and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks,
- chemical-resistant 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.



Net Weight: 15 to 60 pounds  
EPA Est. No. 2217-KS-X

**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 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 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 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 call toll-free, 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.

**DIRECTIONS FOR USE**

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

**PRECAUTIONS AND 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.
- 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 Triplex is a Trimec® brand herbicide containing fertilizer, 2,4-D, mecoprop-p, and dicamba. This granular weed and feed provides 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 Triplex is intended to be applied by 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 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 Triplex may be applied to newly seeded cool season turfgrass. Applications are to be made only after the third mowing or after the grass seedlings have tillered and have developed an adequate secondary root system.

Gordon's Triplex may be applied to newly established warm season turfgrass. Treatments should be delayed until 3 to 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. 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 Triplex. A partial 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	Shepherdspurse
Chicory	Healall	Pigweed	Speedwell
Chickweed	Henbit	Plantain	Thistle

**HOW MUCH TO APPLY:**

**For Kentucky Bluegrass, Fescue spp., Perennial Ryegrass, Bermudagrass, and Zoysiagrass:**

Apply 140.5 to 174.2 pounds (lb) of Gordon's Triplex per acre of established turfgrass. Or the equivalent application rates are 3.2 to 4.0 pounds of product per 1,000 square feet (sq.ft.) of turfgrass.

The maximum broadcast application rate is 4.0 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 8.0 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 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	140.5	3.2	----	4,700
	158.4	3.6	----	4,200
	174.2	4.0	----	3,800
16	140.5	3.2	----	5,000
	158.4	3.6	----	4,400
	174.2	4.0	----	4,000
17	140.5	3.2	----	5,300
	158.4	3.6	----	4,700
	174.2	4.0	----	4,300
18	140.5	3.2	----	5,600
	158.4	3.6	----	5,000
	174.2	4.0	----	4,500
20	140.5	3.2	----	6,300
	158.4	3.6	----	5,600
	174.2	4.0	----	5,000
30	140.5	3.2	0.22	9,400
	158.4	3.6	0.19	8,300
	174.2	4.0	0.17	7,500
35	140.5	3.2	0.25	10,900
	158.4	3.6	0.22	9,700
	174.2	4.0	0.20	8,800
36	140.5	3.2	0.26	11,300
	158.4	3.6	0.23	10,000
	174.2	4.0	0.21	9,000
40	140.5	3.2	0.29	12,500
	158.4	3.6	0.29	11,100
	174.2	4.0	0.23	10,000
45	140.5	3.2	0.32	14,100
	158.4	3.6	0.29	12,500
	174.2	4.0	0.26	11,300
50	140.5	3.2	0.36	15,600
	158.4	3.6	0.32	13,900
	174.2	4.0	0.29	12,500
55	140.5	3.2	0.39	17,200
	158.4	3.6	0.35	15,300
	174.2	4.0	0.32	13,800
60	140.5	3.2	0.43	18,800
	158.4	3.6	0.38	16,700
	174.2	4.0	0.34	15,000

**Optional:**

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



90911

**APPLICATION SUGGESTIONS:**

1. Spring and fall applications are to be made for the best control. However, Gordon's Triplex 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.

GUARANTEED ANALYSIS 24-4-8	
Total Nitrogen (N) .....	24%
Water Insoluble Nitrogen (N) .....	5%
Available Phosphate (P2O5) .....	4%
Soluble Potash (K2O) .....	8%

**Fertilizer Labeling Requirements:**

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.xxxxx.com>.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage ~~or~~ 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:** ~~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-xxx-xxxx) for disposal instructions. Never place unused product down any indoor or outdoor drain.~~

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**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 Weight: \_\_\_\_\_
- EPA Est. No. \_\_\_\_\_

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

- **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:

10-6-4	16-6-9	20-10-0	22-7-7	24-5-10	26-4-6
12-5-5	18-3-5	20-10-5	22-10-10	25-3-3	28-3-3
12-4-4	18-4-8	21-5-7	23-3-3	25-3-5	28-3-7
15-5-10	19-5-9	21-3-5	23-7-7	25-3-8	30-3-5
16-2-3	20-4-6	22-3-6	24-3-6	26-3-3	30-3-10
16-3-5	20-4-8	22-6-6	24-4-8	26-3-5	30-4-8

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.

GUARANTEED ANALYSIS	
Total Nitrogen (N) .....	19%
5.6% Water Insoluble Nitrogen	
9.0% Ammoniacal nitrogen	
1.4% Urea Nitrogen*	
3.0% Water Soluble Organic Nitrogen*	
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ) .....	5%
Soluble Potash (K <sub>2</sub> O) .....	9%
Total Magnesium (MG) .....	1.0%
0.2% Water Soluble Magnesium (Mg)	
Total Sulfur (S) .....	8.0%
8.0% Combined Sulfur (S)	
Total Iron (Fe) .....	1.0%
0.1% Soluble Iron (Fe)	
Total Manganese (Mn) .....	0.5%
0.01% Water Soluble Manganese (Mn)	
*Contains 3.0% Slowly Available Nitrogen from Methylene Urea. Nutrient Sources: Urea, Methylene Urea, Ammonium Phosphate, Ammonium Sulfate, Sulfate of Potash, Dolomite, Sulfate of Potash, Magnesia, Iron Sulfate, Manganese Sulfate, Manganese Oxide.	
Chlorine (Cl) not more than.....	3.0%

- Previously approved retail container package sizes include: 15, 16, 17, 18, 20, 30, 35, 36, 40, 45, 50, 55, and 60 pounds.
- Fifty pounds covers up to 15,600 square feet of turf.
- Twenty pounds covers up to 6,300 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(TM) Technology.
- Homogeneous fertilizer granules for high quality turf.
- Slow release nitrogen for long lasting feeding without burning when applied as directed.

110911

- Continual root development for a thick lush lawn.
- This fertilizer contains iron which will stain concrete and painted surfaces.
- Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, and other broadleaf weeds.

## **DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-00795.20100916.notif-proposed-highlighted.doc

2. **Reason for Issue:** PRN 2007-4