

MAY 13 1998

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

Dear Mr. Sawyer:

Subject: Amended Labeling and Formulation;
 Revise Isooctyl Ester of MCP P to MCP P Acid
 Riverdale 25-3-3 Weed and Feed
 EPA Registration No. 228-152
 Your Submissions Dated April 10, 1997 Through January 28, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) Add a statement to the beginning of the Precautionary Statements to read "Causes moderate eye irritation."
- 2) Revise the third sentence of the Environmental Hazards section of the commercial version of the labeling to read "Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark."

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for both the commercial and non-commercial versions of the referenced label, incorporating the above changes, before releasing the product for shipment.

DK:305-7546: HB/PM23

CONCURRENCES

SYMBOL	7505C							
SURNAME	D. KENNY							
DATE	5/12/98							

The Agency has also reviewed your submission for the revised Confidential Statement of Formula dated April 11, 1997 for the basic formulation. It has been determined that the Confidential Statement of Formula agrees with the label claim in compliance with PR Notice 91-2 and is acceptable. The Confidential Statement of Formula has been added to your file as part of the record. It is understood that this formulation supersedes any and all other formulations previously approved for this product.

Sincerely yours,

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

Enclosure

(Back Panel)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid inhalation of dust and contact with eyes, skin, or clothing. Wear long pants, long-sleeved shirt, socks, shoes, and gloves when loading and applying this product. After using this product remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin 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 dust has settled.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention.
IF IN EYES: Flush eyes with water for 15 minutes. Get medical attention.
IF ON SKIN: Wash skin with soap and water.

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. Do not contaminate water when disposing of equipment washwaters, nor pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

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 phenoxy 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 a manner inconsistent with its labeling. **READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENT AND DIRECTIONS.**

This product may be used on Bluegrass, Fescue, Rye, Common Bermuda, Bahia, and Zoysia lawns. **DO NOT USE** on Dichondra, Carpet and St. Augustine grasses. **DO NOT USE** this product where desirable clovers are present or allow the product to "wind drift" on flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth in lawns and control many broadleaf weeds such as: Blue lettuce, Buckhorn, Burdock, Chickweed, Chicory, Cinquefoil, Clover, Cocklebur, Croton, Dandelion, Dock, Fanweed, Galinsoga, Goldenrod, Ground ivy, Hawkweed, Healall, Henbit, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarters, Mallow, Morningglory, Mustard, Nettles, Oxalis, Pennywort, Peppergrass, Pigweed, Plantain, Povertyweed, Purslane, Ragweed, Shepherdspurge, Smartweed, Speedwell, Spotted spurge, Thistle, Yarrow, Vetch, Wild aster, Wild lettuce, Wild radish, and Yarrow.

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Apply when grass is moist (after a rain, sprinkling or dew). For most effective broadleaf weed killing action, avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material. Do not apply if rainfall is expected within 48 hours following treatment. Avoid contact with desirable shrubs, plants, vegetables, or flowers. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. Do not cut grass 1 to 2 days before and after application.

HOW TO APPLY: This 20 (or 18) pound bag should be used on 5000 square feet. Apply evenly

with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is equal to one application.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds (3.6 pounds for 18# bag) per 1000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 1 pound (.9 lb. for 18# bag) per 250 square feet. Clean spreader thoroughly after use.

SPREADER SETTINGS

For One Pass Application*

<u>MAKE</u>	<u>SETTINGS</u>	<u>MAKE</u>	<u>SETTINGS</u>
Cyclone	5-1/4 - 5-3/4	Montgomery Wards	
Scotts 35	5-1/2	1091, 1093, 1095	6-3/4
Scotts C-1	J - L	Montgomery Wards	
Central	7 - 8	1080, 1081	5
K-Mart	7 - 8	Precision	6

Sweep all fertilizer materials from concrete surfaces immediately after application. Do not wash material from concrete surfaces because fertilizers which contain iron may cause discoloration upon oxidation.

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. Do not stack more than two pallets high. 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. 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay away from smoke.

OPTIONAL GUARANTEE: Seller Policy - 100% satisfaction guaranteed. If for any reason you are not satisfied with the results after using this premium product, you are entitled to get your money back. Simply bring proof of purchase to any seller location.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.
(ERP 061594) (PR938 042194/RV 041097)

The following note will not be part of the actual label copy.

*NOTE: Guaranteed (fertilizer) analysis and spreader settings will vary among various commercial fertilizer manufacturers.

(Non-Commercial Label)

678

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAY 13 1998

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

228-152

RIVERDALE

WEED AND FEED
FERTILIZER PLUS 2,4-D & MCPP

FOR ORNAMENTAL TURF

Treats (or covers) 5,000 Square Feet (50' x 100')

This product is a remarkably effective lawn fertilizer which combines both fast and long-lasting feed action, plus effective weed control. This product produces a thick, green turf while killing weeds to make way for new turf growth.

Riverdale Weed and Feed is designed for the control of dandelion, clover, and many other broadleaf weeds. Weeds contacted by this product gradually die and disappear from the lawn.

See back panel for a list of weeds controlled by Riverdale Weed and feed.

ACTIVE INGREDIENTS:

Isocetyl (2-ethylhexyl) Ester of 2,4-Dichlorophenoxyacetic Acid*	0.87%
2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.59%
INERT INGREDIENTS:	98.54%
TOTAL	100.00%

ISOMER SPECIFIC AOAC METHOD, EQUIVALENT TO:

*2,4-Dichlorophenoxyacetic Acid	0.57%
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GUARANTEED ANALYSIS:

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash (K ₂ O)	X%

Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.

Chlorine (Cl) Maximum	X%
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The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT

NET WEIGHT LBS.

EPA REG. NO. 228-152

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

(Back Panel)

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Sweep all fertilizer materials from concrete surfaces immediately after application. Do not wash material from concrete surfaces because fertilizers which contain iron may cause discoloration upon oxidation.

STORAGE AND DISPOSAL

STORAGE: Store in original container and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near other feed or foodstuffs. To prevent cross-contamination, do not store near other fertilizers, or near herbicides, insecticides, fungicides or seeds.

PRODUCT DISPOSAL: To dispose of bag which contains unused product, securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse empty bag. Fold empty bag and discard in trash.

OPTIONAL GUARANTEE: Seller Policy - 100% satisfaction guaranteed. If for any reason you are not satisfied with the results after using this premium product, you are entitled to get your money back. Simply bring proof of purchase to any seller location.

NOTICE: Seller makes no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

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