

**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 20/5  
EPA Registration No. 228-507

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 409-Triplet Master Label.qxd".

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,


A handwritten signature in black ink that reads "Joanne J. Miller".


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


# Summary of Comments on 409-Triplet Master Label.qxd


Page: 2


Author: tsnyder  
Subject: Note  
Date: 9/18/2008 3:44:14 PM  
 Add text at blue edit marks.


Author: tsnyder  
Subject: Inserted Text  
Date: 9/19/2008 8:20:01 AM  
 long-sleeved


Author: tsnyder  
Subject: Inserted Text  
Date: 9/18/2008 3:43:41 PM  
 long

Author: tsnyder  
Subject: Cross-Out  
Date: 9/18/2008 3:23:00 PM  


Author: tsnyder  
Subject: Cross-Out  
Date: 9/18/2008 3:23:54 PM  


Author: tsnyder  
Subject: Inserted Text  
Date: 9/18/2008 3:22:49 PM  
 and may adversely affect nontarget plants.


Author: tsnyder  
Subject: Replacement Text  
Date: 9/18/2008 3:21:08 PM  
 product is

Author: tsnyder  
Subject: Note  
Date: 9/18/2008 3:28:52 PM  
 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


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Author: tsnyder  
Subject: Note  
Date: 9/19/2008 8:33:58 AM  
 See inserted text at blue edit marks


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Author: tsnyder  
Subject: Inserted Text  
Date: 9/19/2008 8:33:36 AM  
 Do not apply more than twice per year. A minimum of 30 days is required between treatments.

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Author: tsnyder  
Subject: Replacement Text  
Date: 9/18/2008 3:32:48 PM  
 after a minimum of


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Author: tsnyder  
Subject: Replacement Text  
Date: 9/18/2008 3:33:12 PM  
 specified

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# Page: 5


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Author: tsnyder  
Subject: Note  
Date: 9/19/2008 9:08:21 AM  
 Add text at blue edit mark.

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Author: tsnyder  
Subject: Inserted Text  
Date: 9/19/2008 9:07:03 AM  
**T** to the extent consistent with applicable law,

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Author: tsnyder  
Subject: Note  
Date: 9/19/2008 9:08:55 AM  
 Add text at blue edit mark.

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Author: tsnyder  
Subject: Inserted Text  
Date: 9/19/2008 9:07:38 AM  
**T** To the extent consistent with applicable law,

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5/10

# TRIPLET<sup>®</sup> LOW ODOR L.A. 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) up to 5,000 Square Feet (50' x 100')

GET THE OPTICAL ADVANTAGE<sup>®</sup>

**ACTIVE INGREDIENTS:**

Triisopropanolamine Salt of 2,4-D Acid* .....	1.0705%
Dimethylamine Salt of Mecoprop-p Acid**† .....	0.1735%
Dicamba Acid*** .....	0.0573%

<b>OTHER INGREDIENTS:</b> .....	98.6987%
<b>TOTAL:</b> .....	100.0000%

Isomer Specific Method, Equivalent to:

*2,4-D Acid .....	0.5739%
**Mecoprop-p Acid .....	0.1434%
***Dicamba Acid .....	0.0573%

†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

**GUARANTEED ANALYSIS:°**

Total Nitrogen (N) .....	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ) .....	X%
Soluble Potash (K <sub>2</sub> 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. 228-507  
EPA EST. NO. 228-IL-1

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

SEP 23 2008

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

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



NET CONTENTS 20 LBS.

000228-00507.20071112.EPA24D.Pending  
NUP 7L 04

228-507

### 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	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
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 plantain	Coffeebean	Field pansy
Annual yellow sweet clover	Broomweed	Coffeeweed	Flea bane (Daisy)
Artichoke	Buckhorn	Common chickweed	Flixweed
Aster	Buckhorn plantain	Common mullein	Florida betony
Austrian fieldcress	Bulbous buttercup	Common sowthistle	Florida pusley
Bedstraw	Bull nettle	Corn chamomile	Frenchweed
Beggartick	Bull thistle	Creeping Jenny	Galinsoga
Biden	Burdock	Crimson clover, croton	Garlic mustard
Bindweed	Burning nettle	Cudweed	Goathead
Bird vetch	Bur ragweed	Curly dock	Goatsbeard
Bitterweed	Burweed	Curly indigo	Goldenrod
Bitter wintercress	Buttercup	Dandelion	Ground ivy
Black-eyed Susan	Canada thistle	Dead Nettle	Gumweed
Black medic	Carolina geranium	Dock	Hairy bittercress
Black mustard	Carpetweed	Dogbane	Hairy fleabane
Blackseed plantain	Catchweed bedstraw	Dogfennel	Hawkweed
Blessed thistle	Catsear	Elderberry	Healall
Blue lettuce	Catnip	English daisy	Heartleaf drymary
Blue vervain	Chickweed	Fall dandelion	Hedge bindweed
Box elder	Chicory	False dandelion	Hedge mustard
Bracted plantain	Cinquefoil	False flax	Hemp
Brassbuttons	Clover	False sunflower	Henbit
Bristly oxtongue	Cockle	Fiddleneck	Hoary cress
Broadleaf dock	Cocklebur	Field bindweed	Hoary plantain

(Continued)

**WEEDS CONTROLLED (Continued)**

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

**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:**

<b>MAKE</b>	<b>SETTING</b>
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 P<sub>2</sub>O<sub>5</sub> and K<sub>2</sub>O 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.

**LIMITATION OF LIABILITY**

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.

19/10

**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.