

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

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p and
2, 4-DP to 2, 4-DP-p
Riverdale Sweet Sixteen Weed And Feed
EPA Registration Number: 228-184
Your Correspondence Letter
Dated July 30, 1999

OCT 28 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 ingredient mecoprop and 2, 4-DP from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof and (2, 4-dichlorophenoxy)propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof and (+)-R-2-(2, 4-dichlorophenoxy)propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement(s) 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 Statement(s) of Formula (CSF) 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 form of mecoprop and 2, 4-DP. The product containing the racemic forms must bear the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (Basic, Alternate #1, and Alternate #2 Formulation, dated 04/12/99) has been placed in the Agency's file for the subject product. This basic CSF supersedes all previously submitted CSFs for this product.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	MHoward							
DATE ▶	Oct 27, 1999							

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

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

Enclosure

RIVERDALE
SWEET SIXTEEN WEED AND FEED
WITH TRIAMINE™

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) 5,000 Sq. Ft. (50' x 100')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	0.425%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.212%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	0.209%
INERT INGREDIENTS:	99.154%
TOTAL	100.000%

ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2,4-Dichlorophenoxyacetic Acid	0.350%
** (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.175%
*** (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	0.175%

†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 ₂ O ₅)	X%
Soluble Potash (K ₂ 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.

†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 16 LBS.

EPA REG. NO. 228-184

EST NO. 228-IL-1

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 28 1999

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

228-184

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, shoes and gloves when loading and 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, nor pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

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

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.

SWEET SIXTEEN WEED AND FEED WITH TRIAMINE™ is a stable mixture of three herbicides. It is for use on Lawns, Ornamental Turf (not pastures), Parks, and Golf Fairways, Aprons, Tees and Roughs.

This product may be used on Bahia, common Bermuda, Bluegrass, 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:

Alders, Artichoke, Aster, Austrian fieldcress, Beggarticks, Bidden, 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 sow-thistle, 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, Heartloaf 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, Pennygrass, 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, Spanish-needles, Spatterdock, Speedwell, Spurge, Spurweed, Stinkweed, Stitchwort, Sumac, Sunflower, Sweet clover, Tarweed, Thistle, Toadflax, Tumbleweed, Velvet leaf, Veronica, Vervain, Vetch, Virginia buttonweed, Virginia creeper, White Clover, 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 broad-leaf 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 16 pound bag should be used on 5000 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 3.2 pounds per 1000 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 sq. ft. and adjust to apply at the rate of .8 lb. per 250 sq. ft. Clean spreader thoroughly after use.

SPREADER SETTINGS

ONE PASS APPLICATION:

MAKE	SETTING
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

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: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Do not stack more than two pallets high. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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 and may contaminate groundwater. 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: 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.

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 041299)

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.

OPTIONAL FERTILIZER STATEMENTS

NITROGEN

For a lush green lawn

PHOSPHORUS

Improves root growth

POTASSIUM

Vital for growth & drought resistance

RIVERDALE

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X% Urea Nitrogen	
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Under the Federal Insecticide,
Fungicide, and Rodenticide Act
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228-184

8/10

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ONE PASS APPLICATION:°

<u>MAKE</u>	<u>SETTING</u>
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Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

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 041299)

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10/10

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