



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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

NOV - 1 2004

Ted Head NUFARM Americas Inc. D/B/A Riverdale - A NUFARM Company 1333 Burr Ridge Parkway, Suite 125A Burr Ridge, IL 60527-0866

Dear Mr. Head:

Subject: Conversion from MCPP to MCPP-p Riverdale Triplet (R) MC II EPA Registration Number: 228-292 Your Submission Dated September 13, 2004

The Agency is conditionally approving an amendment to the registration of the abovereferenced 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 (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, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised Confidential Statements of Formula (Basic and Alternate Formulations, dated 09/13/04) 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,

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Joanne I. Miller Product Manager (23) Herbicide Branch Registration Division (7505C)

Enclosure

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RIVERDALE

TRIPLET® MC II

A Selective Broadleaf Weed Control For Turfgrasses To Control Dandelion, Clover, Henbit, 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*	33.83%
Dimethylamine Salt of	(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid***	8.17%
Dimethylamine Salt of	Dicamba (3,6-Dichloro-o-anisic Acid)***	3.73%
INERT INGREDIENTS:		<u>54.27</u> %
	TOTAL	100.00%

Equivalent to:

Riverdale, Triplet and The Optical Advantage are Registered Trademarks of Nufarm Americas Inc.

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 FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

NET CONTENTS GALS.

EPA REG. NO. 228-292 00228-00292.20040901.1st.pdf EPA EST. NO. 228-IL-1

MANUFACTURED BY NUFARM AMERICAS INC., BURR RIDGE, ILLINOIS 60527-0866

ACCEPTED with COMMENTS in EPA Letter Dated NOV - 1 2004

Under the Federal Insectioide, Fungicide and Rodenticide Act as emensed for the pesticide registered under Era Reg. No.

8 - 29



master label 9-2-04

Riverdale Triplet MC II

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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 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, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) 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.

FIRST AID STATEMENT

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

- IF IN EYES: 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: 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
- IF ON SKIN Take off contaminated clothing. Rinse skin immediately with plenty of OR CLOTHING: water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
- IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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.

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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 II is for use on Ornamental Turf Lawns (Residential, Industrial and Institutional), Parks, Cemeteries, Athletic Fields and Golf Courses (Fairways, Aprons, Tees and Roughs) and similar turf 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 II 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 Lambsquarter Lespedeza Mallow Morningglory Peppergrass Pigweed Plantain Poison ivy Poison oak and other broadleaf weeds Purslane Ragweed Sheep sorrel Shepherdspurse Speedwell Spurge Wild carrot Wild garlic Wild lettuce Wild onion Yarrow

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APPLICATIONS:

Cool Season Grasses - Use this product at the rate of 2-1/2 to 3-2/3 pints per acre (.9 to 1.25 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).

RATES:

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 II at a rate of 1-2/3 to 2-1/4 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 II 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 3-2/3 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.

Bentgrass:

On closely mowed Bentgrass (putting and bowling greens), apply this product at a maximum rate of 3/4 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.

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. 3/4 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 1-3/4 to 2-3/4 pints of Triplet MC II 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 1-1/3 to 1-3/4 pints of Triplet MC II 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.

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Riverdale Triplet MC II

Other Controlled Droplet Applicators: (CDA), Atomizers, and Spinning Disk Applicators: For cool season grasses - Use Triplet MC II at the rate of 2-1/2 to 3-2/3 pints per acre (.9 to 1.25 fluid ounces per 1,000 square feet) sufficient water to assure coverage (1 to 4 gallons of water per is normal for this type of equipment). Do not overlap spray patterns.

For listed warm season grasses - Use 1-3/4 to 2-1/4 pints of Triplet MC II per acre (.66 to .75 fluid ounces per 1,000 square feet) in sufficient water to assure coverage (2 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 VolumeUse as little as 5 gallons of water per acre. Use onlyEquipmentapplication equipment that is capable of spreading a uniformdroplet, wetting each weed surface. Take special care to prevent
overdosing.

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. 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 no store near open containers of fertilizer, seed or other pesticides. 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.

Herbi" is a Trademark of North American Micron

WARRANTY

Seller 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 042704)