

2217-870

12108/2008

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

8 DEC 2008

OFFICE OF  
PREVENTION, PESTICIDES  
AND  
TOXIC SUBSTANCES

PBI/Gordon Corporation  
1217 West 12<sup>th</sup> Street  
P.O. Box 014090  
Kansas City, Missouri 64101

Subject: EPA Reg. 2217-870 / MUP Code 243 / RED Label Amendment: 2,4-D

The labeling referred to above is in compliance with the 2,4-D RED and is amended under the RED provided that you:

- 1) Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
- 2) Please note: Final product reregistration can't be considered until after all active ingredients in this product are eligible for reregistration.
- 3) Per the acute toxicity review, revise the statement "Avoid contact with skin" under the Hazards to Humans and Domestic Animals section to read "Do not get on skin."
- 4) Add the following statements to the label:

Wettable powder formulations must be packaged in water-soluble packages.

Only for formulation into end-use products with directions for use that prohibit broadcast applications greater than 0.75 lb. ae MCPP-p/A.

Only for formulation into end-use products with directions for use that prohibit spot treatment applications greater than 1.2 lbs. ea MCPP-p/A.

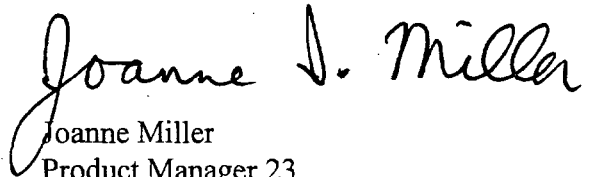
All ready-to-use spray containers must produce droplets that are medium or coarse in size according to ASAE standard 572 definition for standard nozzles."

- 5) Add the text "...and may adversely affect non-target plants" to the end of the first sentence under the Environmental Hazards section of the label.
- 6) To the Warranty section add "to the extent consistent with applicable law" in front of "the manufacturer neither makes".

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Submit one copy of the revised final printed label for the record. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Sincerely,



Joanne Miller  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

# MUP Code 243

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

8 DEC 2008

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

# EPA Reg. No. 2217-870

2217-870

## FOR USE IN THE MANUFACTURE OF HERBICIDES NOT FOR RESALE

### ACTIVE INGREDIENT:

2,4-D acid: 2,4-dichlorophenoxyacetic acid.....	45.50%
Mecoprop-p acid: (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid.....	11.20%
Dicamba acid: 3,6-dichloro-o-anisic acid.....	2.20%
INERT INGREDIENTS:.....	41.10%
TOTAL.....	100.00%

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

## KEEP OUT OF REACH OF CHILDREN

## DANGER

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

## PRECAUTIONARY STATEMENTS

### Hazards to Human and Domestic Animals

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled, or absorbed through the skin. Do not get in eyes or on clothing. When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical resistant gloves and eye protection. It is recommended that safety glasses include front, brow, and temple protection. Avoid breathing dust. Avoid contact with skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

First Aid	
If in eyes:	<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>
If on skin or clothing:	<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 the 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 mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further 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. You may also contact 1-877-800-5556 for emergency medical treatment advice.</p>	
<p><b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

**Environmental Hazards**

This chemical is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

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

Only for formulation into a herbicide for the following use(s):

- (1) TERRESTRIAL NONFOOD CROP AND CROPLAND AREAS.
  - a. **Ornamental turfgrass, lawn and turf grasses:** Outdoor domestic (residential) yards, cemeteries, parks.
  - b. **Uncultivated agricultural areas:** fence rows, rights-of-way.
  - c. **Uncultivated nonagricultural areas:** yards, lawn, turf, cemeteries, parks, airports, recreation areas (including golf courses), fairgrounds, roadsides, rights-of-way (highway, railroad and utility), industrial sites.
- (2) Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- (3) Uses for experimental purposes that are in compliance with USEPA requirements.
- (4) Formulators using this product are responsible for obtaining EPA registration for their formulated product.
- (5) This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).
- (6) MANUFACTURER TO FURNISH USER WITH COMPLETE DIRECTIONS FOR USE IN ACCORDANCE WITH HIS FORMULATIONS.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf (excluding sod farms) uses after June 15, 1994, must contain the revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993, must bear the revised label language below.

All products released for shipment on or after October 1, 2005 must bear revised labeling complying with the maximum application rates for general non-crop sites; tree, brush and woody plant control on rights-of-way; and forestry use patterns other than site preparation, if registered for such uses.

**GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING**

1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement:  
"Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."
2. Containers of 5 gallons or more in capacity must also bear the following statement: Do not open-pour product from this container. A mechanical system (such as probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal."

**SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING**

**1. FOR INDUSTRIAL and NON-CROP USES**

- a) Personal Hygiene Statements: "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product.. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."
- b) The maximum application rate to general non-crop sites is the lower of 1) existing application rate on currently registered label or 2) 2 pounds for 2,4-D acid equivalent per acre per application site. The maximum non-crop application for tree, brush and woody plant control on rights-of-way is the lower of 1) existing application rate on currently registered label or 2) 4 pounds of 2,4-D acid equivalent per acre per application site. The maximum seasonal application rate to non-crop sites is 4 pounds 2,4-D acid equivalent per acre per application site.

**2. FOR RESIDENTIAL AND TURF USES**

- a) Personal Hygiene Statements: (1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."; (2) For All Liquid Products: "After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower."
- b) The maximum application rate to turf is the lower of (1) existing application rate on currently registered label or 1.5 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.
- c) The following reentry statement must be included:

Entry Restrictions outside the scope of WPS.

Liquids:

General Precautions and Restrictions:

- Do not enter or allow people (or pets) to enter the treated area until sprays have dried.
- 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.

Granules:

General Precautions and Restrictions:

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.
- Do not allow people or pets to enter the treated area until dusts have settled.



