



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

August 12, 2003

Russell Sawyer
Nufarm Americas Inc.
D/B/A Riverdale - A Nufarm Company
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527-0866

Dear Mr. Sawyer:

Subject: Label split, First Aid Revisions Per PR Notice 2001-1, Response to PR 2001-6, Non-notification changes
Riverdale Killsall Liquid
Registration Number: 228-133
Your Submission Dated: 07/10/03

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended is acceptable, provided you make the following changes before you release the product for shipment.

RESIDENTIAL LABEL

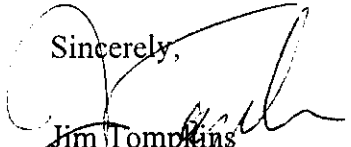
1. The order of the First Aid statements and the order of the Hazards to Humans and Domestic Animals statements should correspond, with the most severe routes of exposure listed first. Change the order of the First Aid statements to "If Swallowed, If on Skin or Clothing, If in Eyes."
2. In the Storage and Disposal section, add "Pesticide" in front of "Storage" and add "Container" in front of "Disposal."
3. Also in the Storage and Disposal section, remove the phrase "If this product cannot be used as directed or offered to others for their use" from the "If partially filled" information. Change the sentence to "If partially filled - Call your local solid waste agency or 1-800-CLEANUP for disposal instructions."
4. Because sodium chlorate is very flammable, all pesticide products containing sodium chlorate must include a fire retardant in the formulation. On the label in the vicinity of the ingredient statement, verbiage indicating that this product contains a fire retardant must be added.

COMMERCIAL LABEL

1. Because sodium chlorate is an oxidizer, all pesticide products containing sodium chlorate must include a fire retardant in the formulation. On the label in the vicinity of the ingredient statement, verbiage indicating that the product contains a fire retardant must be added.
2. Modify the CSF to indicate the presence of the fire retardant.

Submit three (3) copies of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted labels. A stamped copy of labeling is enclosed for your records.

Sincerely,



Jim Tompkins
Product Manager, Team 25
Herbicide Branch
Registration Division

Enclosure

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(Commercial Label)

RIVERDALE®

KILLSALL™ LIQUID

A WEED AND GRASS KILLER

MAKES SOIL BARREN

ACCEPTED
with COMMENTS
in EPA Letter Dated
AUG 12 2003

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

228-133

ACTIVE INGREDIENT:

Sodium Chlorate (NaClO ₃) *	18.5%
INERT INGREDIENTS:	81.5%
TOTAL	100.0%

*Equivalent to 2.0 lbs. of active ingredient per gallon.

Riverdale is a Registered Trademark and Killsall is a Trademark of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

**SEE SIDE PANEL FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS**

NET CONTENTS GALS.

EPA REG. NO. 228-133

EPA EST. NO. 228-IL-1

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

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

Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash all exposed skin areas, clothing and equipment with soap and water after application. Do not leave containers where children or animals may take the chemical internally.

FIRST AID STATEMENT

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

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 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.

ENVIRONMENTAL HAZARD

This product is toxic to fish and wildlife. 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 allow solution or spray drift to contact desirable plants. Do not allow on or near turf, valuable trees or other plants, or in areas into which their roots may extend or on slopes where "run-off" will move the chemical into root areas of useful plants. Do not contaminate water intended for irrigation and domestic use. Do not contaminate water by cleaning of equipment or disposal of wastes.

Do not apply in any manner not specified on label. Do not mix with other chemical or weed killers.

This product should be used only where unproductive soil is not objectionable.

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 USE ON LAWNS

RIVERDALE KILLSALL™ LIQUID is a weed and grass killer for general use to prevent vegetation growth on driveways, parking lots, walks, around fences, curbs and similar non-crop areas where plant growth is not desired.

Mix 1 quart of Riverdale Killsall Liquid in 2 gallons of water and spray unwanted plants thoroughly. This amount of spray mix will cover 150 square feet of area. For complete weed and grass control where perennial weeds are a problem, mix 1 quart in 2 gallons of water for treatment of 100 square feet of area.

Spray thoroughly to wet plants using a coarse spray to prevent drifting. Best results are obtained when weeds and grass are small. Fall application may be made. Some retreatment may be necessary the following Spring for complete removal of all vegetation.

1 Quart Controls	150 sq. ft.
2 Quarts Control	300 sq. ft.
1 Gallon Controls	600 sq. ft.
5 Gallons Control	3000 sq. ft.

Avoid application in hot, dry weather, since the killing action of Riverdale Killsall Liquid is through both the roots and the tops of plants, and therefore moisture is necessary after application to take the chemical into the soil to kill deep-rooted perennials. Fall application should be made in areas of 20 inches or less rainfall. Since some of the chemical is apt to be lost by leaching, retreatment may be necessary to keep areas free of undesirable plant growth. By preventing weed growth early, you are decreasing the ever-present fire hazard that can become dangerous due to dead and dry vegetation.

Annual and Perennial Weeds: To control annuals and knock down top growth of perennials, use 1 quart of Riverdale Killsall Liquid in 2 gallons of water and spray unwanted plants thoroughly.

Perennial Weeds and Grasses: Use 1 quart per 100 sq. ft. and apply in a sufficient amount of water in order to facilitate uniform coverage. For control of weeds with creeping root stalks, treat all soil to within 6 ft. of visible vegetation in order to destroy the spreading roots.

STORAGE AND DISPOSAL

STORAGE: Always store pesticides in a secured warehouse or storage building. 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. 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. 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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.

WARRANTY

Seller warrants that this material 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 and Buyer assumes the risk of any use contrary to such directions. SELLER MAKES NO OTHER EXPRESSED OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESSED OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO EXCEPT IN WRITING WITH A SPECIFIC REFERENCE TO THIS WARRANTY. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made. (RV 071003)

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(Residential Label)

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STORAGE AND DISPOSAL

STORAGE: To be stored in original container and placed in areas inaccessible to children.

DISPOSAL: **If empty** - Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled** - If product cannot be used as directed, or offered to others for their use, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

NOTICE: Buyer assumes all responsibility for safety and use not in strict accordance with directions. (RV 071003)