

000228-00301-052799

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Systems Integration Group, Inc.

DM 23 328-301 5/37/99 Page 18 10

MAY 27 1999

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

Dear Mr. Sawyer:

Subject:

Conversion from MCPP to MCPP-p

Riverdale Tri-Power® Dry Weed and Feed

EPA Registration Number: 228-301 Your Submission April 27, 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 our understanding 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 dated April 27, 1999. 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.
- 3. Agency records indicate that the MCPA source products (EPA Reg. No. 7969-34 and EPA Reg. No. 70596-1) listed on your Basic and Alternate formulation CSFs contain 96% and 96.6% MCPA acid, respectively, not 94% acid as shown on the CSFs. It appears that the 94% given for EPA Reg. No. 70596-1 on the Alternate formulation CSF is a typographical error, which we have corrected on our file copy. The 94% given for EPA Reg. No. 7969-34 does not appear to be a typographical error; however, since calculations based on the correct percentage of MCPA acid (96%) result in a product that is within the certified limits for MCPA, the CSF is acceptable. In the future you should correct this error.

Copies of the revised Confidential Statements of Formula (Basic and Alternate Formulations, dated 04/27/99) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

RD:STANTON:PM Team 23:Rm, 237:CM-2:305-5218:Disk #10:S562407

CONCURRENCES							
SYMBOL +	7505C	*************************	***************************************				
SURNAME >	S. Stanton						
DATE +	May 27, 1999						

EPA Form 1320-1 (12-70)

Stamped copies of the labeling (commercial and non-commercial labels) are enclosed for your records. Submit one copy of your final printed labels before you release the product for shipment.

Sincerely yours,

Susan 2. Starton for Joanne I. Miller

Product Manager (23)

Herbicide Branch

Registration Division (7505C)

Enclosure

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RIVERDALE

TRI-POWER® DRY WEED AND FEED

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 (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid† Dicamba (3,6-Dichloro-o-Anisic Acid)		0.060% 99. <u>185%</u>
*ISOMER SPECIFIC METHOD †CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-P.		
GUARANTEED ANALYSIS:° Total Nitrogen (N)		. Х%
Available Phosphate (P_2O_5)	ea, Urea,	X% Triple
Chlorine (Cl) Maximum		. X%
The urea nitrogen in this product has been coated to provide X% coated urea nitrogen.	I Slow rel	ease
Fertilizer guaranteed by (Name of Fertilizer registrant)		No. Skip
†TRI-POWER [®] IS A REGISTERED TRADEMARK OF RIVERDALE CHEMICAL COMPANY THE OPTICAL ADVANTAGE™ IS A TRADEMARK OF RIVERDALE CHEMICAL COMPANY	CEPTED COMMENTS Letter Dated 7 1999	oderal Insoctic ad Rodenticido , for the pesti oder EPA Reg. 8-30/
KEEP OUT OF REACH OF CHILDREN	A EPA C	the Figure 1
CAUTION	Z Z	nder meller glater
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT		5611
NET WEIGHT LBS.	* * * *	
EPA REG. NO. 228-301 EPA ES	ST. NO. 2	28-IL-1
MANUFACTURED BY		:
RIVERDALE CHEMICAL COMPANY		*****
GLENWOOD, ILLINOIS 60425-1584	4 + C C + C + C + C + C + C + C + C + C	(((,,
Revised 4/27/99 Converted MCPP to Optical Isomer.	•••••	

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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 SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water

and induce vomiting by touching back of throat with finger, or if

available, by administering syrup of ipecac. If person is unconscious, do

not give anything by mouth and do not induce vomiting.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation

persists.

IF ON SKIN: Wash promptly with plenty of soap and water and rinse thoroughly. 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.

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.

TRI-POWER® DRY WEED AND FEED 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.

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, Halbertleaved 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; 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

Page 3

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 20 (or 18) 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 <u>approximate</u> for applying contents of this package at a suggested rate of 4 pounds (3.6 pounds for 18# bag) 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 square feet and adjust to apply at the rate of 1 lb. (.9 lb. for 18# bag) per 250 square feet.

SPREADER SETTINGS ONE PASS APPLICATION:

<u>MAKE</u>	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 $\frac{\star (No.\ of\ lbs.)}{\star}$ pounds of nitrogen per 1,000 square feet (optional P_2O_5 and K_2O 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 and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near feed or foodstuffs. To prevent cross-contamination, do not store near open containers of fertilizers, seed, or other pesticides.

PESTICIDE DISPOSAL: To dispose of bag which contains unused product, securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse empty bag. Fold empty bag and discard in trash.

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.

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

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

The following note will not be part of the actual label copy.

*NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. Chlorine declaration and fertilizer guarantee are optional except where mandated by State fertilizer regulation.

Optional Front Panel and/or General Information Statements for Sales in California.

- 1. IN CALIFORNIA THIS PRODUCT IS LIMITED TO USE ONLY AROUND THE HOME.
- 2. IT IS FOR USE ON RESIDENTIAL LAWNS.

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NOTES: If sentence 1 is used, all uses may be used on label.

If sentence 2 is used, all other uses must be deleted.



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SPREADER CALIBRATIONS & P<u>ATTERNS</u>

Rotary spreader, like the kind TruGreen-ChemLawn™ technicians use, are the most preferred. These spreaders are easier to use and reduce the "streaking" problems associated with drop spreaders. Drop spreaders work well, but require more patience to avoid gaps and streaks. Streaks appear as irregular light green areas in the lawn a week or so after application. This comes from uneven fertilizer coverage. If using a drop spreader, be extra careful to avoid gaps in coverage.

To avoid gaps or streaks, first spread border of lawn. Fill in center with uniform, parallel passes.

Always apply with a properly calibrated rotary or drop type fertilizer spreader. Never apply by hand.

For best results, apply with a fertilizer spreader at the settings listed.

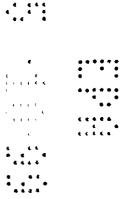
Washington State Only: This product has been registered with the Washington State Department of Agriculture. When applied as directed this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product.

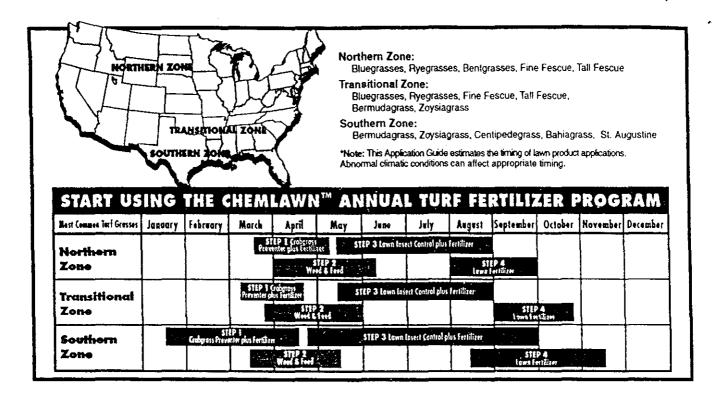
CONTAINS
TRU-RELEASE™
NITROGEN
FOR EXTENDED GREENING

SATISFACTION GUARANTEED

OR YOUR MONEY BACK

CHEMLAWN is committed to providing the highest quality of products. If you are not totally satisfied with our products, we will replace your product or refund your money. Just call us at 1-800-288-LAWN and we will be happy to help you.





CHEMLAWN ANNUAL TURF FERTILIZER PROGRAM THE APPLY LATE WINTER-LARLY SPRING CHEMLAWN Crabgrass Control + Lawn Fertilizer Prevents crabgrass, foxtail, poa annua, spurge and other annual grasses while feeding your lawn with long-lasting, deep-greening controlled-release nitrogen. THE APPLY MIDDLAT SPRING CHEMLAWN Weed & Feed' Kills over 100 species of weeds, roots and all! Feeds with controlled-release nitrogen for longer lasting greening. STEP APPLY LATE SPRING-SUMMER CHEMLAWN Lawn Insect Control + Fertilizer Controls insects while greening your lawn with controlled-release nitrogen for dependable, predictable results! CHEMLAWN Lawn Fertilizer Provides extended greening throughout the summer months with controlled-release nitrogen for dependable, predictable results! *Chemlawn** St. Augustine Weed & Feed can be used as Step 2 in your annual program ONLY on St. Augustine and centipede lawns.

(Commercial Label)

RIVERDALE

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

GET THE OPTICAL ADVANTAGE"

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KEEP OUT OF REACH OF CHILDREN

CAUTION

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

NET WEIGHT LBS.

EPA REG. NO. 228-301		EPA EST. NO. 228-IL-1
ACCEPTED with COMMENTS In EPA Letter Dated	MANUFACTURED BY RIVERDALE CHEMICAL COMPANY	•:••
MAY 2.7 1999 Under the Federal Insecticide, Fundicide, and Redenticide Act as amended, for the posticide registered under EPA Reg. No. 228-30/	GLENWOOD, ILLINOIS 60425-1584	
Revised 4/27/99 Converted MC	CPP to Optical Isomers.	• • • • • • • • • • • • • • • • • • • •

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IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water

and induce vomiting by touching back of throat with finger, or if available, by administering syrup of ipecac. If person is unconscious, do not

give anything by mouth and do not induce vomiting.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation

persists.

IF ON SKIN: Wash promptly with plenty of soap and water and rinse thoroughly. 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. When cleaning equipment, do not pour 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 or rinsate.

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 these 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

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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 water 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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SPREAD	ER SE	TTINGS
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Scotts Calibrated	4

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*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 stack more than two pallets high. To prevent cross-contamination, do not store near open containers of fertilizers, seeds or other pesticides. Do not contaminate water, food or feed by storage or 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.

Riverdale TRI-POWER® DRY Weed and Feed (Commercial)

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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 042799)

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply pro-

duct 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

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OPTIONAL MARKETING STATEMENTS:

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Environmental Benefits (Grasscouling

(Grasscycling Logo)

benefits to your home and environment:

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20% of the volume in our nation's landfills. To do
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