



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

DEC 2 2003

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Russell F. Sawyer  
Nufarm Americas Inc.  
1333 Burr Ridge Parkway, Suite 125A  
Burr Ridge, IL 60527-0866

Dear Mr. Sawyer:

Subject: Revised Labeling  
Riverdale Sodium Salt of 2,4-D  
EPA Registration Number 228-123 ✓  
Your Submission Dated October 29, 2003

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:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- Move the Storage and Disposal section to the beginning or the end of the Directions for Use section.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391. Please note that the incorrect Application for Registration [EPA Form 8570-1] was submitted with the application which delayed our response. The form was for EPA Reg. No. 228-136 instead of this product, EPA Reg. No. 228-123.

Sincerely yours,

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Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505C)

Enclosure

RIVERDALE®

SODIUM SALT OF 2,4-D

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

DEC 2 2003

228-123

ACTIVE INGREDIENT:	Monohydrate Sodium Salt of 2,4-Dichlorophenoxyacetic Acid*	90.6%
INERT INGREDIENTS:		9.4%
	TOTAL	100.0%

Isomer Specific by AOAC Method, Equivalent to:  
 \*2,4-Dichlorophenoxyacetic Acid . . . . . 76.8%

Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

**FOR MANUFACTURE OF HERBICIDES ONLY**

**KEEP OUT OF REACH OF CHILDREN ● CAUTION**

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

Harmful if swallowed. Do not inhale dust. Avoid contact with skin, eyes and clothing.

**FIRST AID STATEMENT**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

- IF IN EYES:** 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.
- IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
- IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
- IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Revised 4/22/03 Maximum use rates for Forestry and Non-Crop sites via Amendment.  
 10/29/03 Changed First Aid Statement per PR 2001-1, company name and added the "implementation paragraph" per the Agency's 7/23/03 letter via Amendment.

This pesticide may be used only for the formulation of a herbicide. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

1. **TERRESTRIAL NONFOOD CROPS**

- |                                    |                  |
|------------------------------------|------------------|
| Ornamental trees, shrubs and vines | Recreation areas |
| Lawn and turf grasses              | Industrial sites |
| Uncultivated agricultural areas    | Paved areas      |
| Uncultivated nonagricultural areas | Outdoor areas    |
| General soil treatment             |                  |

2. Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.\*

3. Uses for experimental purposes that are in compliance with U.S. EPA requirements.\*

\*NOTICE: Riverdale Chemical Company makes no warranties, guarantees or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to these uses of 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.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf uses after June 15, 1994, must contain the revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below. All products released for shipment on or after October 1, 2005 must bear revised labeling complying with the maximum application rates for general non-crop sites; tree, brush and woody plant control on rights-of-way; and forestry use patterns other than site preparation, if registered for such uses.

**GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING**

1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron.
2. Containers of 5 gallons or more in capacity must also bear the following statement: "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."

**SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING**

1. **FOR AGRICULTURAL USES**

- a. Clothing Requirement Statements: "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 applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."
- b. Personal Hygiene Statements: "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. Remove saturated clothing as soon as possible and shower."

- c. The maximum application rate to pasture and rangeland is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per acre per application per site.
- d. The maximum application rate to forestry site preparation is the lower of 1) existing application rate on currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application per site. The maximum application rate to all forestry sites is the lower of 1) existing application rate on currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application site.
- e. A reentry interval is required and should be in accordance with the Worker Protection Standards, 40 CFR Parts 156 and 170.

## 2. FOR INDUSTRIAL/AQUATIC USES

- a. Clothing Requirement Statements: "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 applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."
- b. Personal Hygiene Statements: "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 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. Remove saturated clothing as soon as possible and shower."
- c. The maximum application rate to general non-crop sites is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per acre per application site. The maximum non-crop application rate for tree, brush and woody plant control on rights-of-way is the lower of 1) existing application rate on currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application site. The maximum seasonal application rate to non-crop sites is 4 pounds 2,4-D acid equivalent per acre per application site.

## 3. FOR RESIDENTIAL AND TURF USES

- a. Clothing Requirement Statements: 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."; 2) For homeowners and other non-commercial users of liquid 2,4-D products, and for commercial mixer/loader/applicators of liquid 2,4-D products when the product is to be applied to a golf course: a) For Amine Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves."; b) For Amine Liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."; c) For Acid, Sodium Salt and Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; d) For Acid, Sodium Salt and Ester Liquid Products carrying "WARNING" or "DANGER" signal word: "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." 3) Commercial mixer/loader/applicators of liquid 2,4-D products, except when the product is to be applied to a golf course: a) For products carrying "CAUTION" signal word: "When mixing, loading or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; b) for products carrying "WARNING" or "DANGER" signal word: "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."

protection."

- b. Personal Hygiene Statements: 1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."; 2) For All Liquid

**STORAGE AND DISPOSAL**

**STORAGE:** Always use original container to store pesticides in a cool dry secured warehouse or storage building. Containers should be opened in well ventilated areas. Keep container tightly sealed when not in use. Do not store near open containers of fertilizer, seed or other pesticides. Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. If container is damaged or if pesticide has leaked clean up all spilled material. Place in closed labeled container. Improper disposal of excess pesticide, spray mixture, 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:** Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulating equipment. Then dispose of bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Products: "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. Remove saturated clothing as soon as possible and shower.

- c. The maximum application rate to turf is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per application per site. The maximum number of broadcast applications per treatment site is 2 per year.
- d. The following reentry statement must be included: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled."

**NOTICE:** Seller makes no warranty expressed or implied concerning the use of this product other than indicated on this label. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

(RV 102903)

**NET WEIGHT LBS.**

**EPA REG. NO. 228-123**

**EPA EST. NO. 228-IL-1**

**MANUFACTURED BY NUFARM AMERICAS INC., BURR RIDGE, ILLINOIS 60527-0866**