

2217-891

12/03/2008

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

3 DEC 2008

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

James Kuntsman
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 014090
Kansas City, Missouri 64101

Subject: EPA Reg. 2217-891 / EH1421 Herbicide (Response to Agency letter dated July 18, 2008)

Dear Mr. Kuntsman:

The labeling referred to above is acceptable.

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,

A handwritten signature in cursive script that reads "Joanne D. Miller".

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

EH-1421 HERBICIDE

EPA Reg. No. 2217-891

ACTIVE INGREDIENT:

Mecoprop-p, dimethylamine salt	3.91%
2,4-D, dimethylamine salt	4.23%
Dicamba, dimethylamine salt	0.87%
INERT INGREDIENTS:	90.99%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.28 lb. (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 3.23%
 - 0.30 lb. 2,4-Dichlorophenoxyacetic acid equivalent per gallon or 3.51%
 - 0.06 lb. 3,6-dichloro-o-anisic acid equivalent per gallon or 0.72%
- Isomer Specific by AOAC Method 6.DO1-5.
TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

ACCEPTED
3 - DEC 2008

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

2217-891

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: Causes moderate eye irritation. Wear protective eyewear. Harmful if swallowed or if absorbed through skin. Avoid contact with skin, eyes or clothing. 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.

First Aid	
If in eyes:	<ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.



If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<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>	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters 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.

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 sprays have dried.

WHERE TO USE

This product is intended for use on lawns including:

Cool Season Turfgrass	Warm Season Turfgrass
Kentucky bluegrass Perennial ryegrass Tall fescue Red or fine leaf fescues Colonial bentgrass Mixtures of cool season species	Common bermudagrass Hybrid bermudagrass Zoysiagrass Centipedegrass St. Augustinegrass Buffalograss

WHEN TO USE:

Spray at any time when weeds are growing. For best results, apply in spring when weeds are small and growing rapidly. Apply in the fall to control late germinating weeds.

Limitations on 2,4-D applications to residential turfgrass

The maximum application rate is 5.0 fl.oz. of product per 1,000 sq.ft. per application (0.51 lbs 2,4-D ae, 0.48 lb MCP-P ae and 0.10 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 10.0 fl.oz. of product per 1,000 sq.ft. (1.02 lbs 2,4-D ae, 0.95 lb MCP-P ae and 0.20 lb dicamba ae per acre).

HOW TO USE:

FOR ORTHO HOSE-END SPRAYERS OR GILMOUR® DIAL-A-MIX® LAWN AND GARDEN SPRAYER:

- **St. Augustinegrass and Centipedegrass:**
 1. Set the dial - Set dial on 1 Tablespoon (Tbs.) or 3 Teaspoons (tsp.) per gallon.

2. **Fill** - Determine [Measure] the lawn area to be sprayed. Calculate square feet of rectangular areas by multiplying length by width. The application rate for this product is 2 fl.oz. per 1,000 sq.ft. of lawn. Add an adequate amount of herbicide to the spray bottle to treat the total lawn area.
3. Example for 5,000 sq.ft. of lawn area: Measure 10 fl.oz. into sprayer jar. Do not add water. Set dial on 1 Tablespoon (Tbs.) or 3 Teaspoons (tsp.) and spray uniformly on 5,000 sq.ft. of lawn.
4. **Spray** - Spray evenly over the lawn.

• **Bermudagrass, Buffalograss and Bentgrass:**

1. **Set the dial** - Set dial on 2 Tablespoon (Tbs.) or 6 Teaspoons (tsp.) per gallon.
2. **Fill** - Determine [Measure] the lawn area to be sprayed. Calculate square feet of rectangular areas by multiplying length by width. The application rate for this product is 4 fl.oz. per 1,000 sq. ft. of lawn. Add an adequate amount of herbicide to the spray bottle to treat the total lawn area.
3. Example for 5,000 sq.ft. of lawn area: Measure 20 fl.oz. into sprayer jar. Do not add water. Set dial on 2 Tablespoons (Tbs.) or 6 Teaspoons (tsp.) and spray uniformly on 5,000 sq.ft. of lawn.
4. **Spray** - Spray evenly over the lawn.

• **Kentucky Bluegrass, Fescue, Perennial Ryegrass and Zoysiagrass:**

1. **Set the dial** - Set dial on 3 Tablespoon (Tbs.) or 9 Teaspoons (tsp.) per gallon.
2. **Fill** - Determine [Measure] the lawn area to be sprayed. Calculate square feet of rectangular areas by multiplying length by width. The application rate for this product is 5 fl.oz. per 1,000 sq. ft. of lawn. Add an adequate amount of herbicide to the spray bottle to treat the total lawn area.
3. Example for 5,000 sq.ft. of lawn area: Measure 25 fl.oz. into sprayer jar. Do not add water. Set dial on 3 Tablespoons (Tbs.) or 9 Teaspoons (tsp.) and spray uniformly on 5,000 sq.ft. of lawn.
4. **Spray** - Spray evenly over the lawn.

Spot Treatment with Pressure Sprayers:

Apply any time the emerged broadleaf weeds are susceptible. If necessary, repeat treatment in 30 days if hard-to-kill weeds persist.

Spray Preparation:

1. Fill sprayer with water to the proper level. Use 1 gallon of water for every 250 square feet to be sprayed.
2. Add the required amount of EH-1421 Herbicide listed in Table 1 for the type of grass to be treated
3. Adjust spray nozzle to deliver coarse spray. Spray uniformly. Minimize contact of grass.

St. Augustinegrass and Centipedegrass:

- Mix 1/2 fl. oz. (1 Tbs) in 1 gallon water and uniformly spray 250 sq.ft.
- Do not apply to St. Augustinegrass or centipedegrass emerging from winter dormancy; temperatures below 45°F within 72 hours of application may cause damage.
- Do not use on 'Floritam' St. Augustinegrass in Florida.

Bermudagrass, Buffalograss and Bentgrass:

- Mix 1 fl.oz. (2 Tbs) in 1 gallon water and uniformly spray 250 sq.ft. See Table 1 for additional spray preparations.

Kentucky Bluegrass, Fescue, Perennial Ryegrass and Zoysiagrass:

- Mix 1.25 fl.oz. (2.5 Tbs) in 1 gallon water and uniformly spray 250 sq.ft. See Table 1 for additional spray preparations.

Table 1. SPRAY PREPARATION FOR SPOT TREATMENTS OF VARIOUS LAWN GRASSES:

Gallons of water	St. Augustinegrass and Centipedegrass (fl.oz.)	Bermudagrass, Buffalograss and Bentgrass (fl.oz.)	Bluegrass, Perennial ryegrass, Zoysiagrass and Fescue (fl.oz.)	Area to Treat (sq.ft.)
1	0.5	1.0	1.25	250
2	1.0	2.0	2.5	500
3	1.5	3.0	3.75	750

EQUAL MEASURES: 1 fluid ounce (fl.oz.) = 2 tablespoons (Tbs.) or 6 teaspoons (tsp.)

Or

Table 1. SPRAY PREPARATION FOR SPOT TREATMENTS OF VARIOUS LAWN GRASSES:

Gallons of water	St. Augustinegrass and Centipedegrass (TBS)	Bermudagrass, Buffalograss and Bentgrass (TBS)	Bluegrass, Perennial ryegrass, Zoysiagrass and Fescue (TBS)	Area to Treat (sq.ft.)
1	1	2	2.5	250
2	2	4	5	500
3	3	6	7.5	750

EQUAL MEASURES: 1 fluid ounce (fl.oz.) = 2 tablespoons (Tbs.) or 6 teaspoons (tsp.)

Limitations on spot treatments:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 5.0 fl.oz. per 1,000 sq.ft. per application (0.48 lbs MCPP-p acid equivalent per acre). The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

For READY-TO-USE Hose End Sprayer with 32 fl.oz. jar capacity and with a 64:1 dilution rate. Two or three position (off, water only and spray) flow control with diptube.

- Attach (connect) garden hose to the sprayer body. Turn the water control valve of spray nozzle to the "OFF" position. Turn on water at faucet. Extend hose to the farthest area of lawn to be treated and work towards faucet. To begin spraying, turn the water control valve to the "SPRAY" position. The herbicide mixes automatically with the water. Walk at a steady pace while spraying evenly. Refer to graduated scale (view strip) on side of container to guide coverage. To stop spraying, turn (rotate) water control valve to the "OFF" position. Turn off water at faucet. To relieve pressure, turn water control valve to the "ON" position and point sprayer away from any desirable plants before disconnecting the sprayer body from the garden hose.

St. Augustinegrass and Centipedegrass:

- Do not apply to St. Augustinegrass or centipedegrass emerging from winter dormancy; temperatures below 45°F within 72 hours of application may cause damage.
- Do not use on 'Floritam' St. Augustinegrass in Florida.
- Spray evenly and uniformly over area requiring application. Spray entire contents (32 fl.oz.) uniformly on 16,000 sq.ft. of lawn.

Bermudagrass, Buffalograss and Bentgrass:

- Spray evenly and uniformly over area requiring application. Spray entire contents (32 fl.oz.) uniformly on 8,000 sq.ft. of lawn.

Kentucky Bluegrass, Fescue, Perennial Ryegrass and Zoysiagrass:

- Spray evenly and uniformly over area requiring application. Spray entire contents (32 fl.oz.) uniformly on 6,400 sq.ft. of lawn.

TIPS FOR IMPROVED CONTROL

Irrigation:

- Do not apply this product immediately before rainfall or irrigation. Rain or watering within 4 hours after treatment may reduce effectiveness.

Mowing:

- Delay mowing 1 to 2 days before and after the application of this product.

Reseeding Interval:

- Treated areas may be reseeded 2 weeks after application.

TURFGRASS TOLERANCE

- Newly seeded lawns can be sprayed after first mowing.
- Avoid applications to these turfgrasses weakened by drought stress, temperature extremes, insect damage, herbicide injury, or disease injury. To reduce risk of lawn injury, avoid spraying drought stressed lawns or when temperatures are above 90°F.
- Temporary injury may occur with this product on bermudagrass on fine leaf fescues (eg. creeping red fescue and chewings fescue).
- The turf tolerance of centipedegrass and St. Augustinegrass can range from sensitive to tolerant. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

Prohibitions:

- Do not use this product on carpetgrass, dichondra or lawns containing desirable clovers.
- Do not exceed specified dosages for any area.

Do not apply as a fine mist because of potential for injury to desirable plants.

Do not use this product on or near desirable plants, including within the drip line of the roots of desirable trees and shrubs, since injury may result.

Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day. Rinse applicator over lawn area only.

EH-1421 Herbicide controls troublesome and common lawn weeds including henbit, chickweed and clovers in both northern and southern grasses (Table 2).

Do not apply more than two applications per year.

Table 2. A partial list of BROADLEAF WEEDS that are controlled or suppressed.

Annual yellow sweetclover	Clover, crimson	Mexicanweed	Speedwell
Aster	Clover, hop	Milk vetch	Spiny amaranth
Austrian fieldcress	Clover, red	Mouseear hawkweed	Spiny sowthistle
Bedstraw	Clover, strawberry	Mugwort	Spotted catsear
Beggarticks	Clover, sweet	Narrowleaf plantain	Spotted spurge
Betony, Florida	Clover, white	Narrowleaf vetch	Spurweed
Bird vetch	Cockle	Nettle	Stinging nettle
Bitter wintercress	Creeping Jenny	Orange hawkweed	Strawberry, India mock
Bittercress, hairy	(Creeping Charlie)	Oxalis	Tall nettle
Bitterweed	Cudweed	Parsley-piert	Tansy ragwort
Black mustard	Curly dock	Parsnip	Thistle
Blackseed plantain	Daisy, English	Pearlwort	Trailing crownvetch
Blessed thistle	Daisy fleabane	Pepperweed	Tumble mustard
Bloodflower milkweed	Daisy, oxeye	Pigweed	Tumble pigweed
Blue lettuce	Dandelion	Pineywoods bedstraw	Venice mallow
Bracted plantain	Dichondra	Plains coreopsis	Virginia buttonweed
Bristly oxtongue	Dollarweed	Plantain	Virginia pepperweed
Broadleaf dock	False dandelion	Poison ivy	Wavyleaf bullthistle
Broadleaf plantain	False sunflower	Poorjoe	Western clematis
Buckhorn plantain	Florida pusley	Prairie sunflower	Wild aster
Bulbous buttercup	Galinsoga	Prostrate knotweed	Wild carrot
Bull thistle	Goldenrod	Prostrate pigweed	Wild four-o'clock
Bullnettle	Ground ivy	Prostrate spurge	Wild garlic
Burclover	Gumweed	Purslane, common	Wild geranium
Burdock	Hairy fleabane	Ragweed	Wild lettuce
Burning nettle	Hawkweed	Red sorrel	Wild marigold
Burweed	Healall	Redroot pigweed	Wild onion
Buttercup	Heartleaf drymary	Redstem filaree	Wild strawberry
Buttonweed	Heathaster	Rough cinquefoil	Wild vetch
Canada thistle	Henbit	Scarlet pimpernel	Woodsorrel
Carolina geranium	Hoary cress	Sheep sorrel	Woolly croton
Carpetweed	Hoary plantain	Shepherdspurse	Woolly plantain
Catchweed bedstraw	Hoary vervain	Slender plantain	Wormseed
Catnip	Knawel	Smallflower galinsoga	Yarrow
Catsear	Knotweed	Smooth dock	Yellow rocket
Chickweed, common	Lambsquarters	Smooth pigweed	Yellowflower
Chickweed, mouseear	Lespedeza	Sorrel	pepperweed
Chicory	Mallow	Sowthistle	and other broadleaf
Cinquefoil	Matchweed	Spanishneedles	weeds

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. Store in original container and place in locked storage area when not using.

CONTAINER DISPOSAL: **If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call you local solid waste agency for disposal instruction. 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. 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 Contents: _____
- EPA Est. No. _____

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

- One quart covers up to 6,400, 8,000 or 16,000 square feet.
- This formulation covers up to 16,000 square feet per quart.
- One quart of product may treat up to 16,000 square feet of lawns established with St. Augustinegrass and centipedegrass.
- Controls common and troublesome weeds in lawns.
- Controls troublesome weeds including dandelion, chickweed, and clover.

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 02217-00891.20080818.proposed.doc

2. Reason for Issue: Respond to EPA comments.