

228-180

9/23/2008

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

SEP 23 2008

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

Dear Ms. Endres:

Subject: Label Amendment for RED: 2,4-D, and Dicamba  
3-Way Weed and Feed with Triamine  
EPA Registration Number 228-180

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label with the "If in Eyes" statement following the other statements currently on the label.
2. Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to include the statement "Harmful if absorbed through skin or inhaled. Causes moderate eye irritation."
3. Replace the first sentence of the Environmental Hazards section currently on the label with the following text:

"This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants."

Also, delete the text "except as noted on appropriate labels."

4. Under the **How to Apply** section, revise the text "2,5000 square feet" to read "2,500 square feet."

5. The following text must be added to the label:

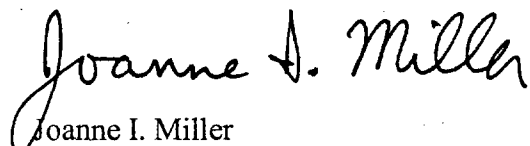
“Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter treated area until dusts have settled.”

“Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn or garden, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.”

6. Under the “Directions for Use” section, add the statements “Do not exceed 2 applications per year. A minimum of 30 days between applications is required.”
7. Delete “approximately” in the sentence “possible retreatment in approximately 30 days may be necessary...” appearing on page 3 of the label.
8. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at [white.tracy@epa.gov](mailto:white.tracy@epa.gov).

Sincerely,

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

Enclosure

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# 3-WAY WEED AND FEED WITH TRIAMINE®

X-X-X

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.

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

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

<b>INERT INGREDIENTS:</b>	99.689%
<b>TOTAL:</b>	100.000%

**ISOMER SPECIFIC METHOD, EQUIVALENT TO:**

*2,4-Dichlorophenoxyacetic Acid	0.130%
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.065%
***(+)-R-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 Phosphate (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	X%

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

Fertilizer guaranteed by (Name of fertilizer registrant)

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
 SEE BACK PANEL 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

EPA REG. NO. 228-180  
EPA EST. NO. 228-IL-1

**ACCEPTED**  
 with **COMMENTS**  
 In EPA Letter Dated: 150 HARVESTER DRIVE  
 SEP 23 2008 BURR RIDGE, IL 60527

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



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

NET WEIGHT 20 LBS.

000228-00180.20071106.res.EPA24D.Pending

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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Avoid inhalation of dust and contact with eyes, skin, or clothing.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

**All loaders, applicators, and other handlers must wear:**

- long-sleeved shirt and long pants,
- shoes plus socks.

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

<b>USER SAFETY RECOMMENDATIONS</b>	
<b>Users Should:</b>	
<ul style="list-style-type: none"> <li>• Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.</li> <li>• 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.</li> <li>• 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.</li> </ul>	

<b>FIRST AID</b>	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
<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 except as noted on appropriate labels. 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.**

**3-WAY WEED AND FEED WITH TRIAMINE** is a stable mixture of three herbicides. **It is for use on Residential Turf.**

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 in lawns and control many broadleaf weeds such as: Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, Bide, Bindweed, Bitterweed, Bitter wintercress, 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, Lambsquarter, Locoweed, Lupine, Mallow, Marshelder, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nutgrass, Orange hawkweed, Oxalis, Parsnip, Pennycress, Pennywort, Peppergrass,

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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, Sick-lepod, 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, 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.

**SPREADER SETTINGS  
ONE PASS APPLICATION\***

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

Sweep (do not wash) all fertilizer materials from surfaces immediately after application, because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

(The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 pound nitrogen/1,000 square feet; otherwise, this information is optional.)

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing \*(No. of lbs.)\* pounds of nitrogen per 1,000 square feet (optional P<sub>2</sub>O<sub>5</sub> and K<sub>2</sub>O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

\*Based on Inert Fertilizer claimed.

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**Environmental Benefits**

(Grasscycling Logo)

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

- Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.*
- √ A 50' x 50' lawn produces enough oxygen for a family of 4 every day
- √ Reduces Glare & Reduces Noise
- √ Traps Dust, Smoke Particles & Other Pollutants
- √ Purifies Water & Modifies Temperature
- √ Improves Soil Condition & Controls Erosion

**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. Do not stack more than two pallets high. Do not store near open containers of fertilizer, seed or other pesticides.

**PESTICIDE DISPOSAL:** If container is damaged or if pesticide has leaked, clean up all spilled material. Improper disposal of excess pesticide, spray mixtures or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, or offered to others for their use, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay away from smoke.

**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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If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

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OPTIONAL MARKETING STATEMENTS

NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. Chlorine declaration and fertilizer guarantee are optional except where mandated by State fertilizer regulation.