

Reg # 228-185 - PM-23

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C H E M I C A L C O M P A N Y

OFFICE: 425 WEST 194th STREET, GLENWOOD, IL 60425-1584
PLANT: 220 EAST 17th STREET, CHICAGO HEIGHTS, IL 60411-3699

June 3, 1993

Document Processing Desk (Notification)
Registration Division - H7505C
U. S. Environmental Protection Agency
401 M Street S.W.
Washington, DC 20460


Dear Sir/Madam:

Subject: PR Notice 93-3 dated March 9, 1993
Riverdale Weedestroy^(R) Tri-EsterTM
EPA Reg. No. 228-185
OPP Identifier No. 196203

Please find enclosed the necessary paperwork to notify the Agency that we are revising our label in accordance with the above subject PR Notice. If there is anything else we should do at this time, please contact us immediately.

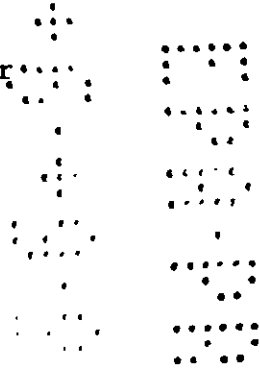
Sincerely yours,

RIVERDALE CHEMICAL COMPANY


By Russell F. Sawyer
Regulatory Affairs Manager

RFS:ls

Enc.



(A)	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number 196203
	Application for Pesticide:		

Section I

1. Company/Product Number 228-185	2. EPA Product Manager Joanne I. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Riverdale Weedestroy ^R Tri-Ester TM	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Riverdale Chemical Company 425 W. 194th Street Glenwood, IL 60425-1584 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section II

<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

To Comply with PR Notice 93-3

**NOTIFICATION
 LABEL NOT REVIEWED
 PER PR NOTICE 93-3**
 DATE: 7/1/93

Section III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No * Certification must be submitted.	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container If "Yes," Unit Package wgt. No. per container If "Yes," Package wgt. No. per container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner In Which Label Is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other (_____) <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Russell F. Sawyer	Title Regulatory Affairs Mgr.	Telephone No. (Include Area Code) (708) 754-3330

Certification		6. Date Application Received (Stamped)
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 	3. Title Regulatory Affairs Manager	
4. Typed Name Russell F. Sawyer	5. Date June 3, 1993	

RIVERDALE
 WEDESTROY^(R)
 TRI-ESTERTM

A THREE-WAY POST-EMERGENT SELECTIVE BROADLEAF HERBICIDE CONTAINING THE ESTERS OF 2,4-D, MECOPROP AND DICHLORPROP. FOR USE ON GOLF COURSES, PARKS, HIGHWAYS, SOD FARMS, ORNAMENTAL TURF LAWNS AND SIMILAR NON-CROP AREAS. KILLS DANDELIONS, CHICKWEEDS, PLANTAINS, OXALIS, SPURGE AND MANY OTHER BROADLEAF WEEDS, SOME OF WHICH ARE LISTED ON THIS LABEL.

ONE GALLON COVERS UP TO 4 ACRES

ACTIVE INGREDIENTS:

Isooctyl (2-ethylhexyl) Ester of 2,4-Dichlorophenoxyacetic Acid*	23.99%
Isooctyl (2-ethylhexyl) Ester of 2-(2-Methyl-4-Chlorophenoxy) propionic Acid**	24.41%
Isooctyl (2-ethylhexyl) Ester of 2-(2,4-Dichlorophenoxy) propionic Acid***	33.54%
INERT INGREDIENTS:	18.06%
TOTAL	100.00%

By Isomer Specific Assay AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	15.9%, 1.4 lbs./gal.
**2-(2-Methyl-4-Chlorophenoxy)propionic Acid	15.9%, 1.4 lbs./gal.
***2-(2,4-Dichlorophenoxy)propionic Acid	22.7%, 2.0 lbs./gal.

Weedestroy^(R) and Tri-EsterTM are Trademarks of Riverdale Chemical Company
 Patent Pending

KEEP OUT OF REACH OF CHILDREN

CAUTION - CAUCION

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqeta le haya sido explicada ampliamente.

SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS GALS.

EPA REG. NO. 228-185

EPA EST. NO. 228-185

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

NOTE: Spanish language is optional

Revised A/O 3/9/93

**NOTIFICATION
 LABEL NOT REVIEWED
 PER FR NOTICE 89-6**

DATE. 7/1/93

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing vapor or spray mist. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear long pants, long-sleeved shirt, socks, shoes and chemical resistant gloves when mixing, loading or applying this product. Wash nondisposable gloves thoroughly with soap and water before removing. Commercial mixer/loaders must also wear these clothes, except when product is to be applied to golf courses. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. The maximum number of broadcast applications to turf 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 spray has dried.

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, then a mechanical system (probe and pump) 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.

Please see additional Precautionary Statements in Directions For Use instructions.

STATEMENT OF PRACTICAL TREATMENT

- IF SWALLOWED: Call a physician or Poison Control Center. DO NOT induce vomiting or give anything by mouth to an unconscious person.
- IF ON SKIN: Wash thoroughly with plenty of soap and water. Get Medical Attention.
- IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. For terrestrial uses, 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 washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes. If spill occurs, collect the material and dispose of by following disposal instructions on this label.

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.

CAUTION
DO NOT MIX WITH OTHER PESTICIDES
OR FERTILIZERS

© 1984 DOW CHEMICAL COMPANY

PHYSICAL OR CHEMICAL HAZARDS

Do not use or 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. **READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.**

GENERAL INFORMATION

WEDESTROY TRI-ESTER is a stable solution containing a mixture of three herbicides. It is for use on Lawns, Turf (not pastures) and Golf Fairways, Aprons, Tees and Roughs, Parks, Sod Farms, Cemeteries, along Highways, Rights-of-Way, and other similar non-crop areas. Maximum kill of weeds will be obtained by applying in Spring and early Fall when weeds are actively growing.

ADDITIONAL PRECAUTIONS FOR SOD FARM AND INDUSTRIAL APPLICATIONS

When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear face shield or goggles and chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required. Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands, face and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. There isn't any restriction on the annual maximum number of broadcast applications for Sod Farm nor Industrial uses. Do not enter or allow Sod Farm worker entry into treated areas during the restricted-entry interval of 12 hours. No re-entry restrictions for Industrial uses.

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 carpetgrass, dichondra, nor on grasses where desirable clovers are present. 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. Use higher rate when using higher volume of water per acre. Do not exceed specified application dosages for any area. Do not apply to newly seeded grasses until well established. Spray when air temperature is between 50°-85°F. Avoid applying during excessively dry or hot periods unless irrigation is used before treatment. For optimum results: (1) turf should not be mowed for 1 to 2 days before and following application; (2) do not apply if rainfall is expected within 48 hours, nor should lawn be irrigated (watered) for 48 hours following application. Reseed no sooner than 3 to 4 weeks after application of this product. Adding oil, wetting agent, or other surfactant to the spray may be used to increase effectiveness on weeds but doing so may reduce selectivity to turf resulting in turf damage. Clean and rinse spray equipment using soap or detergent and water and rinse thoroughly before reuse for other sprays. Failure to

observe above precautions may result in turf injury.

WEEDS CONTROLLED BY TRI-ESTER™

Alders, Artichoke, Aster, Austrian fieldcress, Beggarticks, Bide, 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, 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, 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, Spanishneedles, 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.

PREPARATION OF THE SPRAY

Add one-half the required amount of water to spray tank, then add this product with agitation and finally balance of water with continued agitation. This material forms an emulsion in water-not a solution. This tends to separate on standing. Provide agitation to prevent such separation and insure a uniform mixture.

ORNAMENTAL LAWNS AND TURF

Cool Season Grasses - such as blue grass, fescue, and ryegrass:

Apply Weedestroy Tri-Ester at a rate of 2-3 pts per acre in sufficient water for good coverage, 20-260 gallons of water per acre (3/4 - 1.1 ounces in 1-6 gallons of water per 1000 square feet). For hard-to-kill weeds, such as wild onion, speedwell, henbit and nettle, use 1.5 ounces in 1-6 gallons of water per 1000 square feet.

Warm Season Grasses - St. Augustine, bahia, common Bermuda, centipede and zoysia:

Apply Weedestroy Tri-Ester at maximum rate of 1-1/2 - 2 pints in up to 150 gallons of water per acre (.55-3/4 oz. in 3 gallons of water per 1000 square feet). Do not spray St. Augustine, common Bermuda or centipede grasses if stressed from heat, drought, etc. Slight turf yellowing should disappear after about 1 week. When treating Bermuda for hard-to-kill weeds, such as wild onion, speedwell, henbit, and nettle, use 1.5 ounces in 1-6 gallons of water per 1000 square feet. Exercise care when applying during growth stages from dormancy to green-up and from green-up to dormancy. Note: Some hybrid Bermuda grasses may be sensitive to this product. Contact your local extension service weed control specialist.

Bentgrass Turf: On closely mowed bentgrass, other than golf course greens and tees, apply Weedestroy Tri-Ester at maximum rate of 2/3 oz. in 3 gallons water per 1000 sq. ft. (1-3/4

pints per acre) in May or mid-August through September when weeds are actively growing. Exercise care to avoid over-dosing bentgrass or injury may result. Slight turf yellowing should disappear after about 1 week. Do not spray if grass is under stress conditions.

Low Volume Applicator: When using a Low Volume Applicator (such as Lawn Doctor's "Turf Tamer") on above listed grasses use Weedestroy Tri-Ester at a rate of 2-3 pints per acre (.75 oz.-1.1 oz. in 1/2 gal. water per 1000 sq. ft.).

Herbi™ Controlled Droplet Applicator: On Cool Season Grasses - Add 2 pints of Weedestroy Tri-Ester to the 5 pint Herbi bottle, then fill with 3 pints of water or 2-1/2 pints of water and 1/2 pint of surfactant while agitating the solution. For warm season grasses - use 1-1/2 pints of Tri-Ester with 3-1/2 pints of water. While walking at approximately 1 pace (3 feet) per second; spray entire spray contents over 33,000 square feet (3/4 of an acre). Do not overlap (double coverage) at edge of patterns. Reduced rates of Weedestroy Tri-Ester (1/2 of rate shown above) must be used when grass is stressed from heat, drought, etc.

Herbi™ is a trademark of North American Micron.

Roadsides (including aprons and guard rails) rights-of-way, drainage ditchbanks, and other similar non-crop areas: For control of broadleaf weeds, mix at a rate of 1/2-1 gallon of Weedestroy Tri-Ester per 100-300 gallons of water. This mixture will cover 43,500 sq. ft. Thoroughly saturate all weeds with spray mixture. Apply when plants come into full leaf (Spring) to the time plants begin to go dormant. Best results are obtained when weeds are young and actively growing. Do not cut weeds until herbicide has translocated throughout the plant causing root death. For small broadleaf weeds use the lower rate. Heavy, dense stands require the higher rate with high water volume. For small (spot) applications with small tank sprayers use at the rate of 1-1/2 ounces Weedestroy Tri-Ester per gallon of water and spray to thoroughly wet all foliage.

For control of woody plants, apply to both stems and foliage from the time foliage is completely matured until the plants start to go dormant. All leaves, stems and suckers must be completely wet to the ground line for effective control. Regrowth may be anticipated on the more resistant species. Add 1 - 1-1/2 gallons of Weedestroy Tri-Ester to 100 gallons of water using 200-600 gallons of spray mixture per 43,500 sq. ft. depending upon the height and thickness of the brush. Mix thoroughly before spraying.

STORAGE AND DISPOSAL

STORAGE: Always store pesticides in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Containers should be opened in well ventilated areas. Keep container tightly sealed when not in use. Do not stack cardboard cases 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, 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 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: Triple rinse (or equivalent). 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 also disposable by incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

Local conditions may affect the uses of this chemical as shown on this label. Consult State Experiment Station or Extension Service weed specialist for specific recommendations for local weed problems and for information on possible lower dosages.

WARRANTY

Riverdale Chemical Company warrants that this herbicide conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this herbicide is reasonably fit for its intended purposes. Since timing, method of application, weather, plant, and soil conditions, mixture with other chemicals, and other factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

(ERP 102393) (PR933 042194)