



000228-00271-042799

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Systems Integration Group, Inc.

PM23

4/27/99

126

APR 27 1999

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

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p
Riverdale Tri-Power Lawn Weed Killer
EPA Registration Number: 228-271
Your Submission Dated April 2, 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 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(s) of Formula (Basic Formulation and two Alternate Formulations dated 04/02/99) have been placed in the Agency's file for the subject product. These CSF's supersedes all previously submitted CSFs for this product.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	Malyan							
DATE	4/27/99							

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

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RIVERDALE

TRI-POWER® LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL IN ORNAMENTAL LAWNS AND TURF GRASSES AND OTHER LISTED SITES

CONTAINS MCPA, MECOPROP-p AND DICAMBA

One Gallon Treats (Covers) up to 80,000 Sq. Ft. (See Directions for Different Grasses)

KILLS: Dandelion, Chickweed, Black medic, Knotweed, Plantains, Oxalis, Clover, Cocklebur, Thistles and many other species of broadleaf weeds; some of which are listed on this label.

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS: †

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	10.10%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)Propionic Acid**†	2.00%
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***	0.99%
INERT INGREDIENTS:	86.91%
TOTAL	100.00%

By Isomer Specific Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	8.25%, 0.71 lbs/gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)Propionic Acid	1.65%, 0.14 lbs/gal.
***3,6-Dichloro-o-Anisic Acid	0.82%, 0.07 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

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS

EPA REG. NO. 228-271

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

ACCEPTED with COMMENTS In EPA Letter Dated APR 27 1999

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticides registered under EPA Reg. No. 228-271

4 of 6

(Back Panels)

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

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with eyes, skin or clothing. Avoid inhalation of spray mists. Wash thoroughly after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

- IF SWALLOWED:** Call a physician or poison control center. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.
- IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.
- IF INHALED:** Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medical attention.
- IF IN EYES:** Flush with plenty of water. Call a physician if irritation persists.

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. Do not contaminate water when disposing of equipment washwaters or rinsate nor pour washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA and Mecoprop 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.

USE PRECAUTIONS

Maximum kill of weeds will be obtained from Spring or early Fall applications when weeds are actively growing.

Do not use this product for controlling weeds in flower or vegetable beds or around shrubs or ornamental plantings. Do not spray roots of desirable trees and 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 a new dilution for each use. Shake well before using.

506

WEEDS CONTROLLED BY TRI-POWER® LAWN WEED KILLER

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, Heartloaf drymary, Henbit, Jimsonweed, Knotweed, Kochia, Lambsquarters, Mallow, Morningglory, Mustards, Oxalis, Pennywort, Pepperweed, Pigweed, Plantain, Poison ivy, Poison oak, Purslane, Ragweed, Red clover, Red sorrel, Sheep sorrel, Shepherdspurse, Smartweed, Speedwell, Spurge, Spurweed, Stinging nettle, Stitchwort, Thistles, 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 Lawn Weed Killer at the rate of 1-1/4 to 1-3/4 gallons in 20 to 240 gallons of spray solution per acre (3 to 5 fl. oz. in 1/2 to 5 gallons of water per 1,000 square feet) to control weeds growing in ornamental lawn turf planted to Kentucky bluegrass, perennial ryegrass, tall fescue or fine fescue. Avoid applications to bentgrass maintained as a desired turfgrass as temporary injury may result. Where bentgrass or other sensitive grasses are predominant in a lawn, use the lower rate.

Warm Season Grasses

Apply TRI-POWER Lawn Weed Killer at the rate of 1 to 1-1/2 gallons in 20 to 240 gallons spray solution per acre (2-1/2 to 4 fl. oz. in 1/2 to 5 gallons of water per 1,000 square feet) to control 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.

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 1/3 to 1 gallon of TRI-POWER Lawn Weed Killer per 12 to 75 gallons of water. This mixture will cover 11,000 sq. ft. 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 TRI-POWER 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 to 4 weeks for hard-to-control weeds.

To kill undesirable plants such as poison ivy, poison oak, and kudzu, use 5 fl. oz. in 2 quarts of water or 1 gallon 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.

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: 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 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 040299)

Additional Statement for Sub-registrants not using the word "Tri-Power®" in the product name: "Contains Tri-Power® Selective Herbicide".

