UNITED S.A. ES ENVIRONMENTAL PROTECTION AUL.ICY

JUL 29 1994

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

Dear Mr. Sawyer:

SUBJECT: Riverdale Weedestroy (R) Tri-Ester (TM) II

Label Amendment

EPA Registration No. 228-205

Your Submission Dated June 3, 1993

The Agency has reviewed your request to delete the sentence regarding the cleaning of gloves. The labeling submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comment:

1. We have noted that you are referring to the product as Tri-Ester (TM) II. The product is registered with the Agency as Weedestroy (R) Tri-Ester (TM) II. If you want to request a product name change, please submit an application along with five (5) draft labelings. Until the Agency has approved a product name change, continue to use Riverdale Weedestroy (R) Tri-Ester (TM) II in correspondence to the Agency.

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label incorporating the above change, before releasing this product for shipment.

Sincerely yours,

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

	CONCURRENCES	\$	
SYMBOL 7525C			
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DATE 1/28/94		· · · · · · · · · · · · · · · · · · ·	
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EPA Form 1320-1A (1/90) Printed on Recycled Paper

*U.S. Government Printing Office: 1992 — 620 856/40672

RIVERDALE

Variation TRI-ESTER™ II ✓

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

ONE GALLON COVERS UP TO 4 ACRES

ACTIVE INGREDIENTS: Isooctyl (2-ethylhexyl) Ester of 2-Methyl-4-Chlorophenoxyacetic Acid* Isooctyl (2-ethylhexyl) Ester of 2-(2-Methyl-4-Chlorophenoxy)propionic Acid** Isooctyl (2-ethylhexyl) Ester of 2-(2,4-Dichlorophenoxy)propionic Acid** INERT INGREDIENTS:			
Isomer Specific AOAC Method, Equivalent to: *2-Methyl-4-Chlorophenoxyacetic Acid			
Tri-Ester™ is a Trademark of Riverdale Chemical Company. Patent Pending.	,		

KERP OUT OF REACH OF CHILDREN

WARNING -

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

EPA REG. NO. 228-205

EPA EST. NO. 228-IL-1

NET CONTENTS GALS.

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

ACCEPTED

JH 29 1994

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Revised A/O 12/22/93

IF IN EYES:

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if absorbed through skin. This product may cause allergic reactions in certain individuals. Harmful if swallowed or inhaled. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes or clothing. Wear face shield or goggles when mixing, loading or applying this product. Remove contaminated clothing and wash before reuse.

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.

Immediately flush eyes with plenty of water for 15 minutes and get-

Medical Attention at once.

ENVIRONMENTAL PAZARDS

Drift or runoff may adversely affect 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 or rinsate 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.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA, Mecoprop and Dichlorprop 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 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. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

GENERAL INFORMATION

TRI-ESTER II 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 Fail when weeds are actively growing.

USE PRECAUTIONS

CARE MUST BE TAKEN TO AVOID DRIFT OF SPRAY MISTS TO NON-TARGET susceptible plants such as cotton, regetables, 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. Except as noted, use a lawn type sprayer with a coarse

Page 3

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. 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. For optimum results, (1) turf should not be mowed 1 to 2 day 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 the above precautions may result in injury to turf and other desirable vegetation.

WEEDS CONTROLLED BY TRI-ESTER™ II

Alders, Beggarticks, Bindweed, Black medic, Blue lettuce, Buckhorn, Burcucumber, Burdock, Buttercup, Canada thistle, Carpetweed, Catsear, Chervil, Chickweed, Chicory, Clover, Cocklebur, Croton, Dandelion, Dock, Dogfennel, Dragonhead mint, Dwarf nettle, English daisy, Fanweed, Fat hen, Field bindweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Halbertleaved salt bush, Hawkweed, Healall, Heartloaf drymary, Hempnettle, Henbit, Hoary cress, Honeysuckle, Jimsonweed, Kochia, Knotweed, Lambsquarters, Mallow, Marshelder, Mexican poppy, Minerslettuce, Moneywort, Morningglory, Mustard, Nutgrass, Oxalis, Pennycress, Pennywort, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Prickly lettuce, Puncture vine, Purslane, Ragweed, Red clover, Red root, Red sorrel, Red stem, Sagebrush, Sheep sorrel, Shepherdspurse, Sicklepod, Smartweed, Sneezeweed, Sowthistle, Spanishneedles, Speedwell, Spurge, Spurweed, Stinging nettle, Stinkweed, Stitchwort, Sunflower, Sweet clover, Thornapple, Toadflax, Tree-of-heaven, Velvet leaf, Veronica, Vetch, Violet, Virginia buttonweed, Wild aster, Wild carrot, Wild garlic, Wild geranium, Wild gooseberry, Wild jute, Wild lettuce, Wild marigold, Wild petunia, Wild onion, Wild radish, Wild sage, Wild strawberry, Willow, Witchweed, Woodsorrel, Yarrow, Yellow charlock-mustard, Yellow daisy, Yellow rocket, and other broadleaf weeds.

PREPARATION OF THE SPRAY

Add one-half the required amount of water to the spray tank, then add this product with agitation and finally the balance of the 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 ensure a uniform mixture.

ORNAMENTAL LAWNS AND TURF

Cool Season Grasses - such as bluegrass, fescue, and ryegrass: For normal application, use Tri-Ester II at a rate of 2-4 pints per acre in sufficient water for good coverage, 20-200 gallons of water per acre (3/4 - 1.4 ounces in 1-6 gallons of water per 1000 square feet is normal).

Warm Season Grasses - St. Augustine, bahia, common Bermuda, centipede and zoysia: Apply Tri-Ester II at a maximum rate of 2-3 pints in up to 150 gallons of water per agre (2/3 - 1-1/3 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 turk yellowing should disappear after about 1 week. Exercise care when applying during growch 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

Bentgrass Turf: On closely moved bentgrass - other than golf course greens and tees, apply Tri-Ester II at a maximum rate of 2/3 ounce in 3 gallons water par 1000 square feet (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. Clight turf yellowing should disappear after about 1 week. Do not spray if grass is under stress conditions.

extension service weed control specialist.

Low Volume Applicators: When using a Low Volume Applicator (such as Lawn Doctor's "Turf Tamer") on above listed grasses, use Tri-Ester II at a rate of 2-4 pints per acre (.75 oz.

- 1.5 oz. in 1/2 gallon of water per 1000 sq. ft.)

Herbi[®] Controlled Droplet Applicator: On cool season grasses - add 2 pints of Tri-Ester II 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 a surfactant while agitating the solution. For warm season grasses, use 1-1/2 pints of Tri-Ester II with 3-1/2 pints of water. While walking at approximately 1 pace (3 feet) per second, spray entire contents over 33,000 square feet (3/4 of an acre). Do not overlap (double coverage) at edge of spray patterns.

When using either Low Volume or Controlled Droplet application on cool season grasses, reduced rates of Tri-Ester II (1/2 of rate shown above) must be used when grass is stressed from heat, drought, etc.

Roadsides (including aprons and guard rails) rights-of-way, and other similar non-crop areas: For the control of broadleaf weeds, mix at a rate of 1/3 - 1 gallon of Tri-Ester II per 50-100 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 high rate with high water volume. For small (spot) applications with small tank sprayers, use at the rate of 1 - 1-1/2 ounces Tri-Ester II 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 II 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.

Herbi™ is a trademark of North American Micron.

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 area. 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: 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. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. 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 are 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 use of this chemical as shown on this label. Consult State Experimental Station or Extension Service weed specialist for specific recommendations for local weed problems and for information on possible lower dosages.

WARRANTY

Riverdale 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, mixtures with other chemicals, and factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this

Riverdale Tri-Ester™ II

product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

(RS 03191) (PR938 042194/RV 122293)