



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

NOV 8 1991

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Russell F. Sawyer
Riverdale Chemical Company
425 West 194th Street
Glenwood, Illinois 60425

Subject: Reconsideration of Serious Error for Riverdale MCPA-4
Amine EPA Reg. No. 228-143

Dear Mr. Sawyer

This letter is to communicate to you a decision on your request that the Agency reconsider its determination that a serious error exists in Riverdale's WPS submission for Riverdale MCPA-4 Amine, EPA Reg. No. 228-143.

The Agency believes that Riverdale had a re-entry statement "Do not enter treated areas without protective clothing until sprays have dried" on the previous label which should have been carried over to the "Non-Agricultural Use Box". Riverdale believes that this re-entry statement was only associated with the agricultural crops on the label and should not have been carried over to the Non-Agricultural Use Box.

The Product Manger has also reviewed your WPS submission for Riverdale MCPA-4 Amine and your request that the Agency reconsider its determination that a serious error exists in Riverdale's WPS submission. Based on this review, the Agency has reached the following conclusions:

The statement "No re-entry restriction for non-crop applications" must be deleted from the Non-Agricultural Use Requirements box on your label.

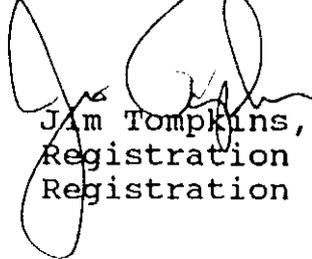
The statement "Do not enter treated areas without protective clothing until sprays have dried" must be added to the Non-Agricultural Use Requirements box on your label.



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Based on the information in your request for reconsideration of the serious error determination, I am withdrawing my determination that the WPS submission for Riverdale MCPA-4 Amine, EPA Reg. No. 228-143 contains a "serious error". A replacement "Accepted with Comments" letter to replace the Agency's March 11, 1994 letter is enclosed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Tompkins", written over the typed name.

Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)



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Mr. Russel F. Sawyer
Riverdale Chemical Company
425 West 194th Street
Glenwood, IL 60425

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 09/03/93 in Response to PR Notice 93-7
EPA Reg. No. 228-143
RIVERDALE MCPA-4 AMINE

Dear Registrant:

This letter replaces the letter sent to you on March 11, 1994. The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. Another copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.



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WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.

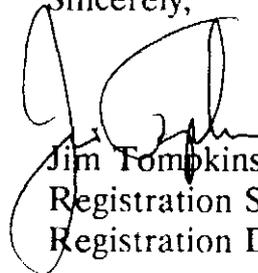
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

Russell Sawyer
Riverdale Chemical Company.

Comments for: EPA REG. NO. 228-143
RIVERDALE MCPA-4 AMINE

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Add the following User Safety Recommendation to the label:
"wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet."

Place the heading "Personal Protective Equipment" on your labeling in the location shown in Section A on part I of the Product Worksheet in Supplement three-A to PR Notice 93-7.

Delete the crossed out statements on your proposed label. They are redundant statements or phrases.

Delete the statement "No re-entry restriction for non-crop applications" from the Non-Agricultural Use Requirements box on your label. Add the statement "Do not enter treated areas without protective clothing until sprays have dried" to the Non-Agricultural Use Requirements box on your label.

RIVERDALE

MCPA-4 AMINE

For Selective Postemergent Control of Many Broadleaf Weeds
In Wheat, Oats, Barley, Rye, Rice, Peas, Flax,
Established Grasslands and Non-Crop Areas.

ACTIVE INGREDIENT:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid* 48.

INERT INGREDIENTS: 51.

TOTAL 100.

Isomer Specific AOAC Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid 39.67%, 3.7 lbs./gal

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

EPA REG. NO. 228-143

NET CONTENTS

GAL.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

ACCEPTED
with COMMENTS
In EPA Letter Dated

RIVERDALE CHEMICAL COMPANY

MAR 11 1994

GLENWOOD, ILLINOIS 60425-1584

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

(Inside Booklet)

228-143

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER - PELIGRO

Corrosive, causes irreversible eye damage. Do not get in eyes, on skin, or clothing.
Avoid inhalation of spray mists. Harmful if swallowed. Wash thoroughly with soap and
water after handling. *Labels - add U.S. etc.*

have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPA pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and 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 manner inconsistent with its label. 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, waterproof gloves, shoes plus socks, and protective eyewear.

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. No re-entry restrictions for non-crop applications.

GENERAL INFORMATION

MCPA is effective on a large number of broadleaf weeds and is useful for controlling these weeds in certain crops. Several crops, such as flax, rice, oats, and small grains underseeded to legumes, are more tolerant of MCPA than they are of 2,4-D. Crop varieties vary in response to MCPA, and some may be easily injured. Apply this product

weed problem against the possibility of crop damage. Where perennial weeds are scattered, spot treatment is suggested to minimize the effect of crop injury.

WEED CONTROL IN ESTABLISHED ALFALFA AND RED CLOVER: For control of yellow rocket and other susceptible annual weeds such as pennycress or fanweed, use 1 pint per acre of MCPA-4 Amine. Apply in late Fall following frosts when the legumes are dormant. The temperature at the time of spraying should be above 40°F.

CANNING PEAS: Use MCPA-4 Amine at 1/4 to 3/4 pint per acre, apply in at least 2 to 10 gallons of total spray for aerial application and 5 to 30 gallons of water for ground equipment. Apply to peas after the 3 node stage and before the first pea flowering, use when peas are 4 to 6 inches tall. Do not apply during bloom period of crop. To control Canada thistle, use 1/2 to 3/4 pint per acre. Peas may be injured somewhat at the higher rate of application, but if thistle growth is heavy, control will more than compensate for injury to peas. Do not spray peas that are stressed from lack of moisture or when temperatures are over 90°F. Do not graze treated fields or feed treated vines to livestock.

RICE IN CALIFORNIA: For early season broadleaf weed and sedge control in rice, apply 1 to 1-1/2 pints of MCPA-4 Amine herbicide per acre by air in 3 to 10 gallons of total spray volume when rice is in the 3 to 4 leaf stage, and with well established root systems, usually 18 to 24 days after planting. Applications made during hot weather or at the higher dosage range may cause temporary stunting of the rice. For maximum effectiveness the weeds should be exposed at time of treatment. If retreatment is necessary, usually 35 to 65 days after planting, the total amount per acre of MCPA-4 Amine applied in the two applications must not exceed 3 pints in one season.

RICE In Other Areas: For the control of certain broadleaf weeds and sedges, 7 to 10 weeks after planting apply 2 to 3 pints of MCPA-4 Amine in 10 to 30 gallons of water per acre for ground equipment and at least 2 to 5 gallons of water per acre for aerial application. Use the higher rate where sedges or bulrushes are the major problem, use the lower rate for control of arrowhead, water plantain, and redstem. Treat when rice is fully tillered and 6 to 8 inches above water, usually 35 to 65 days after planting. Do not treat when rice is in the early seedling, boot or early heading stages, or when air temperature is over 90°F. Some rice varieties may be less tolerant to MCPA than others. Consult your Agricultural Experiment Station or Extension Service Weed Specialists for appropriate rates and timing of MCPA spray and on tolerance of rice varieties.

FLAX - Use 1/4 to 1/2 pint of Riverdale MCPA-4 Amine in 5 to 20 gallons of water per acre by ground equipment and at least 2 to 5 gallons of water per acre by air. Apply only when weeds are up and when flax is 2 to 8 inches high and before it comes into bud stage. Treatment after early bud stage may result in severe damage. If Canada thistle is present it may be necessary to go as high as 3/4 pint per acre to prevent seed head production. Some injury to the flax may result.

RANGE AND TIMBER LANDS: For control of Whitebrush - Use 1-1/4 quarts and sufficient water to make 8 gallons of solution per acre. Apply in Spring or Fall under good moisture conditions, full leaf, before blossoms begin to fall.

GRASSES:

Established Lawns, Golf Courses and Similar Turf Grasses - Use 1 to 3 pints per acre in 10 to 120 gallons of water to give thorough coverage. Use higher rate for white top and Canada thistle. On smaller areas use 1 fluid ounce (4 tablespoonfuls) mixed in 1 to 3 gallons of water and apply uniformly over 1,000 square feet. Do not exceed specified application rates for any area. Avoid applying during excessively dry or hot periods unless irrigation

If burned, stay out of smoke.

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station weed specialists for specific recommendations for local weed problems and for information on possible lower dosages.

WARRANTY: Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risk of use, storage or handling of this material not in strict accordance with directions given herewith. (PR933&7 042194)