UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Dear Mr. Sawyer:

AUS 4 1999

Subject:

Conversion from MCPP to MCPP-p

Riverdale Triplet MC DRI Weed and Feed

EPA Registration Number: 228-318 Your Submission Dated April 30, 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 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 Statement of Formula (Basic and Alternate #1 Formulation, dated 04/30/99) has been placed in the Agency's file for the subject product. This basic CSF supersedes all previously submitted CSFs for this product.

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SYMBOL .	7505C			]			]	,
SURNAME >	MHoward			<b>)</b>	]	}	]	
DATE +	Aug 3, 1999							

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

A stamped copy of the labeling is enclosed for your records. Submit one (1) 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

**\*** i

# (Commercial Label)

# RIVERDALE

# TRIPLET® MC DRI 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 Square Feet (50' x 100')

# GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:*†  2,4-Dichlorophenoxyacetic Acid
*ISOMER SPECIFIC METHOD <b>†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.</b>
GUARANTEED ANALYSIS: Total Nitrogen (N)
Available Phosphate $(P_2O_5)$
Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.  Chlorine (Cl) Maximum
The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.
Fertilizer guaranteed by (Name of Fertilizer registrant)
TRIPLET® 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 WRIGHT LBS.

EPA REG. NO. 228-318

RPA RST. NO. 228-IL-1

MANUFACTURED BY

ACCEPTED
with COMMENTS
In EPA Letter Dated

RIVERDALE CHEMICAL COMPANY

AUG 4 1999

GLENWOOD, ILLINOIS 60425-1584

Under the Federal Insecticide, Fundicide, and Redemicide Act as amended, for the poeticide registered under EPA New No.

228-3/8 Revised 4/30/99 Converted MCPP to Optical Isomer. Riverdale TRIPLET® MC DRI Weed and Feed (Commercial)

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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. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. 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 dust has settled.

# 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. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

# ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect nontarget 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. When cleaning equipment, do not pour the washwater on the round; spray or drain over a large area away from wells and other water sources.

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 phenoxy pesticides 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 grounwater 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 DRI 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 control many broadleaf weeds such as: Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, Biden, Bindweed, Bitterweed, Bitter wintercress, Black medic, Blessed thistle, Blue lettuce, Box elder, Broomweed, Buckhorn, Bull thistle, Burdock, Bur ragweed, Buttercup, Canada thistle, Carpetweed, Catnip, Chickweed, Chicory, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common sowthistle, Creeping jenny, Croton, Curly indigo, Dandelion, Dock, Dogpane, Dogfennel, Elderberry, English daisy, Flea bane (daisy), Flixweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Gumweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Gumweed, Florida pusley, Heartleaf drymary, Hemp, Henbit, Hoary cress, Honeysuckle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarter, Locoweed, Lupina, Mallow, Marshelder, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nutgrass, Orange hawkweed, Oxalis, Parsnip, Pennycress, Pennywort, Peppergrass, Pepperweed, Piqweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prickly lettuce, Primrose, Puncture vine, Purslane, Ragweed, Red clover, Red sorrel, Rush, Russian thistle, St. Johnswort, Sheep sorrel, Shepherdspurse, Smartweed, Sneezeweed, Southern wild

rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spurge, Spurweed, Stinkweed, Stitchwort, Sumac, Sunflower, Sweet clover, Tarweed, Thistle, Toadflax, Tumbleweed, Velvet leaf, Veronica, Vervain, Vetch, Virginia buttonweed, Virginia creeper, Wild aster, Wild carrot, Wild garlic, Wild geranium, Wild lettuce, Wild onion, Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Willow, Witchweed, Woodsorrel, Wormseed, Yarrow, Yellow rocket, and other broadleaf weeds.

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 addivered 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. Augustinegrasses. 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 5,000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, crisscrossing 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 1,000 square feet. These settings are furnished only as a guide. Age, spreader condition, operating speed, and unevenness of terrain can cause variation in applied rates. 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 pound (.9 lb. for 18# bag) per 250 square feet.

# 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 pound of nitrogen/1,000 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  $\frac{\star (No.\ of\ lbs.)}{\star}$  pounds of nitrogen per 1,000 square feet (optional  $P_2O_s$  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 in a secured warehouse or storage building. Do not store near open containers of fertilizers, seeds, or other pesticides. Do not stack 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, clean up all spilled material. 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: 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 away from 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 043099)

# OPTIONAL SPREADER INSTRUCTIONS:

For Drop Spreaders: First apply two strips at ends. Then apply (Illustration) 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 Triplet® MC Dri - A Premium Broadleaf Herbicide

# Environmental Benefits

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 ✓ A 50' x 50' lawn produces enough 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.

- 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 except as noted.

°NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. If Spreader Settings are deleted, the following sentence must be added: "Read your spreader product manual for proper settings and use instructions." Chlorine declaration is optional except where mandated by State fertilizer regulation.

### (Non-Commercial Label)

#### RIVERDALE

# TRIPLET® MC DRI 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 Square Feet (50' x 100')

# GET THE OPTICAL ADVANTAGE"

ACTIVE INGREDIENTS:*†  2,4-Dichlorophenoxyacetic Acid
*ISOMER SPECIFIC METHOD <b>†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.</b>
GUARANTEED ANALYSIS: $^\circ$ Total Nitrogen (N)
The urea nitrogen in this product has been coated to provide $X^*$ coated slow release urea nitrogen.
Fertilizer guaranteed by (Name of Fertilizer registrant)
†TRIPLET <sup>®</sup> 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 LBS.

**EPA REG. NO. 228-318** 

EPA EST. NO. 228-IL-1

ACCEPTED
with COMMENTS
In EPA Letter Dated

AUG ~ 4 1999

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

Under the Federal Insceticide, Fundicide, and Rodenticisic Act as amended, for the porticide registered under EPA Reg. No. 228-3/8 Riverdale TRIPLET® MC DRI Weed and Feed (Non-Commercial)

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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. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. 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 dust has settled.

#### 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. Call a physician if irritation persists.

IF ON SRIN: Wash with plenty of soap and water. Get medical attention.

# ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect nontarget 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.

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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;

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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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MAKE	<u>SETTING</u>
Central Calibrated Cyclone Broadcast	5 3 <i>-</i> 3/4
Jackson	5
	Central Calibrated Cyclone Broadcast

Sears

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.

Scotts Calibrated

(The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 pound of nitrogen/1,000 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  $\frac{*(No.\ of\ lbs.)}{}$  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 a locked storage area inaccessible to children and domestic animals. To prevent cross-contamination, do not store near open containers of fertilizers, seeds or other pesticides. Do not stack more than two pallets high.

**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.

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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 043099)

# 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.

Besides increasing property values, did you know a well-maintained lawn provides the

(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 Triplet® MC Dri - A Premium Broadleaf Herbicide

# Environmental Benefits Grassoville

(Grasscycling Logo) 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

- ✓ 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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back into your lawn.

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