

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

January 9, 2018

Eric Smith
Director – Regulatory Affairs
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

Subject: Label Amendment

Product Name: Gordon's Trimec DMA Herbicide + Turf Fertilizer

EPA Registration Number: 2217-806 Application Date: August 11, 2017

Decision Number: 533619

Dear Mr. Smith:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 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 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 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

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with FIFRA section 6. If you have any questions, please contact Mindy Ondish by phone at 703-605-0723, or via email at <a href="mailto:ondish.mindy@epa.gov">ondish.mindy@epa.gov</a>.

Sincerely,

Kathryn Montague, Product Manager 23

Herbicide Branch

Registration Division (7505P) Office of Pesticide Programs

Enclosure

## ACCEPTED

01/09/2018

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 2217-806

MECOPROP-P 2,4-D	GROUP	4	HERBICIDE
DICAMBA			

# GORDON'S TRIMEC® DMA HERBICIDE + TURF FERTILIZER

## **EPA Reg. No. 2217-806**

ACTIVE	INGRED	IENTS:
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Dimethylamine salt of mecoprop-p: (+)-(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%
OTHER INGREDIENTS	99.42%
TOTAL	100.00%

#### THIS PRODUCT CONTAINS:

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

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

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

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.

See attached booklet [inside pages] for complete Precautionary Staincluding First Aid, and Storage and Disposal.  OR	atements and Directions for Use,
See back panel for complete Precautionary Statements, including Fincluding Storage and Disposal.	First Aid, and Directions for Use,
Guaranteed Analysis: See appendix for example.	
Net Contents: EPA Est. No	
Company Name and Address: PBI/Gordon Corporation 1217 West 12 <sup>th</sup> Street Kansas City, Missouri 64101	CORPORATION Employee-Owned

## PRECAUTIONARY STATEMENTS

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

**CAUTION:** Harmful if swallowed. Causes moderate eye irritation. Harmful if absorbed through the skin. Avoid contact with eyes, skin or clothing.

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

All loaders, applicators, and other handlers must wear:

- long-sleeved shirt and long pants,
- · shoes plus socks, and
- · 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	
If swallowed:	<ul> <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>
If on skin or clothing:	<ul> <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>
If in eyes:	<ul> <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>

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 may be 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.

#### **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.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

#### RESISTANCE MANAGEMENT

For resistance management, this product is a Group 4 herbicide. Any weed population may contain or develop plants naturally resistant to this product and other Group 4 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same area. Appropriate resistance management strategies should be followed.

To delay herbicide resistance take one or more of the following steps:

- Rotate the use of this product or other Group 4 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and
  uses historical information related to herbicide use, and that considers mechanical control
  methods, cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive
  varieties) and other management practices.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide resistancemanagement and/or integrated weed-management recommendations for specific types of turf and weed biotypes.
- For further information or to report suspected resistance, call 877-800-5556.

#### WHERE TO USE:

Gordon's Trimec® DMA Herbicide + Turf Fertilizer contains the dimethylamine salts of 2,4-D, mecopropp, 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 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. 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.

#### **WEEDS CONTROLLED:**

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

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

#### **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 lb of product per 1,000 sq.ft. of turfgrass.

The maximum broadcast application rate is 3.75 lb of product per 1,000 sq.ft. per application (0.25 lb 2,4-D ae, 0.44 lb MCPP-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 7.50 lb of product per 1,000 sq.ft. (0.50 lb 2,4-D ae, 0.88 lb MCPP-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 a second application is required, allow a minimum of 30 days between the first and second application.

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	Desired Rate Per	Desired Rate Per 1,000		Area For ag Size	Bag Size,	Desired Rate Per	Desired Rate Per 1,000 Sq.Ft., Pounds	Treated Area For This Bag Size	
Size, Pounds	Acre, Pounds	Sq.Ft., Pounds	Acres	Sq.Ft.	Pounds	Acre, Pounds		Acres	Sq.Ft.
15	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75	 	4,950 4,650 4,125 4,000	30	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75	0.23 0.21 0.19 0.18	9,900 9,300 8,250 8,000
16	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75	 	5,280 4,960 4,400 4,270	40	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75	0.30 0.28 0.25 0.24	13,200 12,400 11,000 10,700
17	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75		5,610 5,270 4,675 4,540	45	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75	0.34 0.32 0.28 0.28	14,850 13,950 12,375 12,000
18	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75		5,940 5,580 4,950 4,800	50	132.0 140.5 158.4 163.3	3.00 3.25 3.64 3.75	0.38 0.36 0.32 0.31	16,500 15,500 13,750 13,340
20	132.0 140.5 158.4 163.3	3.00 3.20 3.64 3.75		6,600 6,200 5,500 5,300					

#### [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 Timing**

- Spring and fall applications are recommended for the best control. However, Gordon's Trimec® 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 (>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. For best results, 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	d other marketing/sales promotional materials:
•	pounds covers up to square feet of turf
•	Coverage up to XXX sq.ft.
•	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.

#### 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 (P <sub>2</sub> O <sub>5</sub> )	X%
Soluble Potash (K <sub>2</sub> 0)	X%
Sulfur (S)	X%
x.x% free sulfur (S)	
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.
- [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."

## **DOCUMENT CONTROL INFORMATION**

- 1. Unique Label Identifier: 002217-00806.20171221.amend-proposed-clean
- **2. Reason for Issue:** EPA Comments #1 + Update referral statement and section headings, including Inert Ingredients to Other Ingredients, to maintain consistency within our market labels. Add advertising statements consistent with previously approved claims. Add state mandated fertilizer statements. Correct typographical errors.

#### **Internal Usage Notes**

Associated Container Label: Supplemental Distributors