

2217-806

7/30/2002

1/9



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUL 30 2002

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 Trimec DMA Herbicide + Turf Fertilizer  
EPA Registration Number: 2217- 806  
Your Application Dated August 17, 2001 and Received on April 24, 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 April 17, 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 delete "spray has dried or" under the heading "It is a violation....with its labeling".

A copy of the revised CSF (Basic Formulation dated August 17, 2001) 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.

2/9

-2-

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

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

Enclosure

3/9

# GORDON'S TRIMEC<sup>®</sup> DMA HERBICIDE + TURF FERTILIZER 20-10-5

Controls Dandelion, Chickweed, Knotweed, Plantain, Henbit, Spurge and other broadleaf weeds in St. Augustinegrass, Centipedegrass, Bahiagrass, Bermudagrass, Zoysiagrass, Kentucky Bluegrass, Perennial Ryegrass, Fescues, and Bentgrass.

### ACTIVE INGREDIENTS:

Dimethylamine salt of (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	0.32%
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid.....	0.18%
Dimethylamine salt of dicamba: 3,6-dichloro-o-anisic acid.....	0.08%
INERT INGREDIENTS.....	99.42%
TOTAL	100.00%

### THIS PRODUCT CONTAINS:

5.40 lbs. or 0.27% (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton.

3.00 lbs. or 0.15% 2,4-dichlorophenoxyacetic acid equivalent per ton.

1.40 lbs. or 0.07% 3,6-dichloro-o-anisic acid equivalent per ton.

Isomer Specific by AOAC Methods.

Contains the single isomer form of Mecoprop-p.

TRIMEC<sup>®</sup> is a registered trademark of PBI/GORDON CORPORATION

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

See back panel for additional Precautionary Statements.

**NET WEIGHT (15, 16, 17, 18, 20, 30, 40, 45, or 50) POUNDS**

APxxxxxx  
EPA REG. NO. 2217-806 Amend  
EPA EST. NO. 2217-KS-X

MANUFACTURED BY:



**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.

2217-806  
2217-806

4/9



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

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Causes eye irritation. Harmful if swallowed or if absorbed through the skin. Avoid contact with skin, eyes, or clothing. When using this product, wear long-sleeved shirt, long pants, gloves, 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. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</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>
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

**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 to areas where surface water is present, or to intertidal areas below the high water mark. Do not contaminate water when disposing of equipment washwater.

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

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.

**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 or dust has settled.

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 AND DISPOSAL**

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

**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.

#### **WHERE TO USE:**

Gordon's Trimec® DMA Herbicide + Turf Fertilizer contains the dimethylamine salts of 2,4-D, mecoprop, 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 Trimec® DMA Herbicide + Turf Fertilizer is intended to be applied by commercial applicators, noncommercial users, lawn care operators, and landscape personnel. Warm season and cool season grasses established in institutional, ornamental, and residential sites may be treated.

St. Augustinegrass, centipedegrass, bahiagrass, bermudagrass, zoysiagrass, Kentucky bluegrass, perennial ryegrass, fescues, and bentgrass may be treated with this product. Do not use this product on dichondra, carpetgrass, or lawns containing desirable clovers. Discoloration of St. Augustinegrass may occur during periods of high temperatures and high humidity.

Gordon's Trimec® DMA Herbicide + Turf Fertilizer 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.

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.

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

6/9

**WEEDS CONTROLLED:**

Dandelion, chickweed, plantain, and clover are controlled effectively with Gordon's Trimec® DMA Herbicide + Turf Fertilizer. A partial list of susceptible weeds is shown below:

Bedstraw	Lambsquarters	Ragweed
Black medic	Lespedeza	Sheep sorrel
Buckhorn	Mallow	Shepherdspurse
Chicory	Morningglory	Speedwell
Chickweed	Oxalis	Spurge
Clover	Peppergrass	Thistle
Dandelion	Pigweed	Wild carrot
Dock	Plantain	Wild garlic
Ground ivy	Poison ivy	Wild lettuce
Healall	Poison oak	Wild onion
Henbit	Purslane	Yarrow
Knotweed		

**HOW MUCH TO APPLY:**

Apply 132 to 163 pounds of Gordon's Trimec® DMA Herbicide + Turf Fertilizer per acre of established turfgrass. Or, the equivalent application rate is 3.0 to 3.75 pounds of product per 1,000 square feet of turfgrass.

The maximum application rate to turf is 0.25 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, Pounds	Desired Rate Per Acre, Pounds	Desired Rate Per 1,000 Sq.Ft., Pounds	Treated Area For This Bag Size	
			Acres	Sq. Ft.
15	132.0	3.00	-----	4,950
	140.5	3.25	-----	4,650
	158.4	3.64	-----	4,125
	163.3	3.76	-----	4,000
16	132.0	3.00	-----	5,280
	140.5	3.25	-----	4,960
	158.4	3.64	-----	4,400
	163.3	3.76	-----	4,270
17	132.0	3.00	-----	5,610
	140.5	3.25	-----	5,270
	158.4	3.64	-----	4,675
	163.3	3.76	-----	4,540
18	132.0	3.00	-----	5,940
	140.5	3.25	-----	5,580
	158.4	3.64	-----	4,950
	163.3	3.76	-----	4,800
20	132.0	3.00	-----	6,600
	140.5	3.20	-----	6,200
	158.4	3.64	-----	5,500
	163.3	3.76	-----	5,300
30	132.0	3.00	0.23	9,900
	140.5	3.25	0.21	9,300
	158.4	3.64	0.19	8,250
	163.3	3.76	0.18	8,000
40	132.0	3.00	0.30	13,200
	140.5	3.25	0.28	12,400
	158.4	3.64	0.25	11,000
	163.3	3.76	0.24	10,700
45	132.0	3.00	0.34	14,850
	140.5	3.25	0.32	13,950
	158.4	3.64	0.28	12,375
	163.3	3.76	0.28	12,000
50	132.0	3.00	0.38	16,500
	140.5	3.25	0.36	15,500
	158.4	3.64	0.32	13,750
	163.3	3.76	0.31	13,340

**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 Trimec<sup>®</sup> DMA Herbicide + Turf Fertilizer 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 (>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.

**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. 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 including the following:

10-6-4	20-10-5	25-4-6	26-3-6	27-4-6
15-5-7	22-3-3	25-4-8	26-4-4	28-3-3
16-7-7	22-3-6	25-5-5	26-4-6	30-3-3
19-3-6	24-4-8	26-3-3	27-3-3	31-3-8
19-6-8	25-3-3	26-3-5	27-3-6	32-4-8

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.

The guaranteed analysis of a 26-4-4 fertilizer grade is presented as follows:

<b>GUARANTEED ANALYSIS</b>	
Total nitrogen (N).....	26%
1.9% ammoniacal nitrogen	
24.1% urea nitrogen*	
Available phosphate (P <sub>2</sub> O <sub>5</sub> ).....	4%
Soluble potash (K <sub>2</sub> O).....	4%
Sulfur (S) (free).....	2%
Derived from: ammoniated phosphate, polymer-encapsulated sulfur-coated urea, urea, and muriate of potash.	
Chlorine not more than.....	4%
*Contains 4.0% slowly available nitrogen from polymer-encapsulated sulfur-coated urea.	

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

- ◆ \_\_\_\_\_ pounds covers up to \_\_\_\_\_ square feet of turf.