



000228-00211-062199

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Systems Integration Group, Inc.

PM 23

228-211

6-21-99

1 of 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Dear Mr. Sawyer:

JUN 21 1999

Subject: Conversion from MCPP to MCPP-p  
Riverdale Triamine 3-Way Lawn Weed Killer  
EPA Registration Number: 228-211  
Your Submission Dated March 19, 1999

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 ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement(s) 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 Statement(s) 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 form of mecoprop and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (Basic, Alternate #1, and Alternate #2 Formulation, dated 03/19/99) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one (1) 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

CONCURRENCES

SYMBOL >	7505C							
SURNAME >	MHoward							
DATE >	Jun 21, 1999							

RIVERDALE

TRIAMINE™ 3-WAY LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL IN ORNAMENTAL LAWNS AND TURF GRASSES  
And Other Listed Sites

When using a hose-end sprayer, just connect hose,  
turn on water and spray.

ONE QUART COVERS UP TO 10,000 SQUARE FEET  
(See directions for different grasses.)

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	2.28%
✓ Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	1.15%
✓ Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	1.13%
INERT INGREDIENTS:	95.44%
TOTAL	100.00%

Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	1.90%, 0.16 lbs./gal.
✓ ** (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.95%, 0.08 lbs./gal.
✓ *** (+)-R-2-(2,4-Dichlorophenoxy) propionic Acid	0.95%, 0.08 lbs./gal.

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

†TRIAMINE & THE OPTICAL ADVANTAGE™ ARE TRADEMARKS OF RIVERDALE CHEMICAL COMPANY

Patent Pending

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS  
AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS

EPA REG. NO. 228-211

EPA EST. NO. 228-IL-1

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

JUN 21 1999

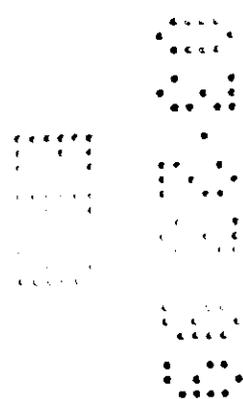
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

228-211

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584



(Side Panels)

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

May be harmful if swallowed. Causes moderate eye irritation. Avoid breathing vapors or spray mist and contact with eyes or clothing. Wear long pants, long-sleeved shirt, socks, shoes and chemical resistant gloves when mixing, loading or applying this product. After using this product, wash nondisposable 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.

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.

**STATEMENT OF PRACTICAL TREATMENT**

- IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.
- IF ON SKIN:** Wash skin with plenty of soap and water. Get medical attention if irritation persists.
- IF SWALLOWED:** Drink one (1) or two (2) glasses of water. Induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

**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 the washwater 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.

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 or 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 3-WAY LAWN WEED KILLER is a stable solution containing a mixture of three herbicides. It is non-flammable. It is for use on Lawns, Ornamental Turf, Parks, Cemeteries, Golf Fairways, Aprons, Tees, Roughs, also along Highways, Rights-of-Way, Drainage Ditch-banks and other similar non-crop areas.

**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 reseed 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 90°F. Make new dilution for each use. Shake well before using.

#### WEEDS CONTROLLED BY TRIAMINE 3-WAY LAWN WEED KILLER

Alders, Artichoke, Aster, Austrian fieldcress, Beggarticks, Bident, 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.

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 (or additional) treatment in 3 to 4 weeks.

#### ORNAMENTAL LAWNS AND TURF

**Cool Season Grasses** - such as bluegrass, fescue, and rye: To kill dandelion, wild onion, pennywort, plantain, healall and similar weeds: use 16 ounces in 6 gallons of water and apply with pump or hose-end sprayer or sprinkling can to 2,500 square feet of lawn. For smaller areas - use 6 teaspoons in 2 quarts of water applied to 100 square feet. For larger areas - use 1 gallon in 50 gallons of water to 1 acre.

To kill undesirable weeds such as thistle, bindweed, dock and ragweed, use 16 ounces in 6 gallons of water (or 6 teaspoonfuls in 2 quarts of water), and apply directly to plants, wetting them thoroughly. Repeat as necessary. For larger areas use 2 gallons in 50 gallons of water.

To kill undesirable plants such as poison ivy and poison oak, use 8 tablespoonfuls in 1 quart of water or 4 gallons in 12-1/2 gallons of water and drench plants when they are fully leaved. Repeat in about 4 weeks if necessary. Certain hard-to-kill weeds such as poison ivy, poison oak and English daisy may require a Fall application.

**Warm Season Grasses** - St. Augustine, Bahia, common Bermuda, Centipede, Zoysia, also for BENT: Use a one-half rate which is 8 ounces in 6 gallons of water to treat 2500 sq. ft. (6 teaspoonfuls in 4 quarts of water applied to 200 square feet). Make two applications 10 days apart. Do not spray grasses if stressed from heat, drought, etc. Slight turf yellowing should disappear after about 1 week.

Note: Some hybrid Bermuda grasses may be sensitive to this product. Contact your local extension service weed control specialist.

**Roadsides** (including aprons and guard rails) rights-of-way, drainage ditchbanks and other similar non-crop areas contained within a residential locale: For control of broadleaf weeds, mix at a rate of 1 to 3-1/4 quarts of Triamine 3-Way Lawn Weed Killer per '5 to 30 gallons of water. This mixture will cover 4350 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 stand require the higher rate with high water volume.

**For Spot Treatment:** Put 6 teaspoons Triamine 3-Way Lawn Weed Killer into an empty quart container with trigger sprayer. Then add 30 oz. tap water. Adjust spray nozzle to give coarse spray. Aim at center of weed and spray to wet. Applicator Cap - Hold applicator

end about 6 inches from surface to be treated and thoroughly wet. To obtain wider coverage raise container. One application should be sufficient. Effects begin to show after a few days and weeds gradually die. A repeat application may be required in 3-4 weeks for hard-to-control weeds.

**DISPOSAL SPRAYER AND BOTTLE INSTRUCTIONS**

Determine area to be sprayed. Apply at a rate of 32 oz. (1 quart) per 5,000 sq. ft. for Cool Season grasses or 10,000 sq. ft. for Warm Season grasses. 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 the water at the tap. Place finger over hole on right side of nozzle (or turn on/off lever to the "ON" position) and the Lawn Weed Killer will mix automatically at the proper ratio. Walk back and forth at steady pace.

1000	Sq. Ft.	2000
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(Marks on left for 1 qt. disposable bottle.  
Not to scale.)

2000	Sq. Ft.	4000
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3000	Sq. Ft.	6000
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4000	Sq. Ft.	8000
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5000	Sq. Ft.	10000
Cool		Warm
Season		Season

**NOTICE**

Buyer assumes all risks of use, storage and handling of this product not in strict accordance with directions given herewith.

(RV 031999)

**STORAGE AND DISPOSAL**

**STORAGE:** To be stored in original container and placed in area inaccessible to children.

**PRODUCT DISPOSAL:** Partially filled container may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Rinse thoroughly before discarding in trash. Do not reuse empty container.