



000228-00180-061799

Printed: 09:56:53 Wednesday, 21 Jul, 1999 # 16 / 3644

Systems Integration Group, Inc.

PM23

228-180

6/17/99

1075

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 17 1999

Mr. Russell F. Sawyer  
Riverdale Chemical Company  
425 West 194th Street  
Glenwood, IL 60425-1584

Dear Mr. Sawyer:

Subject: Conversion from 2,4-DP and MCPP to 2,4-DP-p and MCPP-p  
Riverdale 3-Way Weed and Feed with Triamine  
EPA Registration Number: 228-180  
Your Resubmission Dated June 8, 1999

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredients, dichlorprop and mecoprop, from their racemic forms [2-(2,4-dichlorophenoxy) propionic acid and 2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salts thereof] to their single isomer forms [(+)-R-2-(2,4-dichlorophenoxy) propionic acid and (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salts thereof]. The revised labeling and Confidential Statements of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statements of Formula (CSFs) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic forms of dichlorprop and mecoprop, or applicable salts thereof, and bearing the previously approved labeling for 18 months from the date of this letter.
3. You must correct the lower certified limit for the DMA salt of 2,4-Dichlorophenoxyacetic acid on the Basic and Alternate Formulation (#1 & 2) CSFs. The lower certified limit should be 0.140%, not 0.172%. We have corrected our file copies of the CSFs. Please correct your copies of the CSFs.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #10:228-180.cnv

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jun 17, 1999							

Copies of the corrected Confidential Statements of Formula (Basic and Alternate Formulations #1 and #2, dated 04/13/99) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

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

Sincerely yours,



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

Enclosure

(Non-Commercial Label)

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

3 of 5

RIVERDALE

3-WAY WEED AND FEED

WITH TRIAMINE™

X - X - X

JUN 17 1999

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
228-180

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE AND TURF FOOD  
COMBINATION WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF  
WEEDS WHILE PROVIDING BOTH FAST AND LONG FEEDING ACTION.

Weed contacted by this product gradually die and  
disappear from the lawn.

Treats (or covers) 2,500 Sq. Ft. (50' x 50')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS: †

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	0.156%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.078%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	0.077%
INERT INGREDIENTS:	99.689%
TOTAL	100.000%

ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2,4-Dichlorophenoxyacetic Acid	0.130%
**2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.065%
***2-(2,4-Dichlorophenoxy)propionic Acid	0.065%

†CONTAINS THE SINGLE ISOMER FORMS OF MECOPROP-p AND DICHLORPROP-p.

GUARANTEED ANALYSIS: °

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphoric Acid (P <sub>2</sub> O <sub>5</sub> )	X%
Soluble Potash (K <sub>2</sub> O)	X%

Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple  
Super Phosphate, and Muriate of Potash.

Chlorine (Cl) Maximum 2.5%

The urea nitrogen in this product has been coated to provide X% coated slow release  
urea nitrogen.

†TRIAMINE™ & THE OPTICAL ADVANTAGE™ ARE TRADEMARKS OF RIVERDALE CHEMICAL COMPANY Patent Pending

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS  
AND STATEMENT OF PRACTICAL TREATMENT

NET WEIGHT 20 LBS.

EPA REG. NO. 228-180

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

(Back Panel)

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION**

Avoid inhalation of dust and contact with eyes, skin, or clothing. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. The maximum number of broadcast applications 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 dust has settled.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Get medical attention.  
**IF IN EYES:** Flush eyes with water for 15 minutes. Get medical attention.  
**IF ON SKIN:** Wash skin with soap and water.

**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 mean high water mark. Do not contaminate water when disposing of equipment washwaters.

**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.

3-WAY WEED AND FEED WITH TRIAMINE is a stable mixture of three herbicides. It is for use on Lawns, Ornamental Turf, Parks, also Golf Fairways, Aprons, Tees and Roughs.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth and control many broadleaf weeds in lawns; such as:

Alders, Artichoke, Aster, Austrian fieldcress, Beggarticks, Bident, Bindweed, Bitterweed, Bitter winter cress, Black medic, Blessed thistle, Blue lettuce, Box elder, Broomweed, Buckhorn, Bull thistle, Burdock, Bur ragweed, Buttercup, Canada thistle, Carpetweed, Catnip, Chickweed, Chicory, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common sowthistle, Creeping jenny, Croton, Curly indigo, Dandelion, Dock, Dogbane, Dogfennel, Elderberry, English daisy, Flea bane (daisy), Flixweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Gumweed, Hawkweed, Healall, Heartleaf drymary, Hemp, Henbit, Hoary cress, Honeysuckle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarters, Locoweed, Lupines, Mallow, Marshelder, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nutgrass, Orange hawkweed, Oxalis, Parsnip, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prickly lettuce, Primrose, Puncture vine, Purslane, Ragweed, Red clover, Red sorrel, Rush, Russian thistle, St. Johnswort, Sheep sorrel, Shepherdspurse, Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spurge, Spurweed, Stinkweed, Stitchwort, Sumac, Sunflower, Sweet clover, Tarweed, Thistle, Toadflax, Tumbleweed, Velvet leaf, Veronica, Vervain, Vetch, Virginia buttonweed, Virginia creeper, Wild aster, Wild carrot, Wild garlic, Wild geranium, Wild lettuce, Wild onion, Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Willow, Witchweed, Woodsorrel, Wormseed, Yarrow, Yellow rocket and other broadleaf weeds.

**WHEN TO APPLY:** Best results are obtained when weeds are growing actively in Spring or early Fall. Apply when grass is moist (after a rain, sprinkling or dew). For most

effective broadleaf weed killing action, avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material. Do not apply if rainfall is expected within 48 hours following treatment. Avoid contact with desirable shrubs, plants, vegetables, or flowers. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 20 pound bag should be used on 2,500 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is equal to one application.

The following settings are approximate for applying contents of this package at a suggested rate of 8 pounds per 1,000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 2 pounds per 250 square feet. Clean spreader thoroughly after use.

SPREADER SETTINGS

ONE PASS APPLICATION:°

MAKE	SETTING
Cyclone	6 - 7
Scott's 35	5-1/2
Scott's C-1	J - L
Central	7 - 8
K-Mart	7 - 8
Montgomery Ward's (1091,1093,1095)	6-3/4
Sears Broadcast	6 - 7

Sweep all fertilizer materials from concrete surfaces immediately after application. Do not wash material from concrete surfaces because fertilizers which contain iron may cause discoloration upon oxidation.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in original container and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near other feed or foodstuffs. To prevent cross-contamination, do not store near other fertilizers, or near herbicides, insecticides, fungicides or seeds.

**PRODUCT DISPOSAL:** To dispose of bag which contains unused product, securely wrap original container in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse empty bag. Fold empty bag and discard in trash.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(RV 041395)

The following note will not be part of the actual label copy.

\*NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers.