



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 27, 2022

Dustin Darnall  
Product Safety and Regulatory Affairs Engineer  
Berry Global, Inc.  
70 Old Hickory Blvd.  
Old Hickory, TN 37138

Subject: Registration Review Label Mitigation for Trifluralin  
Product Name: BIOBARRIER ROOT CONTROL SYSTEM  
EPA Registration Number: 59823-1  
Application Date: 2/28/2020  
Decision Number: 566985

Dear Dustin Darnall:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Trifluralin Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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 the Federal Insecticide Fungicide and Rodenticide Act 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.

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 12 months from the date of this letter. After 12 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.

Page 2 of 2  
EPA Reg. No. 59823-1  
Decision No. 566985

If you have any questions about this letter, please contact Quinn Gavin by phone at 202-566-2284, or via email at [gavin.quinn@epa.gov](mailto:gavin.quinn@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a long horizontal flourish extending to the right.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

**Precautionary Statements  
Hazards to Humans and  
Domestic Animals**

**CAUTION**

Harmful if swallowed. Harmful if inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, on skin or on clothing. Prolonged or frequently repeated skin contact with the active ingredient, Trifluralin, may cause allergic reaction in some individuals.

For additional information in case of emergency call toll free 1-800-424-9300.

**First Aid**

**If swallowed:**

- 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 a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

**If in eyes:**

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye.
- Call poison control center or doctor for treatment advice.

**If on skin or clothing:**

- 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 inhaled:**

- Move person to fresh air.
- If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

Have the product container label with you when calling a poison control center or doctor, or going for treatment.

**Personal Protective Equipment (PPE)**

**Applicators and all other Handlers must wear:**

- Long Sleeved shirt and long pants,
- Shoes and socks, and
- Chemical resistant gloves such as or made of any waterproof material.

**User Safety Requirements:**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions 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.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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.

**Biobarrier  
Root Control System**

Biobarrier® is a multi-year root control system consisting of time-release nodules impregnated with a herbicide. The nodules are attached permanently to a flexible and permeable geotextile fabric which can be contour applied to a wide variety of applications and which will inhibit plant root development in the applications set forth below.

**Active Ingredient:**

**Nominal**

Trifluralin (α,α,α-trifluoro-2,6-dinitro-N,N-dipropyl-p-toluidine).....17.5%  
Inert Ingredients:.....82.5%  
TOTAL.....100.0%

Net Contents: 4-60lbs

**KEEP OUT OF REACH  
OF CHILDREN**

**CAUTION**

**Side panel for additional  
Precautionary Statements.**

Manufactured for



Manufactured by  
Fiberweb, Inc  
70 Old Hickory Blvd.  
Old Hickory, TN 37138  
1-800-257-6687

EPA Registration No. 59823-1  
Establishment No. 59823-TN-1

TRIFLURALIN	GROUP	<b>3</b>	HERBICIDE
-------------	-------	----------	-----------

**PESTICIDE STORAGE AND DISPOSAL**

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

**Pesticide Storage:** Store in original container only. Store in a dry place out of direct sunlight.

**Pesticide Disposal:** Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Completely empty container. Then dispose of wrap and/or box in a sanitary landfill or by incineration, or, if allowed by State and Local authorities, by burning. If burned, stay out of smoke. Non-refillable container. Do not reuse or refill this container.

**Directions:**

**Biobarrier® is a multi-year root control system which is strategically positioned in the soil to protect structures from plant root encroachment (see applications). Biobarrier® controls roots by establishing an in-soil barrier plane of trifluralin, which prevents root tip cell division. Roots are either stopped or redirected away from structures. Trifluralin is not systemic but can limit root mass. The multi-year feature of Biobarrier® is provided by a time-release mechanism which continues to meter trifluralin into the soil as the exposed trifluralin biologically and chemically degrades. Structure protection is provided by placing the Biobarrier® fabric between the root source and the structure. Since the fabric is flexible and permeable, installation may be custom contoured to obtain the most desirable root system redirection for the application and/or to accommodate obstacles.**

**Installation Directions:**

Biobarrier® is ready for in-soil installation as received. The fabric should be in soil as soon as practical after removal from the sealed shipping container, minimizing exposure to direct sunlight and elevated temperatures. Prolonged exposure can reduce the effective life of the product. Biobarrier® should not be installed in water. Store any unused portions of the product tightly resealed in the original container in a dry place.

Biobarrier® can be installed in the soil vertically, horizontally, or as a surround. Vertical applications typically require standard ditch/trench digging equipment (follow all applicable codes when digging below surface). Vertical fabric position can be maintained by suspending it at the top with pegs. Horizontal applications may require seaming or hold down pegs. Surround applications may involve a variety of holding devices to assure fabric position. In all applications, nodules must be no further than one and one-half inches apart in order to assure a continuous root control plane. Fabric should extend a minimum of 18" beyond structure area to be protected as roots can grow around edges of fabric. For vertical applications, the top edge must be even with the soil surface. A minimum of 2" soil overlay should also be maintained for horizontal applications.

Biobarrier®, used in retrofit applications where roots are already present, requires roots be interrupted with a root pruner or equivalent device and removed. Root control will not be effective if roots penetrate fabric at time of installation.

**(SEE ADDITIONAL DIRECTIONS  
ENCLOSED)**

**ACCEPTED**

Sep 27, 2022

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 59823-1

### **Environmental Hazards:**

This pesticide is extremely toxic to freshwater, marine, estuarine fish, and aquatic invertebrates including shrimp and oyster. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-waters.

### **NON-TARGET ORGANISM ADVISORY STATEMENT:**

This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions.

### **Physical Hazards:**

Do not store near heat or open flame.

### **Directions for Use:**

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

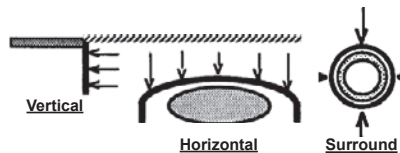
Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application. The Worker Protection Standard applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

### **WEED RESISTANCE MANAGEMENT:**

For resistance management, Trifluralin is a Group 3 herbicide. Any weed population may contain or develop plants naturally resistant to Trifluralin and other Group 3 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field. Appropriate resistance-management strategies should be followed.

## **Biobarrier® Applications**

Bicycle Paths	Roads
Building Foundations	Roof Gardens
Burial Vaults/Tombstones	Septic Tanks/Fields
Curbs	Sidewalks
Earthdams	Swimming Pools
Golf Greens/Tees/Cart paths	Tennis Courts
Landfills	Underground Pipes/ & Cables
Medians	Utility Substations
Non-Food/Ornamentals	Weed Control
Planting Beds/Containers	
Retaining Walls	



### **Disclaimer of Warranties**

To the extent consistent with applicable law, the Seller makes no warranties concerning this product or its use which extend beyond the standard specifications for the products. **To the extent consistent with applicable law, the Seller makes no warranties of merchantability or fitness for a particular purpose, or any other express or implied warranty.** Buyer assumes all risk and liability resulting from use of the products delivered hereunder, whether used singularly or in combination with other products. All statements concerning this product apply only when used as directed.

### **Limitation of Damages**

No claim of any kind, whether as to products delivered or for nondelivery of products, and whether or not based on negligence, shall be greater in amount than the purchase price of the products in respect to which damages are claimed. No charge or expense incident to any claims will be allowed unless approved by an authorized representative of Seller. Products shall not be returned to seller without Seller's prior permission, and then only in a manner prescribed by Seller. **To the extent consistent with applicable law, the remedy hereby provided shall be the exclusive and sole remedy of Buyer, and in no event shall either party be liable for special, indirect or consequential damages, whether or not caused by or resulting from the negligence of such party.**