23 228-163 5/13/98 UNITED STATES ENVIRONMENTAL PROTECTION AGENC

MAY 1 3 1998

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

Dear Mr. Sawyer:

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Subject: Amended Labeling and Formulation; Revise Isooctyl Ester of MCPP to MCPP Acid Riverdale Premium Weed and Feed EPA Registration No. 228-163 Your Submissions Dated April 15, 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: 32	5-7546:	HB/PM	2.3 CONCL	TRENCES		 	
SYNBOL +	7505C						
SURNAME >	D. KENNY				1		
DATE -	5/13/98						

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

The Agency has also reviewed your submission for the revised Confidential Statement of Formula dated April 15, 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) 2 9 10

Enclosure

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· RIVERDALE

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PREMIUM WEED & FEED $\mathbf{X} = \mathbf{X} = \mathbf{X}$

MAY 1 3 1998

ACCEPTED with COMMENTS In EPA Letter Dated

Under the Federal Insecticide, Fundicide, and Rodenticide Act as smended, for the pesticide registered ander EPA Reg. No. $2 \cdot 2 \cdot 8 - 163$

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FOR LAWNS AND ORNAMENTAL TURF TREATS (OR COVERS) 5,000 SQ. FT. (50' x 100')

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

Riverdale Premium Weed & 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 & Feed.

ACTIVE INGREDIENTS: Isooctyl (2-ethylhexyl) Ester of 2,4-Dichlorophenoxyacetic Acid* 2-(2-Methyl-4-Chlorophenoxy)propionic Acid INERT INGREDIENTS: TOTAL 100.00%
Isomer Specific AOAC, Equivalent to: *2,4-Dichlorophenoxyacetic Acid
Total Nitrogen (N)
Soluble Potash (K ₂ O)
Chlorine (Cl) Maximum

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

Fertilizer guaranteed by (Name of fertilizer registrant)

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

NET WEIGHT - 15 LBS.

EPA REG NO. 228-163

EPA EST. NO. APR 2 MANUFACTURED BY RIVERDALE CHEMICAL COMPANY P1:4 GLENWOOD, ILLINOIS 60425-1584

Revised 4/15/97 Changed MCPP IOE to MCPP Acid

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(Back Panel)

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid inhalation of dust and contact with eyes, skin, or clothing. Wear long pants, longsleeved 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 non-target 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 STATEMENTS AND DIRECTIONS.

This product-may be used on Bluegrass, Fescue, Rye, common Bermuda, Bahia and Zoysia lawns. Do not use on dichondra, carpetgrass and St. Augustine grasses. Do not use this product where desirable clovers are present or allow the product to "wind drift" on flowers, vegetables or ornamental shrubbery. When using a spinner type (rotary) spreader, use extreme caution to avoid any contact with desirable plants.

This product may be used for control of broadleaf weeds such as: Bindweed, Black medic, Blue lettuce, Buckhorn, Burdock, Chickweed, Chicory, Cinquefoil, Clover, Cocklebur, Croton, Dandelion, Dock, Fanweed, Galinsoga, Goldenrod, Ground ivy, Hawkweed, Healall, Henbit, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarter, Mallow, Morningglory, Mustard, Nettle, Oxalis, Pennywort, Peppergrass, Pigweed, Plantain, Povertyweed, Purslane, Ragweed, Shepherdspurse, Smartweed, Speedwell, Spotted spurge, Thistle, Vervain, 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. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. 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. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain, sprinkling or dew); (3) Avoid unnecessary disturbances, including water of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. 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.

Riverdale Premium Weed & Feed (Commercial)

HOW TO APPLY: This 15 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 <u>approximate</u> for applying contents of this package at a suggested rate of 3.0 pounds per 1,000 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 a rate of 0.75 lb. per 250 square feet.

SPREADER SETTINGS° For One Pass Application

MAKE	SETTING	MAKE	SETTING
Cyclone	3-1/2	Central	5
Scotts Drop	4	K-Mart	5
Scotts Rotary	Е	Jackson Drop	5
Show-N-Tell		Jet Spray	3-1/2
Sears Drop	5	Sears Rotary	3

Sweep (do not wash) all fertilizer materials from surfaces immediately after application because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

(The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 lb. nitrogen/1,000 square feet; otherwise, this information is optional.)

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing *(No. of lbs.) pounds of nitrogen per 1,000 square feet (optional P_2O_5 and K_2O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program. *Based on Inert fertilizer claimed.

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 vixtures or rinsate is a violation of Federal law and may contaminate groundwater. If chese 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.

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 041597)

OPTIONAL SPREADER INSTRUCTIONS:

- (Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.
- (Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

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OPTIONAL MARKETING STATEMENTS

Environmental **Benefits** (Grasscycling Logo)

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.

- A 50° x 50° lawn produces enough oxygen for a family of 4 every day
- ✓ Reduces Glare & Reduces Noise
- ✓ Traps Dust, Smoke Particles & other Pollutants
- Purifies Water & Modifies Temperature
- Improves Soil Condition & Controls Erosion

Formulated for your area: Nitrogen to help promote green thick lawns. Includes slow release nitrogen for extended lawn feeding; Phosphoric Acid to help provide strong, vigorous roots; and, Potash to help increase resistance to disease and drought.

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. Chlorine declaration and fertilizer guarantor are optional except where mandated by State fertilizer regulation.

(Non-Commercial Label)

RIVERDALE

PREMIUM WEED & FEED X - X - X

MAY 1 3 1998 Under the Federal Insecticide, Fundicide, and Rodenticide Act as smeanded, for the pesticide registered under EPA Reg. No. 228-163

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EPA EST. NO.

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ACCEPTED /

with COMMENTS In EPA Letter Dated

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INERT INGREDIENTS:	
Isomer Specific AOAC, Equivalent to: *2,4-Dichlorophenoxyacetic Acid	š
GUARANTEED ANALYSIS:° Total Nitrogen (N) X% Ammoniacal Nitrogen X% Urea Nitrogen	2
Available Phosphate (P_2O_5)	90 96
Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, and Muriate of Potash	
Chlorine (Cl) Maximum	

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

Fertilizer guaranteed by (Name of fertilizer registrant)

KEEP OUT OF REACH OF CHILDREN

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

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EPA REG NO. 228-163

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

Revised 4/15/97 Changed MCPP IOE to MCPP Acid

Riverdale Premium Weed & Feed (Non-Commercial)

(Back Panel)

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STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near feed or foodstuffs. To prevent cross-contamination, do not store near other fertiizers, 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.

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 041597)

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OPTIONAL MARKETING STATEMENTS

(Grassevelina

Logo)

Environmental

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