

NOV 16 2000

Russell F. Sawyer
 Riverdale Chemical Co.
 425 West 194th St.
 Glenwood, IL 60425-1584

Dear Mr. Sawyer:

SUBJECT: Conversion from MCPP to MCPP-p
 Strike 3
 EPA Reg. No. 14774-2
 Your Submission Dated August 18, 2000

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 forms [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 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.

It is noted, as you mentioned in your cover letter, that you did not enclose an amended CSF because this product's formulation is a 100% repack of the Riverdale product, Triplet SF (EPA Registration No. 228-312). Your latest approved basic CSF on file is dated August 1996.

| CONCURRENCES | | | | | | | | |
|--------------|----------|--|--|--|--|--|--|--|
| SYMBOL ▶ | 7505C | | | | | | | |
| SURNAME ▶ | Malyan | | | | | | | |
| DATE | 11/21/00 | | | | | | | |

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

)

Low Odor

Strike 3™

**Selective Broadleaf Weed Control For Turfgrasses including for use on Sod Farms.
To Control Dandelion, Clover, Henbit, Plantains, Wild Onion, and Many Other Broadleaf Weeds.
Also for Highways, Rights-of-Way and Other Similar Non-Crop Areas**

Contains 2, 4-D, Mecoprop-p and Dicamba

ACTIVE INGREDIENTS:

| | |
|---|----------------|
| Dimethylamine salt of 2, 4 dichlorophenoxyacetic acid* | 30.56% |
| Dimethylamine salt of (+)-R- 2- (2-methyl-4-chlorophenoxy) propionic acid**†..... | 8.17% |
| Dimethylamine salt of dicamba (3, 6-dichloro-o-anisic acid)*** | 2.77% |
| INERT INGREDIENTS: | 58.50% |
| TOTAL | 100.00% |

Isomer Specific AOAC Method, Equivalent to:

| | |
|---|------------------------|
| * 2, 4-Dichlorophenoxyacetic Acid | 25.38%, 2.44 lbs./gal. |
| ** 2- (+)-R-2-(2-Methyl-4-Chlorophenoxy) propionic Acid | 6.75%, 0.63 lbs./gal. |
| *** 3, 6-Dichloro-o-anisic Acid | 2.30%, 0.22 lbs./gal. |

†CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

**FOR USE BY PROFESSIONAL TURF MAINTENANCE PERSONNEL, LANDSCAPING OR
COMMERCIAL APPLICATORS ONLY. NOT FOR SALE TO OR USE BY HOMEOWNERS.**

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

**Si usted no entiende la etiqueta, busque a alguien para que
se la explique a usted en detalle.**

(If you do not understand the label, find someone to explain it to you in detail.)

**SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF
PRACTICAL TREATMENT**

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

NOV 16 2000
**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
14 774-2**

EPA REG. NO. 14774-2

EPA EST. NO. 228-IL-1

Manufactured For:
Agrilience, LLC

NET CONTENTS GALS.

P.O. Box 64089, St. Paul, MN 55164-0089

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

DANGER - PELIGRO

Corrosive, causes irreversible eye damage. Do not get in eyes, or on skin or clothing. Avoid inhalation of spray mists. Harmful if swallowed or inhaled. Remove saturated clothing as soon as possible and shower. If this container is over one gallon and less than five gallons, then persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

NON-WPS TURF USES: Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170)--in general only agricultural plant uses are covered by the WPS--must wear face shield, goggles, or safety glasses and long pants, long-sleeved shirt, socks, shoes and rubber gloves when mixing, loading or applying this product. It is recommended that safety glasses include front, brow, and temple protection. In addition to the clothing and eye protection listed above, commercial mixer/loaders must wear chemical resistant in place of rubber gloves except when the product is to be applied to a golf course. After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

NON-WPS INDUSTRIAL USES: When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear face shield, goggles, or safety glasses and chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow, and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required. Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry.

WPS USES: Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170)--in general, agricultural plant uses are covered--must wear: coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, chemical resistant headgear for overhead exposure and chemical-resistant apron when cleaning equipment, mixing or loading. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing of PPE must not be reused until it has been cleaned. If this container is over one gallon and less than five gallons, mixers and loaders who do not use a mechanical system (such as a probe and pump or spigot) to transfer contents of this container must wear coveralls or a chemical resistant apron in addition to the other required PPE.

Engineering Controls Statements: If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

USERS SHOULD: Wash hands, face, and arms with soap and water before eating, smoking, drinking, or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

STATEMENT OF PRACTICAL TREATMENT

- IF IN EYES:** Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention at once.
- IF SWALLOWED:** Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.
- IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.
- IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and 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 apply when weather conditions favor drift from target area. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other spraying. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not contaminate water when disposing of equipment washwaters. Do not apply this product through any type of irrigation system. Do not contaminate domestic or irrigation waters.

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 herbicides 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 groundwater 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.**

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: Coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. For Turf use, 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 spray has dried.

STRIKE 3 is for use on lawns, turf, sod farms*, golf courses (fairways, aprons, tees and roughs), parks, cemeteries, highways, rights-of-way and similar non-crop areas.

*Not for use on sod farms in Arizona.

USE PRECAUTIONS

Avoid mist to vegetables, flowers, ornamentals, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Do not spray on carpetgrass, dichondra nor on lawns or turf where desirable clovers are present. Avoid fine mists. Except as noted, use only lawn-type sprayers. Coarse sprays are less likely to "wind-drift". Use coarse spray droplets. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other species. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90°F. Avoid applying during excessively dry or hot periods unless irrigation is used. For optimum results: (1) turf should not be mowed for 1 to 2 days before and after application; (2) do not apply if rainfall is expected within 48 hours; nor should lawns be irrigated (watered) for 48 hours following application. Reseed no sooner than three to four weeks after application of this product. Failure to observe all precautions may result in injury to turf and/or susceptible plants.

STRIKE 3 can be mixed with some liquid fertilizers or liquid iron materials. Because liquid fertilizer and liquid iron differ in pH, free ammonia content, density, salt concentration and percentage of water, a compatibility test is recommended prior to mixing in application equipment. All regulations, either State or Federal, relating to the application of liquid fertilizers or liquid iron and this product must be strictly followed.

WEEDS CONTROLLED

Bedstraw
Black medic
Buckhorn
Burdock
Chicory
Chickweed
Clover
Dandelion
Dock
Ground ivy
Healall

Henbit
Knotweed
Lambsquarter
Lespedeza
Mallow
Morningglory
Peppergrass
Pigweed
Plantain
Poison ivy
Poison oak
and other broadleaf weeds.

Purslane
Ragweed
Sheep sorrel
Shepherdspurse
Speedwell
Spurge
Wild carrot
Wild garlic
Wild lettuce
Wild onion
Yarrow

ORNAMENTAL LAWNS & TURFS

APPLICATIONS:

Cool Season Grasses -

RATES:

Such as Bluegrass, Fescue, and Ryegrass - Use this product at the rate of 3 to 4 pints per acre (1.1 to 1.5 fl. oz. per 1,000 square feet).

For Normal Application - Use 40 to 80 gallons of water per acre. (1 to 2 gallons of water per 1,000 square feet).

For Professional Lawn Maintenance - Use 1 to 5 gallons of water per 1,000 square feet. Higher water volumes may be used when tank-mixed with a turf fertilizer. Follow fertilizer labels for proper amounts to add.

Warm Season Grasses -

St. Augustine, Bahia, common Bermuda, Centipede, and Zoysia grasses - Apply STRIKE 3 at a maximum rate of 2 to 2-1/2 pints in 40 to 200 gallons of water per acre. Use reduced rates if grass is stressed from heat or drought. Exercise care when applying during growth stages from dormancy to green-up and from green-up to dormancy. Some temporary discoloration may occur on warm season grasses.

NOTE: If Bermudagrass is dormant, up to 4 pints per acre may be used. However, some hybrid Bermuda grasses may be sensitive to this product. Contact your local extension service weed control specialist.

Bentgrass -

On closely mowed bentgrass (putting and bowling greens) - Apply this product at a maximum rate of one fluid ounce in 5 gallons of water per 1,500 square feet - preferably in May or mid-August through September. Slight turf yellowing will disappear after about one week.

NOTE

Care should be taken to avoid overdosing Bentgrass, St. Augustine, and Centipede grasses or injury may result. Large volumes of spray water (i.e. one fluid ounce in 5 gallons of water per 1,500 square feet) will aid in obtaining uniform coverage. If hand-type sprayers are used, it is preferable to use a single nozzle sprayer rather than a multiple nozzle boom as sideways application with a boom where the spray from more than one nozzle is allowed to fall on the same area will result in heavy local over-application and subsequent turf discoloration or injury.

**Herbi™ Controlled
5 Droplet Applicator:**

For cool season grasses - Add 2 to 3 pints of STRIKE 3 to the Herbi pint container. Fill balance of container with water. Keeping container agitated, spray entire contents over 33,000 square feet (approx. 3/4 acre). Do not overlap spray patterns.

For listed warm season grasses - Add 1.5 to 2 pints of STRIKE 3 to the Herbi 5 pint container and fill balance of container with water. Follow Herbi spray instructions for cool season grasses. Use reduced rates if grass is stressed from heat, drought, etc.

**Other Controlled
Droplet Applicators:
(CDA), Atomizers, and
Spinning Disk
Applicators:**

For cool season grasses - Use STRIKE 3 at the rate of 3 to 4 pints per acre (1.1 to 1.5 fl. oz. per 1,000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment). Do not overlap spray patterns.

For listed warm season grasses - Use 2 to 2-1/2 pints of STRIKE 3 per acre (.75 to .9 fl. oz. per 1,000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment); and follow CDA spray instructions for cool season grasses. Use reduced rates if grass is stressed from heat, drought, etc.

**Lower Volume
Equipment:**

Use as little as 5 gallons of water per acre. Use only application equipment that is capable of spreading a uniform droplet, wetting each weed surface.

Herbi™ is a trademark of North American Micron.

NON-TURF AREAS

Roadsides (including aprons and guardrails) rights-of-way, and other similar non-crop areas: For control of broadleaf weeds, mix at a rate of 1/3 to 1-gallon of STRIKE 3 per 50 to 300 gallons of water. This mixture will cover 43,500 square feet. Thoroughly saturate all weeds with spray mixture. Apply any time between the time when plants come into full leaf (Spring) to when the plants begin to go dormant. Best results are obtained when weeds are young and actively growing. Do not cut weeds until herbicide has translocated throughout the plant causing root death. For small broadleaf weeds, use the lower rate. Heavy, dense stands require the higher rate with high water volume. For small (spot) applications with small tank sprayers, apply at the rate of 4 ounces of STRIKE 3 per gallon of water and spray to thoroughly wet all foliage.

For control of woody plants, apply to both stems and foliage any time from the time foliage is completely matured until the time plants start to go dormant. All leaves, stems and suckers must be completely wet to the ground line for effective control. Regrowth may be anticipated on the more resistant species. Add 1 to 1-1/2 gallons of STRIKE 3 to 100 gallons of water applying 200 to 600 gallons of spray mixture per 43,500 square feet depending upon the height and thickness of the brush. Mix thoroughly before spraying.

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Store at temperatures above 32°F . If allowed to freeze, remix before using. This does not alter this product. Containers should be opened in well ventilated areas. Keep container tightly sealed when not in use. Do not stack cardboard cases more than two pallets high. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. If container is damaged or if pesticide has leaked, contain all spillage. Absorb and clean up all spilled material with granules or sand. Place in a closed, labeled container for proper disposal. 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such use.