

Russell F. Sawyer  
 Riverdale Chemical Company  
 425 West 194<sup>th</sup> Street  
 Glenwood, IL 60425-1584

DEC 23 1998

Dear Mr. Sawyer:

Subject: Conversion from 2,4-DP and MCPP to 2,4-DP-p and MCPP-p  
 Riverdale Triamine II  
 EPA Registration No. 228-206  
 Your Submission Dated October 28, 1998

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 ingredients, dichlorprop and mecoprop, from their racemic forms [2-(2,4-dichlorophenoxy) propionic acid and 2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salts thereof] to their single isomer forms [(+)-R-2-(2,4-dichlorophenoxy) propionic acid and (+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salts thereof]. The revised labeling and Confidential Statements 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 Statements of Formula (CSFs) 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 forms of dichlorprop and mecoprop, or applicable salts thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised Confidential Statements of Formula (Basic Formulation and Alternate Formulations #1 and #2, all dated October 28, 1998) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

DK:305-7546:HB/PM23

CONCURRENCES

SYMBOL	7505C							
SURNAME	D. KENNY							
DATE	12/23/98							

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A stamped copy of the labeling is enclosed for your records. Submit one 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

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RIVERDALE

TRIAMINE™ II

A THREE-WAY POST-EMERGENT SELECTIVE BROADLEAF HERBICIDE CONTAINING THE AMINES OF MCPA, MECOPROP-p AND DICHLORPROP-p.

FOR USE ON GOLF COURSES, PARKS, HIGHWAYS, ORNAMENTAL TURF LAWNS AND SIMILAR NON-CROP AREAS. CONTROLS DANDELIONS, CHICKWEEDS, PLANTAINS, OXALIS, SPURGE AND MANY OTHER BROADLEAF WEEDS, SOME OF WHICH ARE LISTED ON THIS LABEL.

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	17.15%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	8.47%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	8.34%
INERT INGREDIENTS:	66.04%
TOTAL	100.00%

Isomer Specific Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	14.0%	1.27 lbs./gal.
** (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	07.0%	0.63 lbs./gal.
*** (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	07.0%	0.63 lbs./gal.

† CONTAINS THE SINGLE ISOMER FORMS OF MECOPROP-p AND DICHLORPROP-p.

Triamine™ and THE OPTICAL ADVANTAGE™ are Trademarks of Riverdale Chemical Company Patent Pending

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

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

EPA REG. NO. 228-206

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

NOTE: Spanish language is optional

**ACCEPTED**

DEC 23 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 228-206

Revised 10/28/98 Converted MCPP & 2,4-DP to Optical Isomers.

(Inside Booklet)

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

Corrosive, causes irreversible eye damage. Harmful or fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist. Do not get in eyes, or on clothing. Wear goggles or face shield when mixing or loading. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**STATEMENT OF PRACTICAL TREATMENT**

**IF IN EYES:** Flush with plenty of water. Call a physician.  
**IF SWALLOWED:** Drink promptly a large quantity of milk, egg whites or gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.  
**IF ON SKIN:** Flush with plenty of water. Get medical attention.  
**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

**ENVIRONMENTAL HAZARDS**

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, 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.

**GENERAL INFORMATION**

TRIAMINE™ II is a stable solution containing a mixture of three herbicides. It is non-flammable. It is for use on Lawns, Turf, Golf Fairways, Aprons, Tees and Roughs, Parks, Cemeteries, along Highways, Rights-of-Way, and other similar non-crop areas. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

**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. Except as noted, use a lawn type sprayer with a coarse spray as wind drift is less likely. Avoid fine mists. Do not spray exposed roots of desirable plants. Maximum control of weeds will be obtained by applying in Spring and early Fall when weeds are actively growing. 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. Do not spray when air temperature exceeds 90°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 days before and following application; (2) 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.

Triamine II can be mixed with some liquid fertilizers or liquid iron materials. Because liquid fertilizers and liquid iron differ in pH, free ammonia content, density, salt concentration, and percentage of water, a compatibility test is recommended prior to mixing in the application equipment. All regulations, either State or Federal, relating to the application of liquid fertilizers or liquid iron and this product, must be strictly followed.

#### WEEDS CONTROLLED BY TRIAMINE™ II

Alder, Beggartick, 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, Heartleaf drymary, Hempnettle, Henbit, Hoary cress, Honeysuckle, Jimsonweed, Kochia, Knotweed, Lambsquarter, 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, Sheep sorrel, Shepherdspurse, Smartweed, Sneezeweed, Sowthistle, Spanishneedle, 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 onion, Wild petunia, Wild radish, Wild sage, Wild strawberry, Willow, Witchweed, Woodsorrel, Yarrow, Yellow charlock-mustard, Yellow daisy, Yellow rocket, and other broadleaf weeds.

#### ORNAMENTAL LAWNS AND TURF

**Cool Season Grasses - such as Bluegrass, Fescue, and Rye:** Apply Triamine II at a rate of 3 to 4 pints per acre in sufficient water for good coverage, 40 to 80 gallons of water per acre (1 to 2 gallons of water per 1,000 square feet is normal). For small lawns, use 5 to 7 teaspoons in 1 gallon of water per 1,000 square feet.

**Warm Season Grasses - St. Augustine, Bahia, Bermuda, Centipede and Zoysia:** Apply Triamine II at a maximum rate of 2 to 3 pints in up to 150 gallons of water per acre (2/3 to 1-1/3 ounces in 3 gallons of water per 1,000 square feet). Do not spray St. Augustine, Bermuda or centipede grasses if stressed from heat, drought, etc. Slight turf yellowing should disappear after about 1 week. 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 Triamine II at a maximum rate of 2/3 ounce in 3 gallons of water per 1,000 square feet (1-3/4 pints per acre) in May or mid-August through September when weeds are actively growing. Exercise care to avoid overdosing bentgrass or injury may result. Slight turf yellowing should disappear after about 1 week.

**Low Volume Applicators:** When using a Low Volume Applicator (such as Lawn Doctor's "Turf Tamer"), use Triamine II at a rate of 3 to 4 pints per acre (1.1 to 1.5 ounces in 1/2 gallon of water per 1,000 square feet).

**Herbi™ Controlled Droplet Applicator:** Add 2 pints of Triamine 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 Triamine 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. Reduced rates (use 1/2 of rate shown above) of Triamine II must be used when grass is stressed from heat, drought, etc.

Herbi™ is a trademark of North American Micron.

**Similar Non-Crop Areas**

**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 to 1 gallon of Triamine II per 50 to 300 gallons of water. This mixture will cover 43,500 square feet. 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 higher water volume. For small (spot) applications with small tank sprayers, use at the rate of 4 ounces of Triamine 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 to 1-1/2 gallons of Triamine II to 100 gallons of water using 200 to 600 gallons of spray mixture per 43,500 square feet depending upon the height and thickness of the brush. Mix thoroughly before spraying.

**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. Store at temperatures above 32°F. If allowed to freeze, remix before using. This does not alter this product. 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:** Pesticide wastes are acutely hazardous. 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. 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 are also disposable by incineration, or if allowed by State and local, authorities by burning. If burned, stay out of smoke.

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

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