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

16 1993

**Russell F. Sawyer  
RIVERDALE CHEMICAL CO.  
425 West 194th Street  
Glenwood, IL 60425**

**OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES**

**SUBJECT: Label Amendment Submission of 08/17/93 in Response to PR Notice 93-7  
EPA Reg. No. 228-185  
RIVERDALE WEEDSTROY TRI-ESTER**

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE PRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1) of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stamped-accepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.

Sincerely,

*James Tompkins*  
**James Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)**

Enclosures

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Russell F Sawyer  
RIVERDALE CHEMICAL CO  
425 WEST 194TH ST.  
GLENWOOD IL 60425

Subject: Label Amendment Submission of 08/17/93  
in Compliance with the PR Notice 93-7  
EPA Reg Nr. 228-185  
RIVERDALE WEEDSTROY TRI-ESTER

Modify the exclusionary statement to conform to the EPA-  
approved language specified in PRN 93-11.

2018

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

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

RIVERDALE  
TRI-ESTER™

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, 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.

Tri-Ester™ is a Trademark of Riverdale Chemical Company

Patent Pending

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION - CAUCION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

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

NET CONTENTS      GALS.

EPA REG. NO. 228-185

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS      60425-1584

NOTE: Spanish language is optional

Revised A/O 4/20/93

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

**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**

TRI-ESTER is a stable solution containing a mixture of three herbicides. It is for use on Lawns, Turf (excluding pastures, sod farms and turf grown to produce seed) and Golf Fairways, Aprons, Tees and Roughs, Parks, 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 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 Industrial uses. 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 lawns 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.

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**WEEDS CONTROLLED BY TRI-ESTER™**

Alders, Artichoke, Aster, Austrian fieldcress, Beggarticks, Biden, 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 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 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 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 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 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 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 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 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 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) (PR937&8 042194)