



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

SEP 12 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Nufarm Americas Inc.
150 Harvester Drive
Suite 200
Burr Ridge, IL 60527

Subject: EPA Reg. 228-160 (3 Plus 3 Amine Turf Herbicide) / 2,4-D RED Label Amendment

The labeling referred to above is in compliance with the 2,4-D 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) The First Aid statements should appear on the label with the "If on Skin or Clothing" statement before the "If Swallowed" statement.
- 4) A Note to Physician must be added to the label which reads "Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage."
- 5) The Hazards to Humans and Domestic Animals must be revised to read as follows:
"Corrosive. Causes irreversible eye damage. Causes skin irritation. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."
- 6) The glove statement in the PPE section must be revised to read "chemical-resistant gloves."
- 7) The first sentence under the Engineering Control Statements section must be deleted from the label. In addition, the mechanical transfer text (the remainder of the paragraph) may be removed from the label.
- 8) Change "may be toxic" to "is toxic" and add the following text to the end of the first sentence of the Environmental Hazards section: "...and may adversely affect non-target plants."
- 9) With the exception of drift-related text appearing in the Environmental Hazards ("Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas") and General Precautions and Restrictions ("Do not apply this product in a way that will contact workers or other persons, either directly or through drift"), all drift text appearing on the label must be

placed together and be located below the following required text. Any conflicting text must be deleted from the label.

Spray drift text must be added to the label and read:

"Spray Drift Management

A variety of factors including weather conditions (e.g., wind directions, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

Use a medium or coarser spray nozzles according to (ASAE standard 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All ground application equipment must be properly maintained and calibrated using appropriate

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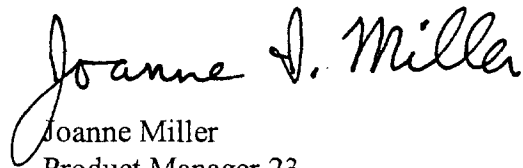
carriers or surrogates.

Do not apply with a nozzle height greater than 4 feet above the crop canopy.”

10) Under the **Limitations** section, delete the text “excluding spot treatments” and add the statement “A minimum of 30 days between applications is required.”

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)

rec'd 4/18/08
4/7

3 PLUS 3 AMINE Turf Herbicide

**ACCEPTED
with COMMENTS**
In EPA Letter Dated:
SEP 12 2008

**A SELECTIVE HERBICIDE TO CONTROL BROADLEAF WEEDS
GET THE OPTICAL ADVANTAGE®**

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

228-160

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	33.95%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy) propionic Acid**‡	17.06%
OTHER INGREDIENTS:	48.99%
TOTAL:	100.00%

By Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	28.2%, 2.70 lbs./gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy) propionic Acid	14.1%, 1.35 lbs./gal.

‡ CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p

**KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

(Spanish language optional)

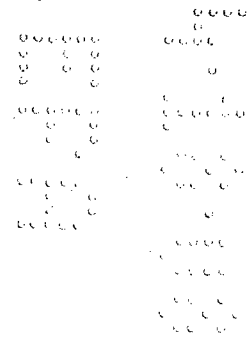
EPA REG. NO. 228-160
EPA EST. NO. 228-IL-1

MANUFACTURED BY
NUFARM AMERICAS INC.
150 HARVESTER DRIVE
BURR RIDGE, IL 60527



NET CONTENTS GALS.

000228-00160.20080416.EPA.24d.Pending



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER - PELIGRO**

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Avoid contact with skin or clothing. Wear protective eyewear such as face shield, goggles, or safety glasses. It is recommended that safety glasses include front, brow and temple protection. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Some materials that are chemical-resistant to this product are made of any waterproof material. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, flaggers, and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes and socks, plus
- chemical-resistant gloves, when applying with any handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.
- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.
- protective eyewear

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statement:

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. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS	
Users Should:	
<ul style="list-style-type: none"> • Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water. • 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. 	

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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 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.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
<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 1-877-325-1840 for emergency medical treatment information.</p>	

ENVIRONMENTAL HAZARDS

This pesticide may be toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters 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. READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

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.

GENERAL INFORMATION

This product is a post-emergence herbicide especially formulated for use on turfgrass for selective control of many broadleaf weeds commonly growing in lawns without injury to desirable grasses. This product may be used on such types of turf as Marion, Kentucky bluegrass, Bermudagrass, fescues and rye grasses. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

USE PRECAUTIONS

CARE MUST BE TAKEN TO AVOID DRIFT OF SPRAY MISTS TO NON-TARGET susceptible plants such as cotton, vegetables, flowers, ornamentals, shrubs, trees, and other desirable plants. Do not spray near these plants. Do not spray on buffalo, carpetgrass, dichondra, St. Augustine, nor on grasses where desirable clovers are present. This product has been used successfully on bentgrass; however, it should not be used unless prior tests have shown it to be non-damaging under the particular conditions of use. To eradicate broadleaf weeds, it is better to use another selective herbicide for fine lawn grasses. Apply in Spring or Fall when weeds are actively growing. Use a lawn type sprayer with coarse spray as wind drift is less likely. Avoid fine mists. Do not spray exposed roots of desirable plants. Use the higher rate for hard-to-kill weeds. Do not exceed specified application dosages for any area. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90°F. Avoid applying during excessively dry or hot periods unless irrigation is used. For optimum results, (1) turf should not be mowed 1 to 2 days before and following application; (2) Do not apply if rainfall is expected within 48 hours; nor should lawns be irrigated (watered) for 48 hours following application. Reseed no sooner than 3 to 4 weeks after application of this product.

WEEDS CONTROLLED

The following is a partial list of weeds controlled:

Buckhorn	Lambsquarter	Red clover
Clover	Mallow	*Red sorrel
Common chickweed	Morningglory	Stitchwort
Curly dock	Mousear chickweed	*Speedwell
*Dandelion	Pigweed	White clover
*English daisy	Plantain	*Wild garlic
Ground ivy	Purslane	*Wild onion
Knotweed	Ragweed	Yarrow

* Use high rate on chart for weeds marked with an asterisk (*) in the above list. Knotweed is controlled more easily in Spring or early Summer when weeds are young.

Note: MCPP-p acts more slowly than 2,4-D so that some weeds will be controlled before others. Allow 3 to 4 weeks for complete weed control action to occur.

APPLICATION RATES

	Rate per 1,000 Square Feet (Fluid Ounces)	Rate per Acre (Quarts)
Low Rate	1.25	1.66
High Rate	1.5	2.0

Preparation Of The Spray: This product must be mixed with water prior to use. For best results use 2 to 4 gallons of water per 1,000 square feet for smaller areas; 20 to 40 gallons of water per acre for larger areas. Apply by means of a sprayer to give uniform coverage. Repeat applications may be necessary especially with heavy infestations of the less susceptible weeds indicated with an asterisk in above list. Two days before or after application, it is wise to properly fertilize the lawn so as to encourage the lawn to heal as rapidly as possible, filling in the bare areas where the weeds have died away. Once the weeds have been removed, the bare areas should be reseeded.

Limitations: The maximum rate per application is 2 quarts per acre, limited to 2 applications per year. The maximum seasonal rate is 4 quarts per acre, excluding spot treatments

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STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Store at temperatures above 32°F. 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. Do not store near open containers of fertilizer, seed or other pesticides.

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 mixtures, 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: Nonrefillable container: Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. 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.

Refillable Container: Refill this container with pesticide only. Do not reuse this container for any other purpose. Close all openings and replace all caps. Contact Nufarm's Customer Service Department at 1-800-345-3330 to arrange for return of the empty refillable container.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

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