

Riverdale

C H E M I C A L C O M P A N Y

OFFICE: 425 WEST 194th STREET, GLENWOOD, IL 60425-1584

PLANT: 220 EAST 17th STREET, CHICAGO HEIGHTS, IL 60411-3699

April 30, 1993

Ms. Joanne I. Miller
Product Manager (23)
Registration Division - H7505C
U.S. Environmental Protection Agency
Crystal Mall Bldg. #2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Miller:

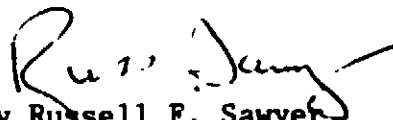
Subject: 2,4-D Exposure Reduction Program Label Revisions Due 3/1/93
Label Corrections

Following the submission of approximately sixty (60) labels, we conducted an audit and found, for more reasons than we care to go in to, it became necessary to correct the majority of the labels previously submitted.

We have made two copies of each corrected label. We respectfully request that they be entered in to our registration file as replacements. We apologize for any inconvenience this may cause the Agency.

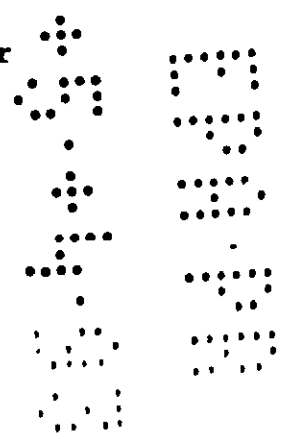
Sincerely yours,

RIVERDALE CHEMICAL COMPANY


By Russell F. Sawyer
Regulatory Affairs Manager

RFS:ls

Enc.



RIVERDALE

2,4-D L.V. 2 ESTER

A SELECTIVE WEED KILLER

ACTIVE INGREDIENT:

Isooctyl (2-ethylhexyl) Ester of 2,4-Dichlorophenoxyacetic Acid* 38.0%

INERT INGREDIENTS: 62.0%

TOTAL 100.0%

Isomer Specific AOAC Method No. 6.321, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid 25.2%, 1.92 lbs./gal.

KEEP OUT OF REACH OF CHILDREN

CAUTION - CAUCION

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

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS GAL.

EPA REG. NO. 228-71

EPA EST. NO. 228-IL-1

MANUFACTURED BY

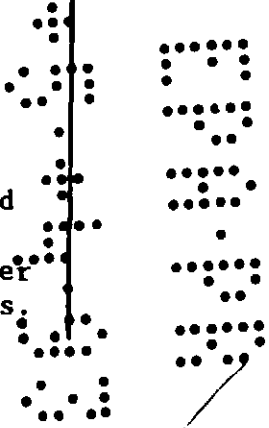
RIVERDALE CHEMICAL COMPANY

GLENWOOD, IL 60425-1584

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

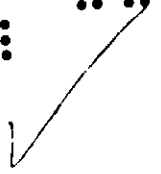
CAUTION - CAUCION

Harmful if swallowed or inhaled. Avoid contact with skin, eyes and clothing. Avoid inhalation of vapors or spray mists. Remove saturated clothing as soon as possible and shower. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.



NOTE: Spanish Language is optional.

Revised A/O 1/14/93 Corr.



If this container is over one gallons 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, then a mechanical system (probe and pump) 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.

Please see additional Precautionary Statements in Directions For Use instructions.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention immediately. Do not induce vomiting or give anything by mouth to an unconscious person. This product contains petroleum distillates.

IF ON SKIN: Wash skin with plenty of soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush eyes with water for 15 minutes and get medical attention.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not apply directly to flowers, fruits, vegetables, grapes, ornamentals, cotton or other desirable plants. Do not apply when weather conditions favor drift from target area. (Coarse sprays are less likely to drift.) Vapors from this product may injure susceptible plants in the immediate vicinity. Clean and rinse spray equipment using soap or detergent and water or suitable chemical cleaner, and rinse thoroughly before reuse for other spraying. It is best to use a separate sprayer for application of insecticides and fungicides. 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. Excessive amounts of this product in the soil may temporarily inhibit seed germination and plant growth.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D 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 mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

When using on Pastures and Rangeland Grasses there is a (1) 7 day pre-grazing interval for dairy cattle; (2) 30 day pre-harvest interval for grass cut for hay; and (3) 3 day pre-slaughter interval for meat animals.

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.**

RE-ENTRY STATEMENT

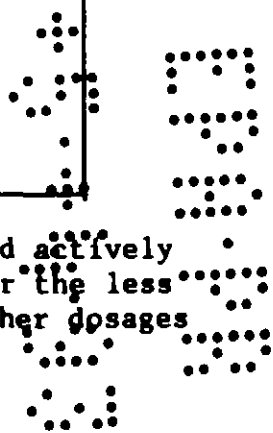
Do not enter treated areas without protective clothing until sprays have dried. Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Warnings should state "Do not enter treated areas unless wearing chemical resistant full body clothing including NIOSH approved respirator, goggles, and gloves until sprays have dried:." When oral warnings are given, warnings shall be given in language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: **CAUTION: Area treated with 2,4-D Low Volatile Ester on date of application.** Do not enter without appropriate protective clothing until sprays have dried. In case of accidental exposure follow precautionary statements on label.

ADDITIONAL PRECAUTIONARY STATEMENTS FOR AGRICULTURAL CROP USES (Including Sod Farms and Forestry workers engaged in the commercial production of wood fiber or timber products including forestry site preparation)

When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), 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 applications in an enclosed cockpit and applicators applying this product from a tractor that has been 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. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. 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. The rates of applications for pastures and rangelands are per acre per application per site. Do not enter or allow worker entry into treated areas during restricted-entry interval of 12 hours. There isn't any reentry restrictions for non-crop uses of pastures, rangelands and forests.

General Directions - All broadleaf plants do not respond the same. Young and actively growing weeds are easier to kill and the lower dosages may be used here. For the less sensitive species and under conditions where kill is more difficult, the higher dosages should be used.



5-17

Use 2,4-D L.V. 2 Ester for control of the following weeds:

Bitterweed, Broomweed, Croton weed, Dandelion, Docks, Dogfennel, Fanweed, Kochia, Lambsquarters, Mallow, Marshelder, Mustards, Peppergrass, Pigweed, Plantains, Ragweed, Shepherdspurse, Tarweed, Thistles, Vetch Wild carrot, Wild garlic, Wild morningglory, Wild onion, Wild radish, many other broadleaved weeds; Alder, Buckbrush, Coastal sage, Elderberry, Hazel, Sand sagebrush, Sand shinnery oak, Sumac, Willow, and certain other woody perennials.

Mixing Directions - When used on crops at the higher rates recommended 2,4-D L.V. 2 Ester may cause some injury to crop plants, especially if crop is growing rapidly. However, where weeds are a serious problem, weed control will often offset crop damage. Do not overdose or use on crops not recommended on this label. In preparing the mixture add half the required water to the tank. Begin agitation and add 2,4-D L.V. 2 Ester and then the rest of water.

Weeds in Corn - Post-Emergence: Use 3/4 pint 2,4-D L.V. 2 Ester in the amount of water necessary to cover 1 acre. If weeds are sensitive, dosage can be reduced to 1/2 pint while more resistant weeds may require dosage of 1 pint. Apply spray as soon as majority of weeds have germinated. Drop nozzles should be used after corn is 10 inches tall in order to keep spray off corn leaves. Do not apply from tasseling to dough stage. **Pre-Emergence Application:** Use 2 to 4 quarts 2,4-D L.V. 2 Ester in 10-20 gallons water per acre. Apply after planting anytime, but before corn emerges. Do not treat light sandy soils.

Weeds in Spring Wheat and Barley - Use 1 pint 2,4-D L.V. 2 Ester in necessary water to spray one acre. Make spray application when grain is in full tiller stage (6 to 8 in. tall) until the early boot stage. Injury can occur if sprays are applied to young seedling or when grain is in the boot or shot blade stage. Dosages may be increased 1/2 pint for more resistant weeds or decreased 1/2 pint for easy to kill weeds.

Weeds in Winter Wheat and Rye - Use 1 to 1-1/2 pints 2,4-D L.V. 2 Ester in necessary water to spray one acre. Make application in the spring from the fully tillered to the jointing stages.

Weeds in Oats Not Underseeded with Legumes - Do not use over 1 pint 2,4-D L.V. 2 Ester in necessary water to cover one acre. Since recommendations vary in states as to proper time of application, follow local state recommendations as to timing of spray.

Weeds in Pasture - To control most broadleaf weeds use 1-1/2 to 2 quarts 2,4-D L.V. 2 Ester in sufficient water to cover one acre. Apply when weeds are growing best. For the control of wild garlic and wild onion increase dosage to 4-6 quarts per acre. Make three applications in Fall-Spring-Fall or Spring-Fall-Spring sequence. Do not apply to creeping grasses or freshly seeded pastures. Most legumes are also damaged or killed.

ADDITIONAL PRECAUTIONARY STATEMENTS FOR TURF CONTROL

When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection. Commercial mixers/loaders must also wear these clothes, except when the product is to be applied to golf courses. After using the product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin

6-7

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 spray has dried.

Weeds in Turf - To control most broadleaf weeds use 1-1/2 to 2 quarts 2,4-D L.V. 2 Ester in sufficient water to cover one acre. Apply when weeds are growing best. For the control of wild garlic and wild onion increase dosage to 4-6 quarts per acre. Make three applications in Fall-Spring-Fall or Spring-Fall-Spring sequence. Do not apply to creeping grasses or freshly seeded lawns.

ADDITIONAL PRECAUTIONARY STATEMENTS FOR BRUSH CONTROL

The maximum application rate for forestry site preparation is 1 gallon 6 ounces per acre per application per site. There isn't any restrictions on the annual maximum number of applications for brush control. No reentry restriction for non-agricultural uses.

Roadside and General Weed Control - Use 2 to 3 quarts 2,4-D L.V. 2 Ester in 100 gallons of water. Apply as a wetting spray covering all foliage thoroughly. This application is recommended along roads, rights-of-way, fence rows, drainage ditchbanks, and in pole yards and similar non-crop areas.

Woody Plant Control - For 2,4-D susceptible brush like willow, elderberry, sumac, apply a drenching spray using 3 quarts 2,4-D L.V. 2 Ester in 50 gallons water. Wet thoroughly, including foliage, bark, shoot stems down to ground level. This use should be confined to non-crop areas described under directions for Roadside and General Weed Control.

Knapsack Applications - For spot treatment of weeds mix one cupful 2,4-D L.V. 2 Ester in 3 gallons of water and wet all foliage thoroughly to run off stage.

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. Containers should be opened in well ventilated areas. Do not contaminate water, food or feed by storage or disposal. Keep container tightly sealed when not in use. Do not stack cardboard cases more than two pallets high.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixtures, or rinsate is a violation of Federal law and may contaminate groundwater. 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. 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.