

OCT 29 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 Sweet Sixteen with Tri-Power Dry
EPA Registration No. 228-300
Your Resubmission of the Basic and Alternate
Confidential Statements of Formula
Correspondence Dated August 25, 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]. 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 mecoprop, or applicable salts thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised Confidential Statement(s) of Formula (Basic and Alternate Formulations, dated April 26, 1999 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	75D5C							
SURNAME	R. Sawyer							
DATE	10/29/99							

2 7 12

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

(Commercial Label)

RIVERDALE

SWEET SIXTEEN
WEED AND FEED WITH TRI-POWER® DRY

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE AND TURF FOOD COMBINATION WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS WHILE PROVIDING BOTH FAST AND LONG FEEDING ACTION.

Weeds contacted by this product gradually die and disappear from the lawn.

Treats (or covers) 5,000 Sq. Ft. (50' x 100')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS: *†	
2-Methyl-4-Chlorophenoxyacetic Acid	0.820%
(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid†	0.165%
Dicamba (3,6-Dichloro-o-Anisic Acid)	0.080%
INERT INGREDIENTS: 98.935%	
TOTAL	100.000%

*ISOMER SPECIFIC METHOD
†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

GUARANTEED ANALYSIS: °	
Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash (K ₂ O)	X%

Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.
Chlorine (Cl) Maximum X%

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

) Fertilizer guaranteed by (Name of Fertilizer registrant)

†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 BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET WEIGHT 16 LBS.

EPA REG. NO. 228-300

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY
GLENWOOD, ILLINOIS 60425-1584

ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 29 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-300

Revised 4/26/99 Converted MCPP to Optical Isomer.

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

Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.
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.

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect 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 contaminate water when disposing of equipment washwaters or rinsate. 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.

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

SWEET SIXTEEN WEED AND FEED WITH TRI-POWER® DRY is a stable mixture of three herbicides. It is for use on Lawns, Ornamental Turf, Golf Courses (Fairways, Aprons, Tees and Roughs) Parks, Cemeteries and other similar non-crop areas. Not for use on turf being grown for sale or other commercial uses as sod, or for commercial seed production, or for research purposes.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth in lawns and to control such broadleaf weeds as: Beggartick, Bindweed, Black medic, Buckhorn, Burcucumber, Burdock, Buttercup, Canadian thistle, Carpetweed, Catsear, Chervil, Chicory, Chickweed, Cinquefoil, Clover, Cocklebur, Croton, Daisy, Dandelion, Dock, Dog fennel, Dragonhead mint, English daisy, Fat hen, Fennel, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Halbert-leaved saltbush, Hawkweed, Healall, Heartleaf drymary, Hempnettle, Henbit, Hoary cress, Honeysuckle, Jimsonweed, Knotweed, Kochia, Lambsquarter, Mallow, Marshelder, Mexican poppy, Morningglory, Mustard, Nettle, Oxalis, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Prickly lettuce, Puncturevine, Purslane, Ragweed, Red clover, Red root, Red sorrel, Redstem, Sheep sorrel, Shepherdspurse, Sicklepod, Smartweed, Sneezeweed, Sow thistle, Spanishneedle, Speedwell, Spurge, Spurweed, Stinging nettle, Stinkweed, Stitchwort, Sunflower, Thistle, Thornapple, Toadflax, Veronica, Vetch, Whitebrush, White top, Wild aster, Wild carrot, Wild geranium, Wild gooseberry, Wild jute, Wild lettuce, Wild marigold, Wild onion, Wild petunia, Wild radish, Wild sage, Wild garlic, Wintercress, Witchweed, Wood sorrel, Yarrow, Yellow charlock, Yellow daisy, Yellow rocket.

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; espe-

cially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain, sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 16 pound bag should be used on 5000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is also acceptable.

The following settings are approximate for applying contents of this package at a suggested rate of 3.2 pounds per 1000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 sq. ft. and adjust to apply at the rate of .8 lb. per 250 sq. ft.

SPREADER SETTINGS

ONE PASS APPLICATION:

MAKE	SETTING
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

Sweep (do not wash) all fertilizer materials from surfaces immediately after application, because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 lb. nitrogen/1000 sq. ft.; otherwise, this information is optional.)

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing *(No. of lbs.) pounds of nitrogen per 1,000 square feet (optional P₂O₅ and K₂O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

*Based on Inert fertilizer claimed.

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near feed or foodstuffs. Do not store more than two pallets high. To prevent cross-contamination, do not store near open containers of fertilizers, seed or other pesticides. Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE DISPOSAL: If container is damaged or if pesticide has leaked, clean up all spilled material. 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(RV 042699)

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.

(Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

OPTIONAL MARKETING STATEMENTS:

Contains Tri-Power® Dry a Premium Broadleaf Herbicide

Environmental Benefits

(Grasscycling Logo)

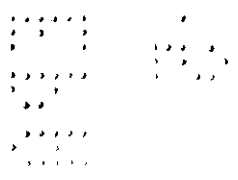
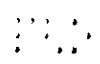
Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.

- ✓ A 50' x 50' lawn produces enough oxygen for a family of 4 every day
✓ Reduces Glare & Reduces Noise
✓ Traps Dust, Smoke Particles & other Pollutants
✓ Purifies Water & Modifies Temperature
Improves Soil Condition & Controls Erosion

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(Non-Commercial Label)

7 7 12

RIVERDALE

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Treats (or covers) 5,000 Sq. Ft. (50' x 100')

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INERT INGREDIENTS:	98.935%
TOTAL	100.000%

*ISOMER SPECIFIC METHOD

†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

GUARANTEED ANALYSIS: °

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash (K ₂ O)	X%

Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.
Chlorine (Cl) Maximum X%

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

) Fertilizer guaranteed by (Name of Fertilizer registrant)

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NET WEIGHT 16 LBS.

EPA REG. NO. 228-300

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 29 1990

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 228-300

Revised 4/26/99 Converted MCPP to Optical Isomer.

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ENVIRONMENTAL HAZARDS

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WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain, sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

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Environmental Benefits

(Grasscycling Logo)

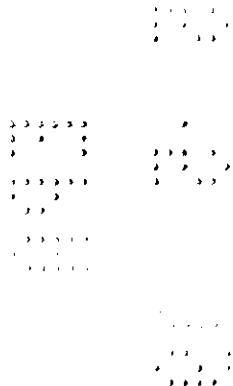
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ADDITIONAL MARKETING AND FERTILIZER CLAIMS

- Feeds your lawn while controlling weeds
- Controls dandelions, clover, ragweed, lambsquarter, and over 100 other weeds listed on the back panel

Greens Quick. Stays Green!

Pursell's Polyon Timed-Release Capsules

Our people and experience make for greener lawns.

At TruGreen-ChemLawn™ it is our people that make us America's Authority on Lawn Care™. The strength and experience of more than 10,000 employees have helped us to see and touch more than a millions acres of turf grass all across America. In our two nationally recognized research centers, we continue to test and develop new products for your lawn. Our fertilizers are specially customized to meet the specific climate and growing conditions in your area.

The people of Tru-Green-ChemLawn™ are proud to provide high quality products for your lawn care needs. Thank you for choosing us. If you are not totally satisfied with our product, we will gladly refund your money, just call us at 1-800-288-LAWN.

Sincerely,

The "Smart" Plant food
Patented Polymer Technology

Once dubbed by a competitor as the "single greatest invention in the history of lawn care," Pursell's POLYON® timed-release coating technology was developed after decades of searching for the "perfect" plant food . . . a fertilizer that would slowly and precisely feed with virtually no waste.

The "Smart" Plant Food

Each POLYON® "smart" green capsule is designed to release its contents by osmosis, nature's way of diffusing nutrients. With POLYON® capsules, the warmer the temperature, the faster the rate of fertilizer release . . . exactly matching the plants natural growth cycle.

Extra Long Lasting

Unlike most ordinary fertilizers which release most of their nutrients with the first passing shower, Pursell's POLYON® timed-release capsules resist rainfall, releasing slowly in precise daily dosages for up to three months . . . ensuring a thick, beautiful, healthy lawn that will be the envy of your neighborhood.

User Friendly

Pursell's POLYON® based fertilizer is easy to use--you simply spread it & forget it! No dust, no burn, no worry! The efficient timed-release system keeps nitrogen in the root zone until it is depleted . . . and it's completely biodegradable.

Questions? Lawn Care Hotline 1-800-288-LAWN

OUR EASY TO FOLLOW LAWN CARE SYSTEM:

You can have a greener, thicker lawn with ChemLawn's™ new annual system of lawn care designed by America's Authority on Lawn Care™. Just follow the 4 easy steps using TruGreen® by ChemLawn™ fertilizer products for guaranteed results!

Start Right Away!

Don't wait for the first step of the system! Simply use the recommended product during the current season to begin your program toward a better lawn.

Easy to Follow One step at a time, follow the easy to understand directions for use. Each product is specially formulated to provide you lawn with what it needs at just the right time of year.

CONTROLS MOST COMMON WEEDS, including Dandelions
Buckhorn, Chickweed, Dandelion, Henbit, Knotweed, Oxalis, Plantain, Ragweed, Spurge and
many others.

STEP 1

Apply Late Winter - Early Spring
TruGreen® Crabgrass Preventer + Lawn Fertilizer
Prevents crabgrass, foxtail, poa annua, spurge and other annual grasses while feeding your
lawn with a long-lasting, deep-greening controlled-release fertilizer.

STEP 2

Apply Mid - Late Spring
TruGreen® Weed & Feed
Kills over 100 varieties of weeds, roots, and all! Feeds with POLYON® controlled-release
nitrogen for longer lasting greening.

STEP 3

Apply Late Spring - Summer
TruGreen® Professional Lawn Fertilizer
Provides extended greening throughout the summer months with POLYON® controlled-release
nitrogen for dependable, predictable results!

STEP 4

Apply Fall
TruGreen® Professional Fall/Winter Fertilizer
Feeds your lawn during the critical winter months to help it better survive harsh weather
conditions. Encourages strong root development and earlier greening in the spring.

Satisfaction Guaranteed Or Your Money Back

If for ANY reason you are not satisfied with this product, please send the UPC bar code
from the bag and a cash register receipt to:

TruGreen-ChemLawn
ATTN: (person's name)
P.O. Box 17168
Memphis, TN 38187-0168

We'll promptly refund your money.

Available Exclusively Through

TruGreen-ChemLawn
Memphis, TN 38120-9792

- Eliminates weeds and feeds desirable grasses in one easy application.
- Controlled release nitrogen feeds grass longer.

