

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

DEC 9 1998

Dear Mr. Martens:

Subject: Conversion from MCPP to MCPP-p
 Riverdale Tri-Power (R) Selective Herbicide
 EPA Registration Number: 228-262
 Your Submission Dated October 23, 1998

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 Formulation, dated 10/16/98) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	DWorgan							
DATE ▶								

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

RIVERDALE

TRI-POWER® SELECTIVE HERBICIDE

FOR SELECTIVE BROADLEAF WEED CONTROL
IN ORNAMENTAL LAWNS AND TURF GRASSES
ALSO FOR WOODY PLANTS, ROADSIDES, AND SIMILAR NON-CROP AREAS

CONTROLS (or KILLS): Dandelion, Chickweed, Black medic, Knotweed, Plantain,
Oxalis, Clover, Cocklebur, Thistle and many other species of
broadleaf weeds; some of which are listed on this label.

CONTAINS MCPA, MECOPROP-p AND DICAMBA

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	40.42%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	7.99%
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***	3.97%
INERT INGREDIENTS:	47.62%
TOTAL	100.00%

Isomer Specific Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	33.00%	3.08 lbs./gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	6.60%	0.62 lbs./gal.
***3,6-Dichloro-o-Anisic Acid	3.30%	0.31 lbs./gal.

†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

Tri-Power® - Is A Registered Trademark of Riverdale Chemical Company.
THE OPTICAL ADVANTAGE™ is a Trademark of Riverdale Chemical Company.

For Use By Professional Turf Maintenance Personnel,
Landscaping or Commercial Applicators Only

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que
se la explique a usted en detalle.

**SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND
STATEMENT OF PRACTICAL TREATMENT**

EPA REG. NO. 228-262 NET CONTENTS GALS. EPA EST. NO. 228-IL-1

MANUFACTURED BY
RIVERDALE CHEMICAL COMPANY
GLENWOOD, ILLINOIS 60425-1584

NOTE: Spanish Language is optional

ACCEPTED
With Comments
DEC 9 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
this pesticide is registered under
EPA Reg. No. 228-262

Revised 10/16/93 Converted MCPP to Optical Isomer.

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(Inside Booklet)

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER - PELIGRO**

Corrosive. This concentrate causes irreversible eye damage. Harmful or fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist. Do not get in eyes, on skin or on clothing. Wear face shield or goggles when mixing and loading this product. After product has been diluted in accordance with the directions for use on turf below, goggles, face shield or safety glasses are not required. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

- IF IN EYES:** Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.
- IF SWALLOWED:** Drink promptly a large quantity of milk, egg whites or gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.
- NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.
- IF ON SKIN:** If contacted with the concentrate, wash with plenty of soap and water. Get medical attention. If contact is made after this product has been diluted, wash with plenty of soap and water. Rinse thoroughly.
- IF INHALED:** Remove victim to fresh air and apply respiration if indicated.

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect 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. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not contaminate water when disposing of equipment washwaters. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes.

Most cases of ground water contamination involving phenoxy herbicides such as MCPA and MCPP 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.

Tri-Power® is for use on Ornamental Turf, such as Lawns, Parks, Cemeteries, Golf Courses (Fairways, Aprons, Tees and Roughs), Woody Plants, Roadsides, and similar non-crop areas. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production or for research purposes.

USE PRECAUTIONS

Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants. Do not use on Dichondra, nor on lawns or turf where desirable clovers are present. Avoid fine mists. Use lawn type sprayer with coarse spray as wind drift is less likely. Avoid contact with exposed feeder roots of ornamentals and trees. Maximum control (or kill) of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. Use the

higher rate for hard-to-control (or kill) weeds. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90°F.

For optimum results: (1) avoid applying during excessively dry or hot periods unless irrigation is used; (2) avoid applying if rainfall is expected within 24 hours, nor should lawns be irrigated (watered) for 24 hours following application; (3) turf should not be mowed 1 to 2 days before and following application; (4) reseed no sooner than 3 to 4 weeks after application of this product. Adding oil, wetting agent, or other surfactant to the spray may be used to increase effectiveness on weeds but doing so may reduce selectivity to turf resulting in turf damage. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other sprays.

Tri-Power® can be mixed with some liquid fertilizers or liquid iron materials. Because liquid fertilizers and liquid iron differ in pH, free ammonia content, density, salt concentration, and percentage of water, a compatibility test (given below) is recommended prior to mixing in the application equipment. All regulations, either State or Federal, relating to the application of liquid fertilizers or liquid iron and this product must be strictly followed. The following compatibility test should always be performed prior to full-scale mixing.

1. Pour 18 ounces of water into a quart jar.
2. Add 1 ounce of either the liquid fertilizer or liquid iron to be used.
3. Add 1 ounce of Tri-Power®.
4. Close jar and shake well.
5. Watch the mixture for several seconds after shaking and check again after 30 minutes.
6. If the mixture does not show signs of separating, the combination may be used. If the mixture foams excessively, gels, separates or gets very thick, do not combine for field application.
7. Compatibility may be improved by the use of a compatibility agent. Some suggested compatibility agents to try are Kalo Laboratories Complex, Hopkins Chemical's Unite, Farm Chemicals Inc.'s Compat, Harcros Chemicals' T-Mulz 734-2, Rigo Company's Rigo Compatibility Agent, Witco Chemical's Sponto 168D, Amoco Oil's Amoco Spray Mate and Universal Coop.'s Chem-Link. These agents are all used in the same manner. Follow the previously outlined test procedures and add 1/6 ounce of the compatibility agent between steps (the compatibility agent must be added to the fertilizer or iron before adding the Tri-Power®).
8. If the mixture does not separate, gel, foam or get very thick, it may be used for field application. Mix only the amount to be sprayed. Do not allow to stand overnight.

WEEDS CONTROLLED (OR KILLED) BY TRI-POWER®

Bedstraw, Bindweed, Black Medic, Buckhorn, Burdock, Buttercup, Canada thistle, Carpetweed, Chickweed, Chicory, Clover, Cocklebur, Dandelion, Dock, Dog fennel, English daisy, Florida pusley, Frenchweed, Goldenrod, Ground ivy, Hawkweed, Healall, Heartleaf drymary, Henbit, Jimsonweed, Knotweed, Kochia, Lambsquarter, Lespedeza, Mallow, Morningglory, Mustard, Oxalis, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison ivy, Poison oak, Purslane, Ragweed, Red clover, Red sorrel, Sheep sorrel, Shepherdspurse, Smartweed, Speedwell, Spurge, Spurweed, Stinging nettle, Stitchwort, Thistle, Toadflax, Veronica, Wild aster, Wild carrot, Wild garlic, Wild geranium, Wild lettuce, Wild onion, Wild radish, Wood sorrel, Yarrow and many other broadleaf weeds.

ORNAMENTAL LAWNS AND TURFS

Cool Season Grasses: Apply Tri-Power Selective Herbicide at the rate of 2-1/2 to 3-1/2 pints in 20 to 240 gallons of spray solution per acre (0.9 to 1.25 fluid ounces in 0.5 to 4 gallons of water per 1,000 square feet) to control (or kill) weeds growing in ornamental lawn turf planted to Kentucky bluegrass, perennial ryegrass, tall fescue or fine fescue.

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Warm Season Grasses: Apply Tri-Power Selective Herbicide at the rate of 2 to 3 pints in 20 to 240 gallons of spray solution per acre (0.7 to 1.1 fluid ounces in 0.5 to 4 gallons of water per 1,000 square feet) to control (or kill) weeds growing in Bermuda grass or zoysia grass. Applications to other grass species including bahiagrass, kikuyugrass, buffalograss, centipedegrass, carpetgrass or St. Augustinegrass should be avoided unless injury can be tolerated. Avoid applications to warm season grasses emerging from Winter dormancy unless a slight delay in Spring green-up can be tolerated.

Bentgrass Turf (Other Than Golf Course Greens and Tees): On closely mowed bentgrass, apply Tri-Power at a maximum rate of 2-1/2 pints per acre (0.9 fluid ounces in 3 gallons of water per 1,000 square feet) in May or mid-August through September when weeds are actively growing. Exercise care when applying to avoid overdosing bentgrass, or turf injury may result. Slight turf yellowing should disappear after about 1 week.

NOTE

Care should be taken to avoid overdosing Bentgrass, St. Augustine, and Centipede grasses or injury may result. Large volumes of spray water will aid in obtaining uniform coverage. If hand-type sprayers are used, it is preferable to use a single nozzle sprayer rather than a multiple nozzle boom as sideways application with a boom where the spray from more than one nozzle is allowed to fall on the same area will result in heavy local over-application and subsequent turf discoloration or injury.

Herbi™ Controlled Droplet Applicator: For Cool Season Grasses - Add 1-2/3 to 2-1/2 pints of Tri-Power to the 5 pint Herbi bottle, then fill with water to make 5 pints of mixture or substitute 1/2 pint of a surfactant for water while agitating the solution. For Listed Warm Season Grasses - Apply 1-1/4 to 1-2/3 pints of Tri-Power, then add water to make total of 5 pints of mixture. While walking at approximately 1 pace (3 feet) per second, spray entire contents over 33,000 square feet (3/4 of an acre). Do not overlap (double coverage) at edge of spray patterns. Reduced rates (use 1/2 of rate shown above) of Tri-Power must be applied when grass is stressed from heat, drought, etc. Herbi™ is a trademark of North American Micron.

Controlled Droplet Applicators - (CDA), Atomizers, and Spinning Disk Applicators: For Cool Season Grasses - Use Tri-Power at the rate of 2-1/2 to 3-1/2 pints per acre (0.9 to 1.25 fluid ounces per 1,000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment). For Listed Warm Season Grasses - Use 2 to 3 pints of Tri-Power per acre (0.7 to 1.1 fluid ounces per 1,000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment).
NOTE: For all grasses (1) Do not overlap spray patterns; (2) Use reduced rates if grass is stressed from heat, drought, etc.; and (3) Follow CDA equipment spray instructions.

OTHER NON-CROP AREAS

Roadsides (Including Aprons and Guard Rails), Rights-of-Way, and Other Similar Non-Crop Areas: For the control of broadleaf weeds, mix at a rate of 1/4 to 3/4 gallon of Tri-Power per 50 to 300 gallons of water. This mixture will cover 43,500 square feet. Thoroughly saturate all weeds with spray mixture. Apply any time between the time when plants come into full leaf (Spring) to when the 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 of 3 ounces of Tri-Power per gallon of water and spray to thoroughly wet all foliage.

For Control of Woody Plants: Apply to both stems and foliage any time from the time foliage is completely matured until the time plants start to go dormant. All leaves, stems and suckers must be completely wet to the ground line for effective control. Regrowth may be anticipated on the more resistant species. Add 2/3 gallons of Tri-Power to 100 gallons of water applying 200 to 600 gallons of spray mixture per 43,500 square feet depending upon the height and thickness of the brush. Mix thoroughly before spraying.

STORAGE AND DISPOSAL

STORAGE: Always 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 areas. 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.

PRODUCT DISPOSAL: Pesticide wastes are acutely hazardous. 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. Improper disposal of excess pesticide, spray mixtures, or rinsate is a violation of Federal law. 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: 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.

(PR938&11 042194/RV 101698)

Additional Approved (Optional) Uses:

Bentgrass Turf (Putting and Bowling Greens): On closely mowed bentgrass, apply this product at a maximum rate of 1 fluid ounce in 5 gallons of water per 1,500 square feet - preferably in May or mid-August through September. Slight turf yellowing will disappear after about one week.