

PM 23

FEB 18 1999

Ms. Diane Miller
Frank Miller & Sons, Inc.
13831 South Emerald Avenue
Riverdale, IL 60827

Dear Ms. Miller:

Subject: Label Amendment to Comply with the 2,4-D Exposure Reduction Agreement
Trio Lawn Weed Killer
EPA Registration Number: 8123-205
Your Resubmission Dated February 1, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following revisions:

1. Delete the first of the two nearly identical statements under the product name: "For Selective and Broadleaf Weed Control in Ornamental Lawns and Turf Grasses."
2. On page 4, in the paragraph which begins "IMPORTANT:", revise the second sentence to read as follows: "Do not dispose of solution used to clean sprayer near desirable plants." The current wording ("Do not pour solution used to clean sprayer near desirable plants.") conflicts with required statements under Environmental Hazards prohibiting users from pouring equipment washwaters on the ground.
3. Revise the Storage and Disposal section to read as follows:

STORAGE AND DISPOSAL

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

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Store at temperatures above 32°. If allowed to freeze, remix before using. This does not alter this product. Containers should be opened in well-ventilated area. Keep container tightly sealed when not in use. Do not stack cardboard cases more than two pallets high.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #9:S556639.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Feb 18, 1999							

PESTICIDE DISPOSAL: Pesticide wastes are toxic. If container is damaged or if pesticide has leaked, contain all spillage. Absorb and clean up all spilled material with granules or sand. Place in a closed labeled container for proper disposal. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate ground water. 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

4. Correct the typographical error in the Environmental Hazards section. In the fourth sentence, replace the comma with a semi-colon. The revised sentence should read:

"Do not contaminate water when disposing of equipment washwaters nor pour the washwater on the ground; spray or drain over a large area away from wells and other water sources."

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed labeling incorporating these changes before you release the product for shipment.

Sincerely yours,



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

Enclosure

TRIO LAWN WEED KILLER
For Selective and Broadleaf Weed Control in Ornamental Lawns and Turf Grasses

FOR SELECTIVE BROADLEAF WEED CONTROL IN ORNAMENTAL LAWNS AND TURF GRASSES

ONE QUART COVERS 10,000 SQUARE FEET

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	4.55%
Dimethylamine Salt of 2-(2-Methyl-4-chlorophenoxy) propionic Acid**	4.58%
Dimethylamine Salt of 2-(2,4-Dichlorophenoxy) propionic Acid***	4.53%
INERT INGREDIENTS	<u>86.34%</u>
TOTAL	100.00%

Isomer Specific AOAC Method, Equivalent to:

* 2,4-Dichlorophenoxyacetic Acid	3.8% or 0.33 lbs./gallon
**2- (2-Methyl-4-chlorophenoxy) propionic Acid	3.8% or 0.33 lbs./gallon
***2- (2,4-Dichlorophenoxy) propionic Acid	3.8% or 0.33 lbs./gallon

KEEP OUT OF REACH OF CHILDREN

WARNING

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT**

EPA REG. NO. 8123-205
EPA EST. 8123-IL-1

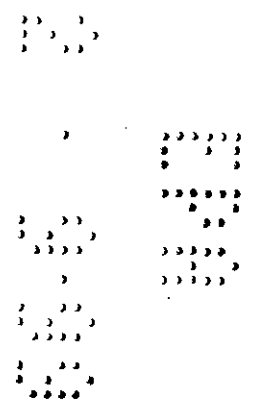
Net Contents:

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

FEB 18 1999

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
8123-205**

Manufactured By:
Frank Miller & Sons, Inc.
13831 South Emerald Avenue
Riverdale, IL 60827-1695



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes or on clothing. Avoid breathing spray mist and contact with skin. When mixing, loading or applying 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. After using this product, 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. The maximum number of broadcast applications to turf per treatment site is 2 per year. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

If this container is over one gallon and less than five gallons, then persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a 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.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

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 mean mark. Do not contaminate water when disposing of equipment washwaters nor pour washwater on the ground, spray or drain over a large area away from the wells and other water sources. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes. If spill occurs, collect the material and dispose of by following disposal instructions on this label.

ENVIRONMENTAL HAZARDS (con't)

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

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a way that is inconsistent with its labeling. READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

WEEDS CONTROLLED

This herbicide is effective for the control of Black Medic, Buckhorn, Burdock, Buttercup, Canada Thistle, Carpet Weeds, Chickweed, Chicory, Clover, Cocklebur, Dandelion, Dock, Dog Fennel, English Daisy, Florida Pursley, Frenchweed, Ground Ivy, Hawkweed, Heal-All, Heartloaf Drymary, Henbit, Jimson Weed, Knotweed, Lambsquarter, Mallow, Morning Glory, Mustard, Oxalis, Pennywort, Pepperweed, Pigweed, Plantain, Poison Ivy, Poison Oak, Purslane, Rag Weed, Red Clover, Red Sorrel, Sheep Sorrel, Smartweed, Spurge, Spur Weed, Stitchwart, Toadflax, Veronica, Wild Aster, Wild Carrot, Wild Sorrel, Yarrow, and many other broadleaf weeds.

After applying this product, many broadleaf weeds will begin to show visible signs of leaf curl within a few days. Some hard to control broadleaf weeds may require a second treatment in 3 to 4 weeks. In the event further applications are needed, use as a spot treatment.

If lawn needs watering, water thoroughly before application. Do not water for 48 hours after application. Spray entire lawn, wetting weeds and lawn grasses; do not overspray. Spray when air is calm to avoid spray drift that may injure desirable ornamental plants. Do not apply when temperatures are expected to exceed 85°F within 24 hours following application. Make new dilution for each use.

NEWLY SEEDED LAWNS may be treated after they have been mowed at least 3 times.

BENT, BERMUDA, RED FESCUE, CARPET, ST. AUGUSTINE AND CENTIPEDE GRASSES: Use a one-half rate which is 4 to 6-1/2 ounces in 6 gallons of water to treat 2,500 square feet of lawn. Make two applications 10 days apart. Do not spray grasses if stressed from heat, drought, etc. Slight turf yellowing should disappear after about 1 week. Do not apply to Dichondra, Lippia, and Clover lawns.

LAWN WEEDS: To kill dandelion, Wild onion, Pennywort, Plantain, Heal-all and similar weeds: Use 8 to 13 ounces in 6 gallons of water and apply with pump or hose-end sprayer, or sprinkling can to 2,500 square feet of lawn. For smaller areas use 3 teaspoonfuls in 2 quarts of water applied to 100 square feet. For larger areas use 1 to 1-3/4 gallons in 50 gallons of water for 43,560 square feet.

To kill undesirable plants such as Poison ivy and Poison oak, use 2 ounces in 2 quarts of water or 2 gallons in 12-1/2 gallons of water and drench plants when they are fully leaved. Repeat in about 4 weeks if necessary. Certain hard-to-kill weeds such as Poison ivy, Poison oak and English daisy may require a Fall application.

