

228-505

9/23/2008

1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 23 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Subject: Label Amendment for RED: 2,4-D, Mecoprop, and Dicamba
Triplet Low Odor L.A. Herbicide Premium Weed and Feed 16/5
EPA Registration No. 228-505

Dear Mr. Meindl:

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 make the following changes:

- Make all of the changes specified in the attached document "Summary of Comments on Layout 1".

Please note that final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

A stamped copy of your labeling is enclosed for your records. Submit one copy of the revised final printed label for the record before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,

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

Summary of Comments on Layout 1

Page: 2

Author: tsnyder
Subject: Note
Date: 9/19/2008 8:21:18 AM
 Add text at blue edit marks.

Author: tsnyder
Subject: Inserted Text
Date: 9/19/2008 8:19:35 AM
 long-sleeved

Author: tsnyder
Subject: Inserted Text
Date: 9/19/2008 8:19:16 AM
 long

Author: tsnyder
Subject: Cross-Out
Date: 9/19/2008 8:17:38 AM


Author: tsnyder
Subject: Cross-Out
Date: 9/19/2008 8:18:05 AM


Author: tsnyder
Subject: Inserted Text
Date: 9/19/2008 8:17:15 AM
 and may adversely affect nontarget plants

Author: tsnyder
Subject: Replacement Text
Date: 9/19/2008 8:16:44 AM
 is

Author: tsnyder
Subject: Note
Date: 9/19/2008 8:22:22 AM
 Add the following text:

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 run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.

Page: 3

Author: tsnyder
Subject: Note
Date: 9/19/2008 8:35:34 AM

 See inserted text at blue edit marks.

Author: tsnyder
Subject: Inserted Text
Date: 9/19/2008 8:36:24 AM

 Do not apply more than twice per year. A minimum of 30 days is required between treatments.

Author: tsnyder
Subject: Replacement Text
Date: 9/19/2008 8:37:05 AM

 after a minimum of

Author: tsnyder
Subject: Replacement Text
Date: 9/19/2008 8:13:49 AM

 specified

Page: 5

Author: tsnyder
Subject: Note
Date: 9/22/2008 10:47:47 AM
 Add text at blue edit mark.

Author: tsnyder
Subject: Inserted Text
Date: 9/19/2008 2:09:02 PM
T_A, to the extent consistent with applicable law,

Author: tsnyder
Subject: Note
Date: 9/22/2008 10:48:18 AM
 Add text at blue edit mark.

Author: tsnyder
Subject: Inserted Text
Date: 9/19/2008 9:26:35 AM
T_A To the extent consistent with applicable law,

TRIPLET® LOW ODOR L.A. PREMIUM WEED AND FEED (16/5)

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) up to 5,000 Square Feet (50' x 100')

GET THE OPTICAL ADVANTAGE®

ACTIVE INGREDIENTS:

Triisopropanolamine Salt of 2,4-D Acid*	1.44%
Dimethylamine Salt of Mecoprop-p Acid**†	0.23%
Dicamba Acid***	0.07%

OTHER INGREDIENTS:	98.26%
TOTAL:	100.00%

Isomer Specific Method, Equivalent to:

*2,4-D Acid	0.7728%
**Mecoprop-p Acid	0.1932%
***Dicamba Acid	0.0772%

†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. 228-505
EPA EST. NO. 228-IL-1

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
SEP 23 2008

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



NET CONTENTS 16 LBS.

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

000228-00505.20071112.Pending
NUP 7J 04

228-505

**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	Fail 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	Roundleafed 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 16 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 3.2 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 0.8 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.

(111207A)

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

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

16 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.