



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 17 2005

Theodore Head
Nufarm Americas, Inc.
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527-0866

Dear Mr. Head:

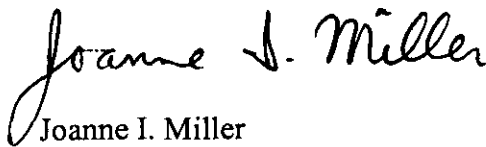
Subject: Conversion from 2,4-DP and MCPP to 2,4-DP-p and MCPP-p
Riverdale Triamine Premium Liquid Weed and Feed
EPA Registration Number: 228-210
Your Submission Dated February 17, 2005

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 (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 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 and Alternate Formulations, dated 02/17/05) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product. 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

(Residential Label)

RIVERDALE*

TRIAMINE* PREMIUM LIQUID
WEED AND FEED

LIQUID LAWN CARE

READY-TO-USE

3 8 7
ACCEPTED

MAY 17 2005

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

228-210

NO MIXING REQUIRED WHEN USED WITH A HOSE-END
SPRAYER ON GRASS AND ORNAMENTAL TURF (TURF GRASS LAWNS)

Just Connect Hose, Turn of Water, and Spray

Gives your lawn a quick boost of important nutrients while controlling
broadleaf weeds. Read directions for different grasses
and methods of application.

TREATS (OR COVERS) 5,000 TO 7,500 SQ. FT.
CONTAINS 2,4-D, MECOPROP-p AND DICHLORPROP-p AND A X-X-X FERTILIZER

GET THE OPTICAL ADVANTAGE*

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	1.625%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.817%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	0.805%
INERT INGREDIENTS:	96.753%
TOTAL	100.00%

Isomer Specific Method, Equivalent to

*2,4-Dichlorophenoxyacetic Acid	1.350%	0.130 lbs./gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.675%	0.065 lbs./gal.
***(+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	0.675%	0.065 lbs./gal.

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

GUARANTEED ANALYSIS:*

Total Nitrogen (N) X%

X% Urea Nitrogen

Fertilizer guaranteed by (Name of Fertilizer registrant).

Riverdale, Triamine and The Optical Advantage are Registered Trademarks of Nufarm Americas Inc.

KEEP OUT OF REACH OF CHILDREN

CAUTION

**SEE SIDE AND BACK PANELS FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS**

NET CONTENTS: 1/2 GAL. (64 Fl. Oz.)

NET WEIGHT: 4.69 LBS.

EPA REG. NO. 228-210

EPA EST. NO. 228-IL-1

MANUFACTURED BY NUFARM AMERICAS INC., BURR RIDGE, ILLINOIS 60527-0866

- Revised 1/31/03 Changed First Aid Statement per PR 2001-1 and Disposal Statement per PR 2001-6 via Amendment.
- 1/13/04 Corrected the Disposal Statement via Notification.
- 4/29/04 Converted Mecoprop and Dichlorprop to Optical Isomer via Amendment.
- 2/17/05 Resubmitted label and CSF in accordance with EPA letter dated Nov-22-04

(Side Panels)

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

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear long pants, long-sleeved shirt, socks, shoes and chemical resistant gloves when handling or applying this product. After using this product, wash non-disposable gloves thoroughly with soap and water before removing, 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 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.

FIRST AID STATEMENT

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

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. Do not contaminate water when disposing of equipment washwaters nor pour the washwaters on the ground; spray or drain over a large area away from wells, other water sources and desirable plants. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes. If spills occur, collect the material and dispose of by following disposal instructions on this label.

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.

Spray any time during the growing season when weeds are actively growing (except as noted for S-Southern or Warm Season grasses).

5,000 Sq. Ft.

Coverage for (N-Northern or Cool Season grasses) such as Bluegrass, Fescue, and Rye grasses

7,500 Sq. Ft.

Coverage for (S-Southern or Warm Season grasses) Bahia, common Bermuda, St. Augustine, Centipede, Zoysia, and Bent grasses. Some temporary injury may occur with these grasses. In Spring, do not apply until grass has reached full green-up. In Fall, exercise care

when grass growth is going into dormancy. When applying to Bent grass, height of grass should be 1-1/2" or more. Note: Some hybrid Bermuda grasses may be sensitive to this product. Contact your local Extension Service weed control specialist.

Designed to control broadleaf weeds and give your lawn a quick boost of important nutrients. Controls dicot weeds during their active growth period. Guaranteed not to burn your lawn when used as directed. Contains a high analysis fertilizer featuring a patented nitrogen formula.

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing *(No. of lbs.) pounds of nitrogen per 1,000 square feet (optional P₂O₅ and K₂O levels) and Triamine to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

*Based on Inert fertilizer claimed.

USE PRECAUTIONS

IMPORTANT: Do not use this product for controlling weeds in flower or vegetable beds or around shrubs or ornamental plantings. Do not spray exposed roots of desirable plants. Do not spray on Dichondra, Lippia, nor on grasses where desirable Clovers are present. Do not apply to newly seeded grasses until they have been mowed 3 times. Do not cut grass 1 to 2 days before and after application. Do not reseed or plant stolons for 3 to 4 weeks after use. If lawn needs watering, water thoroughly before application. Do not water for 48 hours after application. Watering will wash off weed killing material. Do not apply if rainfall is expected within 48 hours. Avoid fine mists. Use a lawn type sprayer with a coarse spray as wind drift is less likely. Spray entire lawn, wetting weeds and lawn grasses. Do not exceed recommended rates because damage to turf may occur. Spray when air is calm to avoid spray drift that might injure desirable ornamental plants. Do not apply when temperature exceeds 85°F. Shake well before using.

WEEDS CONTROLLED BY TRIAMINE® PREMIUM LIQUID WEED AND FEED

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 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, Heartleaf 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, 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.

After applying this product, many broadleaf weeds will begin to show visible signs of leaf curl within a few days. Some hard-to-control broadleaf weeds may require a second treatment in 3 to 4 weeks.

(HOSE-END SPRAYER INSTRUCTIONS)

W TO APPLY: Use any 32 oz. hose-end sprayer that is designed for use on lawns and makes a minimum of 15 gallons of finished spray. Such sprayers are Ortho's Orthomatic Lawn Sprayer, Ortho's and Black Leaf's Lawn Sprayers (dilution ratio of 60-1). The following are adjustable/dial sprayers:

MANUFACTURER	SETTING
Super K-Gro	20
Melnor #94 & #95	11
Melnor #96 & #97	13
Gilmour #362	4
Gilmour #486	12

SPECIAL NOTE: Some adjustable sprayers do not hold 32 oz. The above settings are based on using 64 oz. per 5,000 or 7,500 sq. ft. The entire contents of this bottle must be used to make the proper recommended application rate.

Determine area to be sprayed. Apply at a rate of 64 oz. (1/2 gal.) per 5,000 square feet on N-Northern or Cool Season grasses, or 7,500 square feet for application on S-Southern or Warm Season grasses. Shake well and fill sprayer jar with appropriate amount of this product. Do not dilute this product with water when filling sprayer jar. The water will automatically mix with this product during spraying. Attach sprayer to garden hose while holding sprayer at waist level. Point in a direction away from face and body. Walk back and forth at a steady pace. Over-lap slightly for uniform coverage.

(DISPOSABLE SPRAYER AND BOTTLE INSTRUCTIONS)

HOW TO APPLY: Connect spray nozzle to hose. Remove bottle cap and screw bottle into nozzle. While holding sprayer at waist level, point in direction away from face and body. Turn on water at the tap. Place finger over hole on right side of nozzle (or turn on/off lever to the "ON" position) and this product will mix automatically at the proper ratio. Walk back and forth at steady pace. Overlap slightly for uniform coverage.

COVERAGE MEASURING GUIDE
(Marks on left for 1/2 gal. disposable bottle.
Not to scale.)

<u>1000 Square Feet</u>	<u>1500 Square Feet</u>
<u>2000 Square Feet</u>	<u>3000 Square Feet</u>
<u>3000 Square Feet</u>	<u>4500 Square Feet</u>
<u>4000 Square Feet</u>	<u>6000 Square Feet</u>
<u>5000 Square Feet</u> Cool Season (N)	<u>7500 Square Feet</u> Warm Season (S)

STORAGE AND DISPOSAL

STORAGE: Keep from freezing. To be stored in original container and placed in an area inaccessible to children. Do not store near open containers of feed or foodstuffs.

DISPOSAL: If empty - Do not reuse this container, except as a hose-end sprayer bottle only when using Riverdale Triamine Premium Liquid Weed and Feed refill size. Place in trash or offer for recycling if available. If partly filled - If product cannot be used as directed call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

