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Systems Integration Group, Inc.



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

MAY 25 1999

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Dear Mr. Sawyer:

Subject: Conversion from 2,4-DP to 2,4-DP-p
Riverdale Triamine II Lawn Weed Killer
EPA Registration Number: 228-217
Your Submission Dated April 7, 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 dichlorprop from its racemic form [2-(2,4-dichlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2,4-dichlorophenoxy) 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 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 form of dichlorprop, or applicable salt 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 04/07/99 has been placed in the Agency's file for the subject product. These CSFs supersedes 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

3046

(Commercial Label)

RIVERDALE TRIAMINE™ II

LAWN WEED KILLER

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

ONE QUART TREATS (COVERS) UP TO 20,000 SQ. FT.
(See directions for different grasses.)

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	4.78%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**	2.36%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***	2.33%
INERT INGREDIENTS:	90.53%
TOTAL	100.00%

Isomer Specific Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	3.9%	0.33 lbs./gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	2.0%	0.17 lbs./gal.
***(+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	2.0%	0.17 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

WARNING

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

NET CONTENTS GAL.

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAY 25 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-217

EPA REG. NO. 228-217

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

**PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear face shield or goggles when mixing, loading or applying this product. Harmful if swallowed, inhaled, or absorbed through skin. Wash thoroughly after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Immediately flush eyes with fresh water for 15 minutes and get medical attention immediately.

IF ON SKIN: Wash skin with plenty of soap and water. Get medical attention.

IF SWALLOWED: Drink one or two 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

Drift or runoff may adversely affect non-target plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate 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.

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.

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 LAWN WEED KILLER is a stable solution containing a mixture of three herbicides. It is non-flammable. It is for use on Lawns, Turf (not pastures) and Golf Fairways, Aprons, Tees and Roughs, Parks, Cemeteries, along Highways, Rights-of-Way, Drainage Ditchbanks 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 cut grass 1 to 2 days before and after application. 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™ II LAWN WEED KILLER

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, Goats-beard, 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, Sheep sorrel, Shepherdspurse, 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.

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 8 to 10-1/2 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 2 to 3 teaspoons in 2 quarts of water applied to 100 square feet. For larger areas - use 1 to 1-1/2 gallons in 50 gallons of water to 1 acre.

To kill undesirable weeds such as thistle, bindweed, dock and ragweed, use 8 to 10-1/2 ounces in 6 gallons of water (or 2 to 3 teaspoonfuls in 2 quarts of water), and apply directly to plants, wetting them thoroughly. Repeat as necessary. For larger areas use 1 gallon in 50 gallons of water.

To kill undesirable plants such as poison ivy and poison oak, use 8 to 10-1/2 teaspoonfuls in 2 quarts of water or 2 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 4 to 5 ounces in 6 gallons of water (2 to 3 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: For control of broadleaf weeds, mix at a rate of 1-1/3 to 4 gallons of Triamine II Lawn Weed Killer per 50 to 300 gallons of water. This mixture will cover one acre. 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 higher rate with high water volume.

For Spot Treatment: Put 3 teaspoons Triamine II 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.

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: 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

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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.

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

(RV 040799)