

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

MAY 9 2000

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p
 And 2,4-DP to 2,4-DP-p
 Riverdale Triamine Granular Weed Killer
 EPA Registration Number: 228-223
 Your Correspondence Dated July 14, 1999, Resubmission

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 dichlorprop 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, dated 04/14/99) has 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 (1) copy of your final printed labeling before you release the product for shipment.

CONCURRENCES							
SYMBOL ▶	7505C						
SURNAME ▶	MHoward						
DATE ▶	May 8, 2000						

Please note, the existing stocks date given in this correspondence supercedes the extension date granted in my letter dated May 1, 2000 (only for the subject product). A copy of the May 1st letter is enclosed.

Sincerely yours, —

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

Enclosures

RIVERDALE

TRIAMINE™

GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE WHICH CONTROLS
A WIDE SPECTRUM OF BROADLEAF WEEDS

Weeds controlled by this product gradually die and
disappear from the lawn.

CONTAINS 2,4-D, MECOPROP-p AND DICHLORPROP-p.

Treats (or covers) 5,000 Sq. Ft. (100' x 125')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	0.425%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.212%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	0.209%
INERT INGREDIENTS:	99.154%
TOTAL	100.000%

ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2,4-Dichlorophenoxyacetic Acid	0.350%
** (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.175%
*** (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	0.175%

†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 BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT

EPA REG. NO. 228-223

NET WEIGHT 50 LBS.

EPA EST. NO. 228-IL-1

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAY 9 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-223

MANUFACTURED BY
RIVERDALE CHEMICAL COMPANY
GLENWOOD, ILLINOIS 60425-1584

(Back Panel)

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

Avoid inhalation of dust and contact with eyes, skin, or clothing. Wear long pants, long-sleeved shirt, socks, shoes and gloves when loading and applying this product. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. 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 dust has settled.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get Medical Attention.
IF IN EYES: Flush Eyes with Water for 15 Minutes. Get medical attention.
IF ON SKIN: Wash skin with Soap and Water.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and 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, nor pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

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.

TRIAMINE™ GRANULAR WEED KILLER is a stable mixture of three herbicides. It is for use on Lawns, Ornamental Turf (not pastures), Parks, and Golf Fairways, Aprons, Tees and Roughs.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to control many broadleaf weeds such as:

Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, Bidan, 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 cowthistle, 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, Henbit, Hoary cress, Honeysuckle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarter, Locoweed, Lupine, Mallow, Marsh-elder, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nutgrass, Orange hawkweed, Oxalis, Parsnip, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain,

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Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prickly lettuce, Primrose, Puncture vine, Purslane, Ragweed, Red clover, Red sorrel, Rush, Russian thistle, Sagebrush, St. Johnswort, Sheep sorrel, Shepherdspurse, Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, 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.

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. Do not mow 1 to 2 days before and after application. Apply when grass is moist (after a rain, sprinkling or dew). For most effective broadleaf weed killing action, avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material. Do not apply if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 50 pound bag should be used on 12500 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is equal to one application.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds per 1000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 sq. ft. and adjust to apply at the rate of 1 lb. per 250 sq. ft. Clean spreader thoroughly after use.

SPREADER SETTINGS FOR

ONE PASS APPLICATION:

<u>MAKE</u>	<u>SETTING</u>
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

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. Do not stack more than two pallets high. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. If container is damaged or if pesticide has leaked, clean up all spilled material. Improper disposal of excess pesticide, spray mixtures or rinsate is a violation of Federal law and may contaminate groundwater. 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.

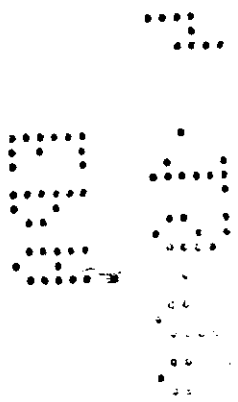
CONTAINER DISPOSAL: Completely empty bag into application equipment. The dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay away from smoke.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(RV 041499)

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

*NOTE: Spreader Settings will vary among various commercial fertilizer manufacturers.



(Non-Commercial Label)

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RIVERDALE

TRIAMINE™

GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE WHICH CONTROLS
A WIDE SPECTRUM OF BROADLEAF WEEDS.

Weeds Controlled by this product gradually die and
disappear from the lawn.

CONTAINS 2,4-D, MECOPROP-p AND DICHLORPROP-p.

Treats (or covers) 5,000 Sq. Ft. (50' x 100')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	0.425%
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Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	0.209%
INERT INGREDIENTS:	99.154%
TOTAL	100.000%

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*2,4-Dichlorophenoxyacetic Acid	0.350%
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.175%
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†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 BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT

NET WEIGHT 20 LBS.

EPA REG. NO. 228-223

EPA EST. NO. 228-IL-1

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAY 9 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-223

MANUFACTURED BY
RIVERDALE CHEMICAL COMPANY
GLENWOOD, ILLINOIS 60425-1584

(Back Panel)

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

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STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get Medical Attention.
IF IN EYES: Flush Eyes with Water for 15 Minutes. Get medical attention.
IF ON SKIN: Wash skin with Soap and Water.

ENVIRONMENTAL HAZARDS

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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.

TRIAMINE™ GRANULAR WEED KILLER is a stable mixture of three herbicides. It is for use on Lawns, Ornamental Turf, Parks, also Golf Fairways, Aprons, Tees and Roughs.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to control many broadleaf weeds in lawns; such as:

Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, 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, Honey-suckle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambs-quarter, Locoweed, Lupine, Mallow, Marshelder, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nutgrass, Orange hawkweed, Oxalis, Parsnip, Pennycress, Pennywort, Pepper-grass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poor-joe, Povertyweed, Prickly lettuce, Primrose, Puncture vine, Purslane, Ragweed, Red clover, Red sorrel, Rush, Russian thistle, Sandbrush, St. Johnswort, Sheep sorrel, Shepherdspurse, Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, 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.

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers. Do not

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reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. Do not mow 1 to 2 days before and after application. Apply when grass is moist (after a rain, sprinkling or dew). For most effective broadleaf weed killing action, avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material. Do not apply if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 20 pound bag should be used on 5000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is equal to one application.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds per 1000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 sq. ft. and adjust to apply at the rate of 1 lb. per 250 sq. ft. Clean spreader thoroughly after use.

SPREADER SETTINGS FOR
ONE PASS APPLICATION:

<u>MAKE</u>	<u>SETTING</u>
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

STORAGE AND DISPOSAL

STORAGE: Store in original container and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near other feed or foodstuffs. To prevent cross-contamination, do not store near other fertilizers, or near herbicides, insecticides, fungicides or seeds.

PRODUCT DISPOSAL: To dispose of bag which contains unused product, securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse empty bag. Fold empty bag and discard in trash.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(RV 041499)

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

*NOTE: Spreader Settings will vary among various commercial fertilizer manufacturers.