

PM 23

1 of 7

Russell F. Sawyer
Riverdale Chemical Company
425 West 194th St.
Glenwood, IL 60411-3699

- FEB 4 1999

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p
Riverdale^{2D} + 2 MCPP-p Turf Herbicide
EPA Registration Number: 228-288
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 Statements of Formula (Basic Formulation and (2) Alternate Formulations, dated 1/14/99) 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 ▶	DMorgan						
DATE ▶	Feb 4, 1999						

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

3077

RIVERDALE

TRIPLET® MC SAF

SELECTIVE BROADLEAF WEED CONTROL FOR TURFGRASSES
TO CONTROL DANDELION, CLOVER, KIBBIT, PLANTAINS, WILD ONION, AND
MANY OTHER BROADLEAF WEEDS

CONTAINS 2,4-D, MECOPROP-p AND DICAMBA

GET THE OPTICAL ADVANTAGE

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	10.86%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	18.91%
Dimethylamine Salt of Dicamba(3,6-Dichloro-o-anisic Acid)***	4.62%
INERT INGREDIENTS:	65.61%
TOTAL	100.00%

Isomer Specific Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	9.02%	0.82 lbs./gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	15.63%	1.43 lbs./gal.
***3,6-Dichloro-o-anisic Acid	3.84%	0.35 lbs./gal.

†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

Triplet® Is A Registered Trademark of Riverdale Chemical Company
THE OPTICAL ADVANTAGE™ is a Trademark of Riverdale Chemical Company

For Sale To And Use By Professional Personnel Only. Not For Sale To Homeowners.

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 SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT**

EPA REG. NO. 228-288

NET CONTENTS GALS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

Note: Spanish Language optional.

ACCEPTED
with COMMENTS
In EPA Letter Dated

FEB 4 1999

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

228-288

(Side Panels)

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

DANGER - PELIGRO

Corrosive, causes irreversible eye damage. Do not get in eyes, or on skin or clothing. Avoid inhalation of spray mists. Harmful if swallowed, absorbed through skin or inhaled. Wear face shield or goggles and long pants, long-sleeved shirt, socks, shoes and rubber gloves when mixing, loading or applying this product. In addition to the clothing and eye protection listed above, commercial mixer/loaders must wear chemical resistant in place of rubber gloves except when the product is to be applied to a golf course. After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower. 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 spray has dried.

If this container is over one gallon and less than five gallons, then persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. If this container is five gallons or more in capacity, then a mechanical system (probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

Please see additional Precautionary Statements in Directions For Use instructions.

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 at once.

IF SWALLOWED: Call a physician or Poison Control Center. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available drink large quantities of water. Do not induce vomiting or give anything by mouth to an unconscious person.

IF ON SKIN: Wash with plenty of soap and water. If irritation develops, get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate use of gastric lavage.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target 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 apply when weather conditions favor drift from target area. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other spraying. When cleaning equipment, do not pour the 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 domestic or irrigation waters.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling these herbicides 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.

Triplet® MC SAF is for use on Lawns, Turf, Golf Courses (Fairways, Aprons, Tees and Roughs), Parks, Cemeteries 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 mist to vegetables, flowers, ornamentals, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Do not spray on carpetgrass, dichondra nor on lawns or turf where desirable clovers are present. Avoid fine mists. Except as noted, use only lawn-type sprayers. Coarse sprays are less likely to "wind-drift". Use coarse spray droplets. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other species. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90°F. Avoid applying during excessively dry or hot periods unless irrigation is used. For optimum results: (1) turf should not be mowed for 1 to 2 days before and after application; (2) do not apply if rainfall is expected within 48 hours; nor should lawns be irrigated (watered) for 48 hours following application. Reseed no sooner than three to four weeks after application of this product. Failure to observe all precautions may result in injury to turf and/or susceptible plants.

Triplet MC SAF Herbicide can be mixed with some liquid fertilizers or liquid iron materials. Because liquid fertilizer and liquid iron differ in pH, free ammonia content, density, salt concentration, and percentage of water, a compatibility test is recommended prior to mixing in 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.

WEEDS CONTROLLED

Bedstraw
Black medic
Buckhorn
Burdock
Chicory
Chickweed
Clover
Dandelion
Dock
Ground ivy
Healall

Henbit
Knotweed
Lambsquarters
Lespedeza
Mallow
Morningglory
Peppergrass
Pigweed
Plantain
Poison ivy
Poison oak

Purslane
Ragweed
Sheep sorrel
Shepherdspurse
Speedwell
Spurge
Wild carrot
Wild garlic
Wild lettuce
Wild onion
Yarrow

and other broadleaf weeds.

ORNAMENTAL LAWNS AND TURF

APPLICATIONS:

Cool Season Grasses -

RATES:

Use this product at the rate of 3 to 4 pints per acre (1.1 to 1.5 fluid ounces per 1,000 square feet).

For Normal Application - Use 40 to 80 gallons of water per acre (1 to 2 gallons of water per 1,000 square feet).

For Professional Lawn Maintenance - Use 1 to 5 gallons of water per 1,000 square feet. Higher water volumes may be used when tank-mixed with a turf fertilizer. Follow fertilizer labels for proper amounts to add.

Warm Season Grasses -

St. Augustine and Centipede - Apply Triplet MC SAF at a rate of 1 to 1-1/2 pints in 40 to 200 gallons of water per acre. Repeat after 3 weeks if necessary. Use reduced rates if grass is stressed from heat or drought. Exercise care when applying during growth stages from dormancy to green-up and from green-up to dormancy. Some temporary discoloration may occur on these grasses. St. Augustine and Centipede Turfgrasses are sensitive to 2,4-D and great care should be taken to prevent overdosing.

For Bahia, Common Bermuda, and Zoysia Grasses - Apply Triplet MC SAF at a maximum rate of 2 to 2-1/2 pints in 40 to 200 gallons of

water per acre. Use reduced rates if grass is stressed from heat or drought. Exercise care when applying during growth stages from dormancy to green-up and from green-up to dormancy. Some temporary discoloration may occur on warm season grasses.

NOTE: If Bermudagrass is dormant, up to 4 pints per acre may be used. However, some hybrid Bermuda grasses may be sensitive to this product. Contact your local extension service weed control specialist.

NOTE

Care should be taken to avoid overdosing Bentgrass, St. Augustine, and Centipede grasses or injury may result. Large volumes of spray water (i.e. one fluid ounce in 5 gallons of water per 1,500 square feet) 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 2 to 3 pints of Triplet MC SAF to the Herbi 5 pint container. Fill balance of container with water. Keeping container agitated, spray entire contents over 33,000 square feet (approx. 3/4 acre). Do not overlap spray patterns.

For listed warm season grasses - Add 1.0 to 2 pints of Triplet MC SAF to the Herbi 5 pint container and fill balance of container with water. Follow Herbi spray instructions for cool season grasses. Use reduced rates if grass is stressed from heat, drought, etc.

Other Controlled
Droplet Applicators:
(CDA), Atomizers,
and Spinning disk
Applicators:

For cool season grasses - Use Triplet MC SAF at the rate of 3 to 4 pints per acre (1.1 to 1.5 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). Do not overlap spray patterns.

For listed warm season grasses - Use 1 to 2-1/2 pints of Triplet MC SAF per acre (.4 to .9 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); and follow CDA spray instructions for cool season grasses. Use reduced rates if grass is stressed from heat, drought, etc.

Lower Volume
Equipment

Use as little as 5 gallons of water per acre. Use only application equipment that is capable of spreading a uniform droplet, wetting each weed surface. Take special care to prevent overdosing.

Herbi™ is a trademark of North American Micron.

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. 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.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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 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: 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 Chemical Company 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.

(ERP 102393) (PR938&11 042194/RV 102398)

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.