

228-216

6-7-2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 7 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Russell F. Sawyer
Riverdale Chemical Company
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60521-0866

Dear Mr. Sawyer:

Subject: Revised Label
Riverdale Triamine Premium 6666 Liquid Weed and Feed
EPA Registration Number 228-216
Your Letter Dated April 14, 2002

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. EPA has issued PR Notice 2001-1. Update the labeling in accordance with the guidance for the format and content of the First Aid Statements section on pesticide labeling. A copy of the PR Notice is available at the following web site:

http://www.epa.gov/PR_Notices/

We note on the last page there is the heading "First Aid" but none of the required text.

b. The front panel bears the claim "Get the Optical Advantage". Since the labeling does not describe what the Optical Advantage is we are unable to determine if this claim is misleading or not.

c. When the labels are printed assure that inappropriately hyphenated words do not appear on the labeling i.e. "resistant", "maximum" and "desirable". Also, assure that editorial comments i.e. "Optional CLI language" and "Optional Marketing Hype" are removed.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records. If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,



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

Enclosure

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RIVERDALE®

TRIAMINE® PREMIUM 6666

LIQUID WEED AND FEED

LIQUID LAWN CARE
READY-TO-USE

FOR USE WITH A HOSE-END SPRAYER ON GRASS AND ORNAMENTAL TURF (TYPICAL GRASS LAWNS)

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUN 7 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
228-216-012

NO MIXING

TREATS (COVERS) 4,250 TO 10,000 SQ. FT. IN A MATTER OF MINUTES
Read directions for different grasses.

Gives your lawn a quick boost of important nutrients while controlling broadleaf
weeds. Attach to a garden hose-end sprayer, turn on water, and spray.
A Quick and Easy Way to a Quality Lawn.

CONTAINS 2,4-D, MECOPROP, DICHLORPROP AND A X-X-X FERTILIZER

GET THE OPTICAL ADVANTAGE®

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	2.29%
Dimethylamine Salt of 2-(2-Methyl-4-Chlorophenoxy)propionic Acid**	2.30%
Dimethylamine Salt of 2-(2,4-Dichlorophenoxy)propionic Acid***	2.26%
INERT INGREDIENTS:	93.15%
TOTAL	100.00%

Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	1.9%, 0.18 lb(s)/gal.
**2-(2-Methyl-4-Chlorophenoxy)propionic Acid	1.9%, 0.18 lb(s)/gal.
***2-(2,4-Dichlorophenoxy)propionic Acid	1.9%, 0.18 lb(s)/gal.

GUARANTEED ANALYSIS:°

Total Nitrogen (N)	X%
X% Urea Nitrogen	

RIVERDALE, TRIAMINE & THE OPTICAL ADVANTAGE ARE REGISTERED TRADEMARKS OF RIVERDALE CHEMICAL COMPANY

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE AND BACK PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT

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

NET WEIGHT:° 4.6 LBS.

EPA REG. NO. 228-216

EPA EST. NO. 228-IL-1

MANUFACTURED BY
RIVERDALE CHEMICAL COMPANY
BURR RIDGE, ILLINOIS 60527-0866

(Back Panel)

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.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention
IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.
IF ON SKIN: Wash with plenty of soap and water. If irritation develops, get medical attention.

(OPTIONAL: In case of emergency involving this product call collect day or night, XXX-XXX-XXXX.)

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 anytime during the growing season when weeds are actively growing (except as noted for S-Southern or Warm Season Grasses).

4,150 to 6,666 Sq. Ft. Coverage for (N-Northern or Cool Season Grasses) such as Blue Grass, Fescue, and Rye grasses.

8,500 to 10,000 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.

(Optional Statement: Do not use on Floratam or other improved varieties of St. Augustine grass in Florida.)

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. 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 contact 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. (Optional statements for adjustable sprayers - 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 6666 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, Heartloaf drymary, Hemp, Henbit, Hoary cress, Honeysuckle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarter, 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, Sweetclover, Tarweed, Thistle, Toadflax, Tumbleweed, Velvetleaf, 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 (many 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 an additional) treatment in 3 to 4 weeks.

(HOSE-END SPRAYER INSTRUCTIONS)

HOW TO APPLY: Use any hose-end sprayer that is designed to 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 rate of 60 to 1). The following are adjustable/dial sprayers:

<u>MANUFACTURER</u>	<u>SETTING</u>
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 4,250 to 6,666 square feet on N-Northern or Cool Season grasses or 8,500 to

10,000 square feet for application on S-Southern or Warm Season grasses. The entire contents of this bottle must be used to make the proper recommended application rate.

Determine the area to be sprayed. Apply at a rate of 64 oz. (1/2 gal.) per 4,250 to 6,666 square feet on N-Northern or Cool Season grasses or 8,500 to 10,000 square feet for application on S-Southern or Warm Season grasses. 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. Overlap 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 or turn triangular knob clockwise until point aligns with the small arrowhead. Push in to ALLOW product flow. When finished push in from opposite side to STOP product flow. Turn the knob counterclockwise to prevent accidental discharge of product) and this product will mix automatically at the proper ratio. Walk back and forth at steady pace. Overlap slightly for uniform coverage.

(Left Side Panel)

COVERAGE MEASURING GUIDE

Marks on left side panel of bottle indicate square feet covered.
(Not to Scale)

<u>1666 Sq. Ft.</u>	<u>2500 Sq. Ft.</u>	<u>1063 Sq. Ft.</u>
<u>3333 Sq. Ft.</u>	<u>5000 Sq. Ft.</u>	<u>2125 Sq. Ft.</u>
<u>5000 Sq. Ft.</u>	<u>7500 Sq. Ft.</u>	<u>3188 Sq. Ft.</u>
<u>6666 Sq. Ft.</u>	<u>10000 Sq. Ft.</u>	<u>4250 Sq. Ft.</u>
Cool Season (N)	Warm Season (S)	(Optional)

(Right Side Panel)

STORAGE AND DISPOSAL

STORAGE: Keep from freezing (For 25-1-2 fertilizer - Do Not Store above 95°F) To be stored in original container (when applicable: with child-resistant cap) and placed in a locked area inaccessible to children. Do not store near feed or foodstuff.

PESTICIDE DISPOSAL: Product remaining in original container should be disposed of by securely wrapping original container in several layers of newspaper and discarding in trash.

CONTAINER DISPOSAL: Do not reuse container except as a hose-end sprayer bottle only when using Riverdale Premium 6666 Liquid Weed and Feed refill size. Rinse thoroughly before discarding in trash.

NOTICE: Buyer assumes all responsibility for safety and use not in strict accordance with directions and instructions for use. (Optional statement - If these terms are not acceptable, return at once unopened.) (RV 041502)

The following note will not be part of the actual label copy.

Note: Guaranteed (fertilizer) analysis and weight will vary among various commercial fertilizer manufacturers.

(Additional copy for refill size)

For refill only: Use this bottle to refill the quart hose-end sprayer of Riverdale Premium 6666 Liquid Weed and Feed. Follow directions for use on hose-end sprayer bottle.

(Optional statements - and directions pamphlet enclosed with 1 quart bottle).

(- save when you buy this double coverage refill!)

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(GWF SPRAYER INFORMATION)

(Optional statements - For Residential Use Only)

For more information about Seller's Products call 1-800-XXX-XXXX

Nozzle "A" Instructions

HOW TO APPLY:

- No Mix, No Measure
- Make sure ON/OFF valve is in OFF position.
- Shake well before applying.
- Connect spray nozzle to hose.
- Turn on the water at the tap.
- When ready to treat, point in direction away from face and body and pull the tab toward the hose end connection. Turn the ON/OFF valve to the ON position. The water mixes automatically with this product at the proper ratio.
- Walk and spray at a steady pace. Marks on the side of bottle indicate the number of square feet covered in 1,000's.

OMS SPRAYER INSTRUCTIONS

- Overlap treated areas by at least one foot to insure proper coverage.
- Apply beginning in spring, after your second mowing, through the fall.
- Regular lawn watering is necessary to maintain a quality lawn. During periods of drought or hot, dry weather, do not use this product until the rains occur or the lawn is watered.

PRECAUTIONS

- Apply on a calm day to avoid spray drift to non-target plants.
- Wait until you mow three or four times before you use this product on new grass.
- Avoid applications near shrubs, flowers, fruit or vegetable plants as plant injury may occur.

DIRECTIONS FOR USE



Begin spraying at a point furthest from the faucet, holding the product in front of you at waist height. Use a side-to-side swinging motion to cover an 8- to 10-foot swath. Overlap swaths by at least one foot to ensure even coverage.

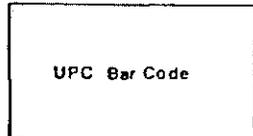
Easy to use

1. Make sure the ON/OFF Water Control Knob is in the OFF position.
2. Shake well before applying.
3. Connect spray nozzle to hose with convenient swivel end.
4. Turn the red knob on the Product Control Button to align with the white tab, then push the button in all the way. Avoid squeezing bottle after this, as contents may spray through nozzle opening.
5. Turn water on at faucet.
6. When ready to spray, point nozzle toward lawn, then turn Water Control Knob to ON position.
7. When finished, push red Product Control Button to OFF position to stop product flow. Turn Water Control Knob to OFF and turn off faucet. Turn Water Control Knob to ON to release water pressure, then turn OFF again.
8. To prevent accidental discharge when not in use, turn red knob so it is not aligned with white tab and cannot be pushed in. Store out of reach of children.

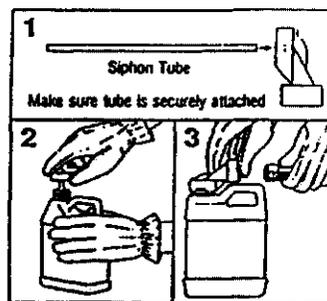
**Questions?
Call Scott's
toll-free
Consumer
Hotline:
1-800-543-TURF**

**Seller's Policy
No Quibble Guarantee**

If for any reason you are not satisfied with results after using any seller's product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

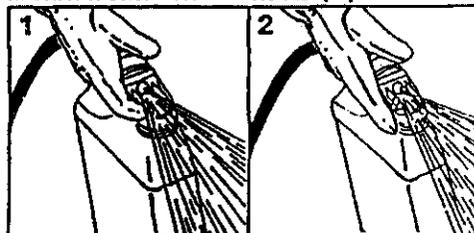


**Dexol Industries
Sprayer Instructions**



ASSEMBLY INSTRUCTIONS

1. Attach siphonage tube to hose-end sprayer attachment. 2. Remove cap from bottle and insert sprayer attachment. Securely tighten sprayer attachment on bottle. 3. Screw hose into hose-end sprayer attachment.



SPRAYING INSTRUCTIONS

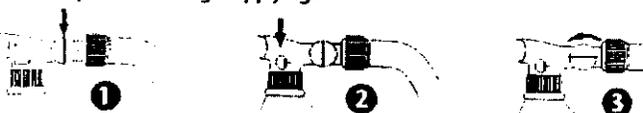
1. Turn on water. **TO START FLOW OF PRODUCT:** Place finger over hole on top right side of sprayer attachment. Hold about 3 feet above area to be treated moving at a steady pace to ensure consistent coverage. 2. **TO STOP FLOW OF PRODUCT:** Remove finger from hose to break siphon action. NOTE: To ensure adequate coverage, use moderate to high water pressure.

Schultz Company Sprayer Instructions

READY TO SPRAY — NO MIXING REQUIRED!

Shake container vigorously for one minute.

1. Attach garden hose to sprayer.
1. Turn larger water control valve to OFF. Turn on faucet. Work backward from the farthest area you will be feeding to avoid walking over areas already sprayed.
2. Turn small white button to align flat side with T-tab, and push button in completely.
3. Position sprayer toward area to treat, and turn water control valve to horizontal position to begin applying.



IMPORTANT: When finished, return white button to closed position. Turn water control valve to OFF and turn off faucet. Turn water control valve to horizontal position again to release water pressure. Store remaining product with button & valve turned off.

Optional CLI language:

- Dimethylamine Salt of 2,4-D*
- Dimethylamine Salt of Mecoprop**
- Dimethylamine Salt of Dichlorprop***

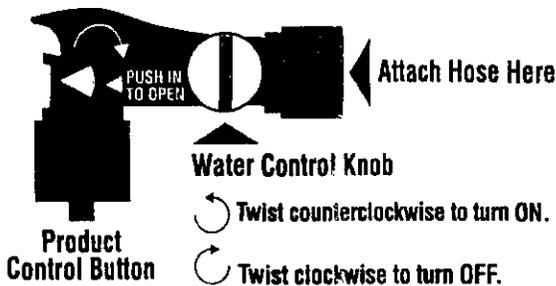
- *2,4-D Acid
- **Mecoprop Acid
- ***Dichlorprop Acid

First Aid

Optional Marketing Hype:

- KILLS 140+ WEED TYPES
- STARTS WORKING OVERNIGHT
- KILLS WEEDS, NOT THE LAWN

Value Garden's Sprayer Instructions



EASY TO USE:

1. Make sure the ON/OFF Water Control Knob is in the OFF position.
2. Shake Well before applying.
3. Connect spray nozzle to hose with convenient swivel end.
4. Turn the triangular knob on the Product Control Button to align with the small arrowhead, then push the button in all the way. Avoid squeezing bottle, as contents may spray through nozzle opening.
5. Turn water on at faucet.
6. When ready to spray, point nozzle toward the lawn, then turn Water Control Knob to ON position.
7. When finished, push Product Control Button to OFF position to stop product flow. Turn Water Control Knob to OFF and turn off faucet. Turn Water Control Knob to ON to release water pressure, then turn OFF again.
8. To prevent accidental discharge when not in use, turn the triangular knob so that it is not aligned with the small arrowhead and cannot be pushed in. Store out of reach of children.