



000228-00272-061799

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Systems Integration Group, Inc.

PM23

228-272

6/17/99

1 of 6

JUN 17 1999

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

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p  
Riverdale Tri-Power Spot Weed Killer  
EPA Registration Number: 228-272  
Your Resubmission Dated June 8, 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 Statements 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 (CSFs) 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, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.
3. The Alternate Formulation CSFs (#1 & #2) are acceptable with the following comment: Based on the amount of MCPP-p source product (EPA Reg. No. 7969-126) in the formulation, the nominal concentration of the DMA salt would be 0.12 percent, which differs slightly from the label claim of 0.13 percent. Since the 0.12% value is within the certified limits of this active ingredient, the CSFs are acceptable.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #10:228-272

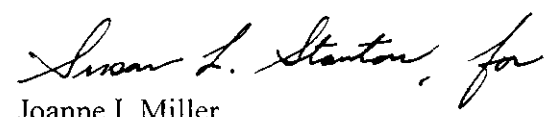
CONCURRENCES

|           |              |  |  |  |  |  |  |  |
|-----------|--------------|--|--|--|--|--|--|--|
| SYMBOL ▶  | 7505C        |  |  |  |  |  |  |  |
| SURNAME ▶ | S. Stanton   |  |  |  |  |  |  |  |
| DATE ▶    | Jun 17, 1999 |  |  |  |  |  |  |  |

Copies of the revised Confidential Statements of Formula (Basic and Alternate Formulations #1 and #2, dated 04/05/99) have 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 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® SPOT WEED KILLER

READY-TO-USE

CONTROLS DANDELIONS, CLOVER, CHICKWEED AND MANY OTHER LISTED WEEDS ON LAWNS AND ORNAMENTAL TURF

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS: †

|  |         |
|--|---------|
| Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*                 | 0.67%   |
| Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid** † | 0.13%   |
| Dimethylamine Salt of Dicamba (3,6-Dichloro-o-anisic Acid)***              | 0.06%   |
| INERT INGREDIENTS:   | 99.14%  |
| TOTAL  | 100.00% |

By Isomer Specific AOAC Method, Equivalent to:

|   |                        |
|---|------------------------|
| *2-Methyl-4-Chlorophenoxyacetic Acid                | 0.55%, 0.046 lbs./gal. |
| ** (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid | 0.11%, 0.009 lbs./gal. |
| ***3,6-Dichloro-o-anisic Acid                       | 0.05%, 0.004 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 PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS 32 FL. OZ. (1 QT.)

EPA REG. NO. 228-272

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
JUN 17 1999

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
228-272

(Side 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 non-target plants. Do not apply directly to water. 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 contaminate water used for irrigation or domestic purposes.

**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**

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. Spray when air is calm to avoid spray drift that might injure desirable ornamental plants. Do not apply when temperature exceeds 90°F. Shake well before using.

**WEEDS CONTROLLED BY TRI-POWER® SPOT WEED KILLER**

.....  
 Bindweed, Black medic, Buckhorn, Burdock, Buttercup, Canada thistle, Carpetweed, Chickweed, Chicory, Clover, Cocklebur, Dandelion, Dock, Dogfennel, English daisy, Florida pusley, Frenchweed, Goldenrod, Ground ivy, Hawkweed, Healall, Heartleaf drymary, Henbit, Jimsonweed, Knotweed, Kochia, Lambsquarter, Mallow, Morningglory, Mustard, Oxalis, Pennywort, Pepperweed, Pigweed, Plantain, 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. ....

.....  
 After applying this product, many broadleaf weeds will begin to show visible signs of leaf curl within a few days. One application should be sufficient. Some hard-to-control broadleaf weeds may require a second (or an additional) treatment in 3 to 4 weeks.

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



6066

Additional Marketing Claims

Kills over 60 weeds.

Won't harm your lawn when used according to label directions.

Kills broadleaf weeds down to the root without harming the lawn when used according to instructions.

Contains Safer's unique Weed-Marker™ colorant, making areas sprayed clearly visible.

In case of emergency, call 1-800-228-5635 Ext. 170.

Safer® Weed-Away contains Safer's unique Weed-Marker colorant. Treated areas will be marked by a green colorant, making areas sprayed clearly visible. Weed-Marker helps avoid overapplication and allows immediate detection of overspray drift onto desirable plants: if drift occurs, immediately rinse off exposed plant surface areas with water. The Weed-Marker colorant breaks down quickly and will be immediately removed by watering or rains. NOTE: Some visible staining may occur if product comes into contact with clothing or shoes. The stains are removed by normal laundering. Shoes should be checked for staining after application so that the colorant will not transfer onto carpets.

