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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 22 1995

Elizabeth D. Owens, Ph.D.
 ISK Biosciences Corporation
 5966 Heisley Road
 P.O. Box 8000
 Mentor, Ohio 44061-8000

Dear Dr. Owens:

SUBJECT: Label Amendment to Update Dormant Product Registrations
 Triban-D
 EPA Registration No. 50534-151
 Your Application Dated May 12, 1994

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

1. On the front panel of the labeling, immediately following the signal word, there is a typographical error in the phrase which states who can buy this product. The second line of this statement should read, "...personnel or commercial applicators."
2. Replace your ground water statement to make it in accordance with the the 2,4-D labeling guidelines:

"Most cases of groundwater contamination involving phenoxy herbicides such as MCPP and 2,4-D have been associated with mix/loading and disposal sites. Caution should be exercised when handling 2,4-D and MCPP pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or 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."

CONCURRENCES							
SYMBOL	7505C						
SURNAME	N. Nelson						
DATE	3/22/95						

3. Under the "Storage and Disposal" section, in the pesticide disposal statement, replace the third sentence which begins with , "Pesticide, spray mixture..." with the following statement.

"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."

Sincerely yours,

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

Enclosure

Net Contents: 55 Gallons/208.1 Liters

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 22 1995

Triban-D
Turf Care™
Broadleaf Herbicide

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
50534-151

Active Ingredients:

Dimethylamine salt of 2,4-dichlorophenoxyacetic acid)*	27.6%
Dimethylamine salt of 2-(2-methyl-4-chlorophenoxy) propionic acid)**	13.9%
Dimethylamine sale of Dicamba (3,6-dichloro-o-anisic acid)***	2.7%

Inert Ingredients:	55.8%
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Total:	100.00%
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-) * 2,4-dichlorophenoxyacetic acid equivalent: 22.9%, 2.2 lbs./gal.
** 2-(2-methyl-4-chlorophenoxy) propionic acid equivalent: 11.4%, 1.1 lbs./gal.
*** 3,6-dichloro-o-anisic acid equivalent: 2.2%, 0.22 lbs./gal.
Above is based on Isomer specific by A.O.A.C. Method

Keep Out of Reach of Children

DANGER:

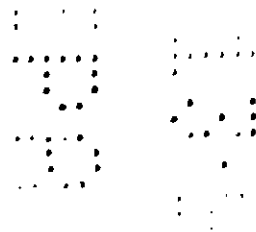
**Only for Sale To, Use and Storage by Lawncare and Landscaping Personnel
of Commercial Applicators**

See side panel for additional precautionary statements.

ISK Biotech Biosciences Corporation

5966 Heisley Road
P.O. Box 8000
Mentor, Ohio 44061-8000

EPA Reg. No. 50534-151
EPA Est. No.



Precautionary Statements

Hazards to Humans and Domestic Animals

DANGER

Corrosive causes eye damage and skin irritation. Harmful if swallowed or absorbed through the skin.. **Do not** get in eyes, on skin or on clothing. ~~Wear chemical goggles, rubber gloves and protective clothing when handling.~~

Do not breathe spray mist. ~~Wash thoroughly after handling.~~ Keep container closed.

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.

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.

A mechanical system (probe and pump) 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 reused before removal.

Keep container closed.

In case of contact:

- immediately flush eyes with plenty of water for at least 15 minutes holding eyelids apart to ensure flushing of the entire surface. Seek medical attention.
- wash exposed skin gently with plenty of soap and water. Wash clothing before reuse and discard footwear which cannot be decontaminated. Seek medical attention.

If swallowed, have conscious person drink several glasses of water, then induce vomiting by tickling back of throat with finger. Keep airway clear. **Never** give anything by mouth to an unconscious person. Seek medical attention.

Do not allow people (other than applicator) or pets on treated area during application.

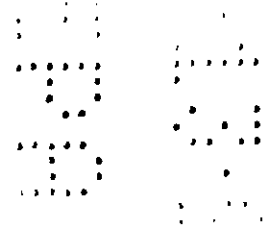
Do not enter treated areas until the spray has dried or dust has settled.

Protective Clothing:

~~"Mixers/loaders and applicators must wear long pants, long sleeved shirts and gloves. Persons applying liquid MCPP products such as sprays are required to use goggles to cover their eyes." Mixers/loaders may use face shield or goggles during mixing/loading operations, in addition to the protective clothing.~~

Environmental Hazards

Drift or runoff may adversely affect nontarget plants. **Do not** apply directly to water, or wetlands (swamps, bog, marches, and potholes) to areas where surface water is present or to intertidal areas below the mean high water mark.



Do not contaminate irrigation ditches or water used for domestic purposes. Use care to avoid spray contact or drift to 2,4-D susceptible plants such as cotton, tomatoes, flowers, grapes, fruit trees and ornamentals. **Do not** permit spray mist containing **Triban-D** to drift onto them, since even very small quantities of the spray, which may not be visible can cause severe injury during both growing and dormant periods. **Do not** spray when the wind is blowing towards susceptible crops or ornamental plants. Use coarse sprays to minimize drift. Spray drift can be lessened by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by using no more than 20 pounds spray pressure with flat fan or flooding flat fan nozzle tips; by spraying when wind velocity is low; and by stopping all spraying when wind exceeds 8 miles per hour. **Do not** apply with hollow cone-type insecticide or other nozzles that produce a fine droplet spray. *Flush sprayer out on suitable non-crop area after use.* **Do not** use the same spray equipment for applying other materials to 2,4-D susceptible crops as injury may result.

Triban-D Turf Care™

Read entire label before using this product.

General Information

Triban-D is especially effective against weeds such as Sheep sorrel, Knotweed, Spotted spurge, Chickweed, Oxalis and Henbit. In addition to these it control virtually all broadleaf weeds, some of which are listed below:

Black medic	Pepperweed
Buckhorn plantain	Pigweed
Burdock	Plantains
Chicory	Poison ivy
Chickweed	Poison oak
Clover	Purslane
Dandelion	Ragweed
Dock	Sheep sorrel
Ground ivy	Shepherdspurge
Healall	Speedwell
Henbit	Spurge
Knotweed	Wild carrot
Lambsquarters	Wild garlic
Lespedeza	Wild lettuce
Mallow	Wild onion
Momingglory	Yarrow

Do not allow spray to get on vegetables or ornamental plants since injury may result. Some injury can be expected to turf when used on Centipede or St. Augustinegrass lawns. "Spot Spray" weeds only. Clover present will be damaged if sprayed.

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Note: Local conditions, crop varieties and application regulations vary and may affect use of this herbicide. Consult local agricultural experiment station or extension service weed specialists and state regulatory agencies for recommendations in your area.

Note: When stored at temperatures below freezing, it may be necessary to warm contents to 45°F and mix thoroughly before using.

Note: MCP P is not cleared for use on food crops and care should be taken not to make applications where spray drift or water run-off would carry the chemical to food crops or grazing land where cattle, sheep, goats, swine or poultry would be exposed.

Directions for Use

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

Do Not apply 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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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

Do not apply this product through any type of irrigation equipment.

The maximum number of broadcast applications per treatment site is 2 per year.

Worker Reentry:

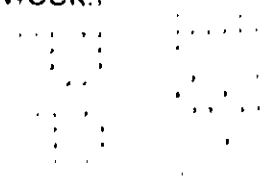
Do not reenter or permit workers to reenter treated areas until sprays have dried.

Ground Water Contamination:

Although highly mobile, in general phenoxy herbicides such as MCP P are not sufficiently persistent to reach groundwater from use as specified on product labels. Most cases of ground water contamination involving phenoxy herbicides have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCP P pesticides at such sites to prevent contamination of water supplies.

) **Ornamental, Lawns and Turf (other than bentgrass):** Apply Triban-D at the rate of 3-1/4 to 4 pints per acre in sufficient water for adequate coverage. Maximum control of weeds will be obtained from spring or early fall application when weeds are actively growing. Avoid applying during long excessively dry or hot periods unless adequate irrigation is available. **Do not** irrigate within 24 hours of application. **Do not** apply to newly seeded turf until after the second or third mowing. Grass seed can be safely sown 3 to 4 weeks after application at recommended rate. **Do not** use on dichondra, carpetgrass and St. Augustinegrass.

Bentgrass Turf: In closely mowed bentgrass (putting and bowling greens) apply Triban-D at a maximum rate of 1 fluid ounce per 1,500 square feet preferably in May or mid-August through September. Slight turf yellowing will disappear after about one week.



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Note: Care should be taken to avoid overdosing bentgrasses or injury may result. Large volumes of spray water (i.e., 1 fl. oz. in 5 gallons of water per 1,500 sq. ft.) will aid in obtaining uniform coverage. If hand-type sprayers are used it is preferable to use a single nozzle sprayer rather than a multiple nozzle boom as sideways application with a boom where the spray from more than one nozzle is allowed to fall on the same area will result in heavy local over-application and subsequent turf discoloration or injury.

Roadside and General Weed Control: For control of broadleaf weeds along roads, right-of-ways, drainage ditchbanks and other similar non-crop areas, mix 2 to 3 gallons of **Triban-D** in water to make 100 gallons of spray, and apply 30 to 35 gallons per acre. Use higher rate for larger or more dense weed stands. Best results are obtained when weeds are young and actively growing.

For use on plants in non-crop and non-timber areas only. Not for use on crops, timber, or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Disposal: *Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law and may contaminate ground water.*

Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under the Resource Conservation and Recovery Act.

Container Disposal: **Do not** reuse empty container. Triple rinse (or equivalent) and offer for recycling or reconditioning or dispose of in a sanitary landfill, or by other approved state and local procedures.

Warranty and Limitation of Damages

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions.

SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO. DO SO EXCEPT IN WRITING WITH A SPECIFIC REFERENCE TO THIS WARRANTY. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product, weather conditions, cultural practices, moisture conditions or other environmental conditions outside of the ranges that are generally recognized as being conducive to good agricultural and/or horticultural practices.