



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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Mr. George Meindl
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

JUN 25 2010

Subject: Label Amendment: Response to comments in Agency 2,4-Dp RED amendment letter dated May 22, 2009 and change in product's primary brand name
Product Name: Triamine 8000 Lawn Weed Killer
EPA Reg. No. 228-239
Application Dated March 26, 2010

Dear Mr. Meindl:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following label changes before you release the product for shipment.

- a. Revise the Environmental Hazards statements, as required by the 2,4-D RED, to read as follows: (changes in bold)
"This **pesticide is toxic to fish and aquatic invertebrates and** may adversely affect non-target plants. **Do not apply directly to water.** To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soil is permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater."
- b. Delete "General" from the heading "General Information" as this is an implied safety claim and thereby makes all text associated with this word unenforceable. "General" may be replaced with "Product."
- c. Replace "4 weeks" with "30 days" in the sentence, "Some hard-to-control broadleaf weeds may require a second (or an additional) treatment in 4 weeks." On page 3 of the proposed label.

Continued on page 2

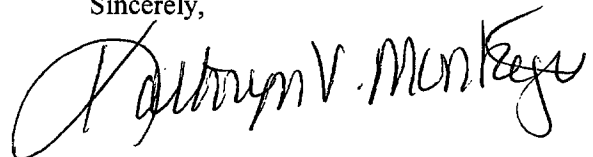
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- d. Assure that all application rates on this label comply with the most restrictive limitations of all the active ingredients contained in this product.
- e. Per the 2,4-Dp and MCP-p REDs, the following text must be included in the USE PRECAUTIONS section:

“Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays and oceans. Do not apply when windy. To prevent product run-off, do not over-water the treated area(s) to the point of run-off or apply when raining or when rain is expected that day.”

A stamped copy of your labeling is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after the next printing must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. Amended labeling will supercede all previously accepted ones.

Sincerely,



Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

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RESIDENTIAL

TRIAMINE® 8000 LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL IN RESIDENTIAL TURF (OR LAWNS)

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

ONE QUART COVERS UPTO 16,000 SQUARE FEET
(See directions for different grasses.)

GET THE OPTICAL ADVANTAGE®

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	3.6%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**‡	1.8%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***‡	1.8%

OTHER INGREDIENTS:	92.8%
TOTAL:	100.0%

Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	3.0%, 0.26 lbs/gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	1.5%, 0.13 lbs/gal.
***(+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	1.5%, 0.13 lbs/gal.

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1 840

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUN 25 2010

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

228-239

EPA REG. NO. 228-239
EPA EST. NO. 228-IL-1

NET CONTENTS

000228-00239.20100326.Amendment

Manufactured For
NUFARM AMERICAS INC.
150 Harvester Drive
Burr Ridge, IL 60527



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

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist or vapor.

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • 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 SWALLOWED	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

ENVIRONMENTAL HAZARDS

This product may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

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

This product is a stable solution containing a mixture of three herbicides. It is non-flammable. It is for use on Residential Turf.

Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until sprays have dried.

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 specified 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

Alder	Dogfennel	Nutgrass	Spurweed
Artichoke	Elderberry	Orange hawkweed	Stinkweed
Aster	English daisy	Oxalis	Stitchwort
Austrian fieldcress	Flea bane (daisy)	Parsnip	Sumac
Beaartick	Flixweed	Pennycress	Sunflower
Biden	Florida pusley	Pennwort	Sweet clover
Bindweed	Frenchweed	Peppergrass	Tarweed
Bitterweed	Galinsoga	Pepperweed	Thistle
Bitter wintercress	Goatsbeard	Pigweed	Toadflax
Black medic	Goldenrod	Plantain	Tumbleweed
Blessed thistle	Ground ivy	Poison hemlock	Velvet leaf
Blue lettuce	Gumweed	Poison ivy	Veronica
Box elder	Hawkweed	Poison oak	Vervain
Broomweed	Healall	Pokeweed	Vetch
Buckhorn	Heartleaf drymarv	Poorioe	Virginia buttonweed
Bull thistle	Hemp	Povertweed	Virginia creeper
Burdock	Henbit	Prickly lettuce	Wild aster
Bur ragweed	Hoary cress	Primrose	Wild carrot
Buttercup	Honeysuckle	Puncture vine	Wild garlic
Canada thistle	Horsetail	Purslane	Wild geranium
Carpetweed	Indiana mallow	Ragweed	Wild lettuce
Catnip	Ironweed	Red clover	Wild onion
Chickweed	Jewelweed	Red sorrel	Wild radish
Chicory	Jimsonweed	Rush	Wild rape
Clover	Kochia	Russian thistle	Wild strawberry
Cockle	Knotweed	St. Johnswort	Wild sweet potato
Cocklebur	Lambsquarter	Sheep sorrel	Willow
Coffeebean	Locoweed	Shepherdspurse	Witchweed
Coffeeweed	Lupines	Smartweed	Woodsorrel
Common sowthistle	Mallow	Sneezeweed	Wormseed
Creeping jennv	Marshelder	Southern wild rose	Yarrow
Croton	Mexicanweed	Sowthistle	Yellow rocket
Curly indiao	Morningglory	Spanishneedle	and other broadleaf
Dandelion	Musk thistle	Spatterdock	weeds.
Dock	Mustard	Speedwell	
Dogbane	Nettle	Spurge	

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 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 8 ounces in 6 gallons of water and apply with pump or hose-end sprayer or sprinkling can to 2,000 square feet of lawn. For smaller areas - use 3 teaspoons in 2 quarts of water applied to 80 square feet. For larger areas - use 1 gallon in 50 gallons of water to 4/5 acre (35,000 square feet).

To kill undesirable weeds such as Thistle, Bindweed, Dock and Ragweed, use 8 fluid ounces in 4-3/4 gallons of water (or 3 teaspoons (1 tablespoon) in 1-2/3 quarts of water), and apply directly to plants, wetting them thoroughly. Repeat in no less than 30 days if additional treatment is needed. For larger areas, use 1 gallon in 40 gallons of water.

To kill undesirable plants such as Poison ivy and Poison oak, use 8 teaspoons in 1-2/3 quarts of water or 2 gallons in 10 gallons of water and drench plants when they are fully leaved. Repeat in no less than 30 days if additional treatment is needed. 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 ounces in 6 gallons of water to treat 2,000 square feet (3 teaspoons or 1 tablespoon, in 4 quarts of water applied to 160 square feet). 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.

For Spot Treatment: Put 4-1/2 teaspoons of this product into an empty quart container with trigger sprayer. Then add 30 fluid ounces of 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 4 weeks for hard-to-control weeds.

HOSE-END SPRAYER INSTRUCTIONS: Use a hose-end sprayer designed for lawns. Put specified amount of this product (Column 1) in bottle and add water to indicated level (Column 2), and spray on area indicated (Column 3). For example, to spray 2,500 square feet, measure 10 ounces in jar and add water to the 10 gallon level and mix. Turn on hose and spray as evenly as possible over 2,500 square feet.

Column 1 Amount Triamine 8000 Lawn Weed Killer to Use (Fluid Ounces)	Column 2 Fill Bottle To (Gallons)	Column 3 Area to Treat (Square Feet)
5	5	1,250
10	10	2,500
15	15	3,750
20	20 (Full)	5,000

PRESSURE SPRAYER INSTRUCTIONS: Measure indicated amount of this product into tank and dilute with water according to the following chart. Use a spray pattern which gives small droplets without any fine mist and cover the area indicated.

Amount Triamine 8000 Lawn Weed Killer (Fluid Ounces)	Amount of Water In Sprayer (Gallons)	Area to Be Sprayed (Square Feet)
1	1	250
2	2	500
3	3	750
4	4	1,000

DISPOSAL SPRAYER AND BOTTLE INSTRUCTIONS: Determine area to be sprayed. Apply at a rate of 32 fluid ounces (1 quart) per 8,000 square feet for Cool Season grasses or 16,000 square feet 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 product will mix automatically at the proper ratio. Walk back and forth at steady pace.

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RESIDENTIAL

2,000	Square Feet	4,000	
4,000	Square Feet	8,000	
6,000	Square Feet	12,000	(Marks on left of 1 a quart disposable bottle.
8,000	Square Feet	16,000	Not to scale.)
Cool Season	Square Feet	Warm Season	

Broadcast Application Restrictions: Do not make more than 2 applications per year with a minimum of 30 days between applications. Do not apply more than 5.75 gallons of product per acre per application.

Spot Treatment Application Restrictions: Do not make more than 2 applications per year with a minimum of 30 days between applications. Do not apply more than 1-1/2 pints of product per 1,000 square feet per application. Broadcast application is prohibited at this use rate. Spot treatment is defined as a treatment area no greater than 1,000 square feet.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV032610A)

Triamine and The Optical Advantage is a registered trademarks of Nufarm Americas Inc.

Alternate instructions for The Scotts Company Concentrate and Ready-To-Use System.

COOL SEASON GRASSES	
AMOUNT TO USE	Apply with pump up or hose-end sprayer. For small areas, use 1 fl. oz. in 1 gallon of water applied to 160 sq. ft. For larger areas, use 8 oz. in 6 gallons of water to 2,000 sq. ft. of lawn.
	When using Ortho® Dial 'N Spray® applicator: Set dial to 1 oz. Add 4 fl. oz. (8 Tbs.) to sprayer jar. DO NOT ADD WATER. Spray evenly over 1,000 sq. ft. until jar is empty.
WARM SEASON GRASSES	
AMOUNT TO USE	Use a one-half rate which is 1 Tbs. (.5 oz.) in one gallon of water applied to 160 sq. ft. (4 oz. in 6 gallons of water to treat 2,000 sq. ft.
FOR SPOT TREATMENT	When using Ortho® Dial 'N Spray® applicator: Set dial to 4 tsp. Add 2 fl. oz. to sprayer jar. DO NOT ADD WATER. Spray evenly over 1,000 sq. ft. until jar is empty.
	Put 3 fl. oz. of BASIC SOLUTIONSTM Lawn Weed Killer into an empty gallon container with trigger sprayer. Then add 120 oz. of tap water.

DO NOT USE on Floratam a variety of St. Augustinegrass.

HOW TO USE THE Ready-To-Spray SYSTEM	
CONNECT	<ol style="list-style-type: none"> 1. Shake well before using. 2. Connect sprayer hose. 3. Turn on water.
SPRAY	<ol style="list-style-type: none"> 1. To begin spraying, point nozzle in the direction you want to spray. 2. Bend small white plastic tab on side of sprayer back and turn knob clockwise to ON position. 3. Spray evenly over measured areas.
FINISH	<ol style="list-style-type: none"> 1. To stop spraying, turn knob counter-clockwise to OFF position. 2. Turn off water. 3. Relieve water pressure by turning knob to ON position until water slows to a drip. Then, turn knob back to OFF position. 4. Disconnect sprayer from hose.

Alternate chemical description from CLI

ACTIVE INGREDIENTS
Dimethylamine Salt of 2,4-D*
Dimethylamine Salt of Mecoprop-p**
Dimethylamine Salt of Dichlorprop-p**
INERT INGREDIENTS
TOTAL
Isomer Specific AOAC Method, Equivalent to
*2,4-D Acid
**Mecoprop-p
***Dichlorprop-p Acid

[Optional Marketing Language]
Kill weeds, Won't harm the lawn!