

228-504

9/17/2008

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



Office of Pesticide Programs

SEP 17 2008

Nufarm Americas Inc.
150 Harvester Drive
Suite 200
Burr Ridge, IL 60527

Subject: EPA Reg. 228-504 [Triplet® Low Odor Premium Weed and Feed (20/5)]/ 2,4-D RED Label Amendment

The labeling referred to above is in compliance with the 2,4-D RED provided that you:

- 1) Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
- 2) Please note: Final product reregistration can't be considered until after all active ingredients in this product are eligible for reregistration.
- 3) Make the following revisions to the product label:
 1. Under the ingredient statement, add a listing of the number of pounds of each active ingredient acid equivalent in each pound of product.
 2. Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read: "CAUTION Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear long sleeved shirt, long pants, socks, shoes, and chemical resistant gloves made of any waterproof material when applying this product. After using this product, remove clothing and launder separately before reuse. Wash the outside of gloves before removing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
 3. You must either remove the product from the scope of WPS by adding the text below or add an Agricultural Use Requirements box with the appropriate REI (48 hours) and early entry PPE (coveralls, shoes plus socks, chemical-resistant gloves made of any waterproof material and protective eyewear) for the sod farm use:

"Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes."
 4. Unless removed from the scope of WPS, as described above, a PPE section must be added, which reads:

"All loaders, applicators and other handlers must wear:

 - Long-sleeved shirt and long pants,

- Shoes and socks, and
- Chemical-resistant gloves made of any waterproof material

Additionally, unless the product is removed from the scope of WPS, a User Safety Requirements box must be added, containing the following:
"Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry."

5. Page 4, remove the statement "Environmental Benefits" above the grasscycling logo.

6. Per the MCPP-p and 2,4-D REDs, the first 2 sentences of the Environmental Hazards section of the label must be revised to read:

"This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark."

7. Remove the phrase, "except as noted on appropriate labels" from the environmental statement.

8. Per the REDs for the combined active ingredients in this product, the following rate restrictions must be added to the label, and any conflicting text must be removed:

"Limited to 2 applications per year.
Maximum of 1.5 lb ae 2,4-D per acre per application."

9. Per the MCPP-p RED, a 30 day minimum retreatment interval must be added to the application restriction section of the label.

10. Delete the word, "approximately," before "30 days" on page 3, in the "When to apply" section.

11. Per the MCPP-p RED, the following text must be added to the "How to apply" section of the label:

"Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn or garden, and sweep any product landing on the driveway, sidewalk, gutter, or street, back onto the treated area. To prevent product run-off, do not over water the treated area to the point of runoff or apply when raining or when rain is expected that day."

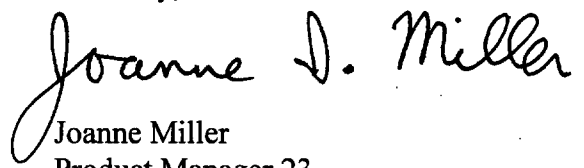
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA Sec. 6(e). Your release of the product for shipment constitutes acceptance of these conditions.

EPA Reg. 228-504
Comments, page 3

A stamped copy of the label is enclosed for your records. Submit one copy of the final printed label before the product is released for shipment.

If you have any questions, please contact Kathryn Montague (703-305-1243 or montague.kathryn@epa.gov).

Sincerely,



Joanne Miller
Product Manager 23
Herbicide Branch
Registration Division (7505P)

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TRIPLET[®] LOW ODOR PREMIUM WEED AND FEED (20/5)

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.

CONTAINS 2,4-D, MECOPROP-p AND DICAMBA

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:

Triisopropanolamine Salt of 2,4-D Acid*	1.3382%
Dimethylamine Salt of Mecoprop-p Acid**†	0.2170%
Dicamba Acid***	0.0717%

OTHER INGREDIENTS:	98.3731%
TOTAL:	100.0000%

Isomer Specific Method, Equivalent to:

*2,4-D Acid	0.7174%
**Mecoprop-p Acid	0.1793%
***Dicamba Acid	0.0717%

†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 (List sources)	
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)	

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 228-504
EPA EST. NO. 228-IL-1

MANUFACTURED BY
NUFARM AMERICAS INC.
150 HARVESTER DRIVE
BURR RIDGE, IL 60527



NET CONTENTS 20 LBS.

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:

SEP 17 2008

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

000228-00504.20071109.EPA24D.Pending
NUP 7G 04

228-504

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

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear pants, 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; also before eating, drinking, chewing gum, or using tobacco.

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	

ENVIRONMENTAL HAZARDS

This pesticide may be toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This product has properties and characteristics associated with chemicals detected in groundwater. The use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

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.

Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until dusts have settled.

This product is a stable mixture of three herbicides. It is for use on residential turf.

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.

WEEDS CONTROLLED

- | | | | |
|----------------------------|--------------------|------------------------|-------------------|
| Alder | Broadleaf dock | Cockle | False sunflower |
| Annual yellow sweet clover | Broadleaf plantain | Cocklebur | Fiddleneck |
| Artichoke | Broomweed | Coffeebean | Field bindweed |
| Aster | Buckhorn | Coffeeweed | Field pansy |
| Austrian fieldcress | Buckhorn plantain | Common chickweed | Flea bane (Daisy) |
| Bedstraw | Bulbous buttercup | Common mullein | Flixweed |
| Beggartick | Bull nettle | Common sowthistle | Florida betony |
| Biden | Bull thistle | Corn chamomile | Florida pusley |
| Bindweed | Burdock | Creeping Jenny | Frenchweed |
| Bird vetch | Burning nettle | Crimson clover, croton | Galinsoga |
| Bitterweed | Bur ragweed | Cudweed | Garlic mustard |
| Bitter wintercress | Burweed | Curly dock | Goathead |
| Black-eyed Susan | Buttercup | Curly indigo | Goatsbeard |
| Black medic | Canada thistle | Dandelion | Goldenrod |
| Black mustard | Carolina geranium | Dead Nettle | Ground ivy |
| Blackseed plantain | Carpetweed | Dock | Gumweed |
| Blessed thistle | Catchweed bedstraw | Dogbane | Hairy bittercress |
| Blue lettuce | Catsear | Dogfennel | Hairy fleabane |
| Blue vervain | Catnip | Elderberry | Hawkweed |
| Box elder | Chickweed | English daisy | Healall |
| Bracted plantain | Chicory | Fall dandelion | Heartleaf drymary |
| Brassbuttons | Cinquefoil | False dandelion | Hedge bindweed |
| Bristly oxtongue | Clover | False flax | Hedge mustard |

(Continued)

WEEDS CONTROLLED (Continued)

Hemp	Parsnip	Sheep sorrel	Velvet leaf
Henbit	Pearlwort	Shepherdspurse	Venice mallow
Hoary cress	Pennycress	Slender plantain	Veronica
Hoary plantain	Pennywort	Smallflower galinsoga	Vervain
Hoary vervain	Peppergrass	Smartweed	Vetch
Honeysuckle	Pepperweed	Smooth dock	Virginia buttonweed
Hop clover	Pigweed	Smooth pigweed	Virginia creeper
Horsenettle	Pineywoods bedstraw	Sneezeweed southern wild rose	Virginia pepperweed
Horsetail	Plains coeopsis	Sowthistle	Wavyleaf bullthistle
Indiana mallow	Plantain	Spanishneedle	Western clematis
Ironweed	Poison hemlock	Spatterdock	Western salsify
Jewelweed	Poison ivy	Speedwell	White clover
Jimsonweed	Poison oak	Spiny amaranth	White mustard
Kochia	Pokeweed	Spiny cocklebur	Wild mustard
Knawel	Poorjoe	Spotted catsear	Wild aster
Knotweed	Povertyweed	Spotted knapweed	Wild buckwheat
Lambsquarter	Prickly lettuce	Spotted spurge	Wild carrot
Lespedeza	Prickly sida	Spurge	Wild four-o'clock,
Locoweed	Primrose	Spurweed	Wild geranium
Lupine	Prostrate knotweed	Stinging nettle	Wild lettuce
Mallow	Prostrate pigweed	Stinkweed	Wild marigold
Marshelder	Prostrate spurge	Stichwort	Wild parsnip
Matchweed	Prostrate vervain	Strawberry clover	Wild radish
Mexicanweed	Puncture vine	Sumac	Wild rape
Milk vetch	Purslane	Sunflower	Wild strawberry
Milkweed bloodflower	Ragweed	Sweet clover	Wild sweet potato
Mugwort	Red clover	Tall nettle	Wild vetch
Morningglory	Redroot pigweed	Tall vervain	Willow
Mouseear chickweed	Red sorrel	Tansy mustard	Witchweed
Musk thistle	Redstem filaree	Tansy ragwort	Woolly morningglory
Mustard	Rough cinquefoil	Tanweed	Woodsorrel
Narrowleaf plantain	Rough fleabane	Tarweed	Woolly croton
Narrowleaf vetch	Roundleaved marigold	Thistle	Woolly plantain
Nettle	Rush	Tick trefoil	Wormseed
Nutgrass	Russian pigweed	Toadflax	Yarrow
Orange hawkweed	Russian thistle	Trailing crown vetch	Yellow Rocket
Oxalis	St. Johnswort	Tumble mustard	Yellow flower pepperweed
Oxeye daisy	Scarlet pimpernel	Tumble pigweed	and other broadleaf weeds
Parsley-piert	Scotch thistle	Tumbleweed	

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 5,000 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 4 pounds 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 per 250 square feet.

**SPREADER SETTINGS
ONE PASS APPLICATION***

MAKE	SETTING
Earthway	5
Scotts	3-3/4
Cyclone	5
Republic	3
Sears	5
Red Devil (Precision)	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 nitrogen per 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 *(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

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE 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 fertilizer, seed or other pesticides. Do not stack more than two pallets high.

PESTICIDE DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

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TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(110907A)

Triplet and The Optical Advantage are registered trademarks of Nufarm Americas Inc.

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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.

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 MARKETING HYPE - FRONT PANEL

- Patented Low Odor Formulation
- Low Odor Formulation
- Now With Patented Low Odor Formulation
- Kills Over 250 Weed Types
- Kills 250+ Weed Types
- Kills Over 250 Weed Listed
- Kills Over 250 Weeds
- Kills All Major Broadleaf Weeds
- Kills Dandelion, Clover and Other Broadleaf Weeds
- Kills Dandelion, Clover and Other Listed Broadleaf Weeds
- Controls Over 250 Weeds
- Use When Weeds Are Actively Growing
- May Be Used on Bahia, Common Bermuda, Bluegrass, Centipede, Fescue, Ryegrass, St. Augustine and Zoysia Grass
- Controls Weeds Such As Dandelions, Chickweed, Henbit, Oxalis, Plantain, And Many More
- Overnight Results
- Works in 24 Hours
- Kills the Weeds, Not the Lawn
- Rainproof in Hours - Won't Wash Away
- Won't Harm the Home Lawn
- Illustration(s) of various weeds listed on label
- Contains Triplet Low Odor Formula
- Easy to Use
- For Thick, Weed-Free Turf
- Three Way Control
- Apply to a Moist Lawn
- Contains The Three Way Power of Triple Low Odor
- 20 lb. Bag Treats Up To 5,000 Square Feet (XXX bag covers up to XX,XXX square feet.)
- New Formulation
- Specially formulated for residential use.