

PM 23

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
228-191 2/3/99

1 of 6

FEB 3 1999

Russell F. Sawyer
Riverdale Chemical Company
425 West 194th St.
Glenwood, IL 60411-3699

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p
Riverdale^{2D} + 2 MCPP-p Turf Herbicide
EPA Registration Number: 228-191
Your Submission Dated October 29, 1998

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement(s) of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement(s) of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statements of Formula (Basic Formulation and (2) Alternate Formulations, dated 10/29/98) have been placed in the Agency's file for the subject product. These CSF's supersedes all previously submitted CSFs for this product.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	DMorgan							
DATE ▶	Feb 3, 1999							

A stamped copy of the labeling is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

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

Enclosure

RIVERDALE

2 D + 2 MCPP-p AMINE
TURF HERBICIDE

A SELECTIVE HERBICIDE TO CONTROL BROADLEAF WEEDS

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	24.5%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	12.1%
INERT INGREDIENTS:	63.4%
TOTAL	100.0%

Isomer specific Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	20.4%, 1.88 lbs./gal.
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid,	10.0%, 0.92 lbs./gal.

† CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.

THE OPTICAL ADVANTAGE™ - a Trademark of Riverdale Chemical Company

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.

SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

EPA REG. NO. 228-191

NET CONTENTS GALS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

NOTE: Spanish language is optional

ACCEPTED
with COMMENTS
In EPA Letter Dated

FEB 3 1999

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

228-191

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER - PELIGRO**

Corrosive, may cause irreversible eye damage. Do not get in eyes, or on skin or clothing. Harmful if swallowed or inhaled. Avoid inhalation of spray mists. Wear face shield or goggles, long pants, long-sleeved shirt, socks, shoes and chemical resistant gloves when mixing, loading or applying this product. After using this product, rinse 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. 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 spray has dried.

If this container is over one gallon and less than five gallons, then persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. If this container is five gallons or more in capacity, 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.

Please see additional Precautionary Statements in Directions For Use Instructions.

STATEMENT OF PRACTICAL TREATMENT

- IF IN EYES:** Immediately flush eyes with plenty of water for 15 minutes and get medical attention at once.
- IF SWALLOWED:** Drink one or two glasses of water. Induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention immediately.
- IF ON SKIN:** Wash promptly with soap and water and rinse thoroughly.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates or nontarget plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. When cleaning equipment, do not pour washwaters on the ground; spray or drain over a large area away from wells and other water sources. Do not contaminate water when disposing of equipment washwaters. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPP-p and 2,4-D 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.

GENERAL INFORMATION

2D + 2 MCPP-p Amine is a post-emergence herbicide especially formulated for use on turfgrass for selective control of many broadleaf weeds commonly growing in lawns without injury to desirable grasses. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

This product may be used on such types of turf as Merion, Kentucky bluegrass, Bermudagrass, fescues and rye grasses. Apply in Spring or Fall when weeds are actively growing.

USE PRECAUTIONS

CARE MUST BE TAKEN TO AVOID DRIFT OR SPRAY MISTS TO NON-TARGET susceptible plants such as cotton, vegetables, flowers, ornamentals, shrubs, trees, and other desirable plants. Do not spray near these plants. Do not spray on buffalo, carpetgrass, dichondra, St. Augustine, nor on grasses where desirable clovers are present. This product has been used successfully on bentgrass; however, it should not be used unless prior tests have shown it to be non-damaging under the particular conditions of use. To eradicate broadleaf weeds, it is better to use another selective herbicide for fine lawn grasses. Use a lawn type sprayer with coarse spray as wind drift is less likely. Avoid fine mists. Do not spray exposed roots of desirable plants. Use the higher rate for hard-to-kill weeds. Do not exceed specified application dosages for any area. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90°F. Avoid applying during excessively dry or hot periods unless irrigation is used. For optimum results, (1) turf should not be mowed 1 to 2 days before and following application; (2) Do not apply if rainfall is expected within 48 hours; nor should lawns be irrigated (watered) for 48 hours following application. Reseed no sooner than 3 to 4 weeks after application of this product.

WEEDS CONTROLLED BY 2D + 2 MCPP-p AMINE

The following is a partial list of weeds controlled:

Buckhorn	Lambsquarters	Red clover
Clover	Mallow	*Red sorrel
Common chickweed	Mouseear chickweed	Stitchwort
Curley dock	Morningglory	*Speedwell
*Dandelion	Pigweed	White clover
*English daisy	Plantain	*Wild garlic
Ground ivy	Purslane	*Wild onion
Knotweed	Ragweed	Yarrow

Use high rate on chart for weeds marked with an asterisk () in the above list.

Knotweed is controlled more easily in Spring or early Summer when weeds are young.

NOTE: MCPP-p acts more slowly than 2,4-D so that some weeds will be controlled before others. Allow 3 to 4 weeks for complete weed control action to occur.

Amount to Apply	Per 1,000 Square Feet	Per Acre
Low rate	2 fluid ounces	2 to 2-1/2 quarts
High rate	2-1/2 fluid ounces	3 quarts

PREPARATION OF THE SPRAY: This product must be mixed with water prior to use. For best results use 2 to 4 gallons of water per 1,000 sq. ft. for smaller areas; 20 to 40 gallons of water per acre for larger areas. Apply by means of a sprayer to give uniform coverage. Repeat applications may be necessary especially with heavy infestations of the less susceptible weeds indicated with an asterisk in above list. 2 days before or after application, it is wise to properly fertilize the lawn so as to encourage the lawn to heal as rapidly as possible, filling in the bare areas where the weeds have died away. Once the weeds have been removed, the bare areas should be reseeded.

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. 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 area. Keep container tightly sealed when not in use. Do not stack cardboard cases 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, contain all spillage. Absorb and clean up all spilled material with granules or sand. Place in a closed labeled container for proper disposal. Improper disposal of excess pesticide, spray mixtures, or rinsate is a violation of Federal law and may contaminate ground water. 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: 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. Plastic containers are also disposable by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Riverdale warrants that this herbicide conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this herbicide is reasonably fit for its intended purposes. Since timing, method of application, weather, plant and soil conditions, mixtures with other chemicals, and factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use.

(ERP 061594) (PR938&11 042194/RV 102998)