

228-304

3/24/2003

1/9



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

MAR 24 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Russell F. Sawyer
Nufarm Americas Inc.
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60521-0866

Dear Mr. Sawyer:

Subject: Revised Label
Riverdale 3-Way Weed and Feed With Tri-Power
EPA Registration Number 228-304
Your Submission Dated March 7, 2003

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- Delete "and similar non-crop areas". This phrase implies that this product could be applied to sites other than ornamental turf.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

A handwritten signature, likely of Donald R. Stubbs, is written in ink. It consists of a stylized 'D' followed by a vertical line and a small flourish.

Donald R. Stubbs, Chief
Herbicide Branch
Registration Division (7505C)

Enclosure

(Non-Commercial Label)

RIVERDALE®

3-WAY WEED AND FEED WITH TRI-POWER®

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.

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

Treats (or covers) 2,500 Sq. Ft. (50' x 50')

GET THE OPTICAL ADVANTAGE®

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	0.404%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.079%
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***	0.036%
INERT INGREDIENTS:	99.481%
TOTAL	100.000%

ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2-Methyl-4-Chlorophenoxyacetic Acid	0.330%
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.065%
***3,6-Dichloro-o-Anisic Acid	0.030%

†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)

Riverdale, Tri-Power and The Optical Advantage are Registered Trademarks of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAR 24 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
amended, for the pesticide
registered under EPA Reg. No.
228-304

NET WEIGHT LBS.

EPA REG. NO. 228-304

EPA EST. NO. 228-IL-1

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

Revised 3/7/03 Changed First Aid Statement per PR 2001-1 and Disposal Statement per PR 2001-6, also redefined Ornamental Turf per EPA's request via Amendment.

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

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

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 OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

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.

3-WAY WEED AND FEED WITH TRI-POWER® is a stable mixture of three herbicides. It is for use on Ornamental Turf, such as Lawns, Parks, Cemeteries, Golf Courses (Fairways, Aprons, Tees, and Roughs) and 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 control many broadleaf weeds such as: Beggartick, Bindweed, Black medic, Buckhorn, Burcucumber, Burdock, Buttercup, Canadian thistle, Carpetweed, Catsear, Chervil, Chicory, Chickweed, Cinquefoil, Clover, Cocklebur, Croton, Daisy, Dandelion, Dock, Dogfennel, 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, Marsh elder, 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, Spanish needle, 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 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 pound bag should be used on 2500 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 8 pounds per 1000 square feet. Settings are based on an average walking speed. Reduce settings for slower speed; raise settings for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 2 lb. per 250 square feet.

SPREADER SETTINGS

ONE PASS APPLICATION:*

<u>MAKE</u>	<u>SETTING</u>
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 square feet; 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.

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

STORAGE AND DISPOSAL

STORAGE: Store in original container 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 fertilizer, seed, or other pesticide.

DISPOSAL: If empty - Do not reuse this container. Place in trash or offer for recycling if available. If partly filled - If product cannot be used as directed, or offered to others for their use, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

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 030703)

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® A Premium Broadleaf Herbicide

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.

(Non-Commercial Label)

RIVERDALE®

3-WAY WEED AND FEED WITH TRI-POWER®

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.

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

Treats (or covers) 2,500 Sq. Ft. (50' x 50')

GET THE OPTICAL ADVANTAGE®

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	0.404%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.079%
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***	0.036%
INERT INGREDIENTS:	99.481%
TOTAL	100.000%

ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2-Methyl-4-Chlorophenoxyacetic Acid	0.330%
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.065%
***3,6-Dichloro-o-Anisic Acid	0.030%

†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)	

Riverdale, Tri-Power and The Optical Advantage are Registered Trademarks of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS

NET WEIGHT LBS.

EPA REG. NO. 228-304

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAR 24 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
amended, for the pesticide
registered under EPA Reg. No.
228-304

EPA EST. NO. 228-IL-1

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

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

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

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
OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

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.

3-WAY WEED AND FEED WITH TRI-POWER® is a stable mixture of three herbicides. It is for use on Ornamental Turf, such as Lawns, Parks, Cemeteries, Golf Courses (Fairways, Aprons, Tees, and Roughs) and 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 control many broadleaf weeds such as: Beggartick, Bindweed, Black medic, Buckhorn, Burcucumber, Burdock, Buttercup, Canadian thistle, Carpetweed, Catsear, Chervil, Chicory, Chickweed, Cinquefoil, Clover, Cocklebur, Croton, Daisy, Dandelion, Dock, Dogfennel, 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, Marsh elder, 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, Spanish needle, 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.

8/9

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.

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 pound bag should be used on 2500 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 8 pounds per 1000 square feet. Settings are based on an average walking speed. Reduce settings for slower speed; raise settings for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 2 lb. per 250 square feet.

SPREADER SETTINGS

ONE PASS APPLICATION:

<u>MAKE</u>	<u>SETTING</u>
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 square feet; 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.

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

STORAGE AND DISPOSAL

STORAGE: Store in original container 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 fertilizer, seed, or other pesticide.

DISPOSAL: If empty - Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled** - If product cannot be used as directed, or offered to others for their use, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

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 030703)

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® A Premium Broadleaf Herbicide

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.