

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

Dear Mr. Sawyer:

SUBJECT: Label Amendment
Riverdale MCPP-4 Amine
EPA Registration No. 228-192
Your Submission Dated April 27, 1995, Requesting a
Stamped Label Consolidating Recent Label Changes
(Protective Clothing Requirements and Removal of
the Product from the Scope of the WPS).

The proposed amendments to the registration of the subject pesticide product have been reviewed and found to be acceptable under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, provided that you:

- ° submit one (1) copy of the final printed label before releasing the product for shipment.

A stamped copy of the label is enclosed for your records.

The submitted toxicology studies for the subject product indicate that it is in Toxicity category I for eye irritation; category III for acute oral, dermal and inhalation toxicity; and Toxicity category IV for skin irritation. The submitted studies, which had been graded CORE supplementary pending submission of properly executed Quality Assurance Statements (see Agency correspondence dated December 7, 1993), have been reevaluated and determined to be acceptable. Accordingly, the precautionary labeling should be revised to be consistent with the above acute toxicity profile. Please make the following changes to the Precautionary Statements at the next printing of the label:

1. Revise the first paragraph under "Hazards to Humans and Domestic Animals" to read as follows:

RD:STANTON:PM Team 23:Rm. 235:305-5218:Disk #1:S486784.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jun 22, 1995							

"Corrosive. Causes irreversible eye damage. Harmful if swallowed, absorbed through skin, or inhaled. Do not get in eyes or on clothing. Wear face shield or goggles when mixing, loading or applying this product. Avoid contact with skin. Avoid breathing spray mist or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."

- 2. Move the ocular statement of practical treatment to the beginning of the section. It should appear first, since this is the exposure route of greatest concern.
- 3. Revise the oral statement of practical treatment to read as follows, since the product is corrosive:

"IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."

- 4. Add the following sentence at the end of the dermal statement of practical treatment: "Get medical attention."
- 5. Add the following inhalation statement of practical treatment:

"IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

Sincerely yours,

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

Enclosure

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RIVERDALE

MCPP-4 AMINE

FOR USE ON LAWNS, GOLF COURSES AND ORNAMENTAL TURF

ACTIVE INGREDIENT:

Dimethylamine Salt of 2-(2-Methyl-4-Chlorophenoxy)propionic Acid* 51.9%

INERT INGREDIENTS: 48.1%

TOTAL 100.0%

By Isomer Specific Assay Method, Equivalent to:

*2-(2-Methyl-4-Chlorophenoxy)propionic Acid 42.9%, 3.97 lbs.

ONLY FOR SALE TO, USE AND STORAGE BY, LAWN CARE AND LANDSCAPING PERSONNEL
OR COMMERCIAL APPLICATORS

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 SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS GALS.

EPA REG. NO. 228-192

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

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-192

(Side Panels)

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

Corrosive. May cause irreversible eye damage. Harmful if swallowed. Avoid inhaling vapor or spray mist. Do not get in eyes or on clothing. Avoid contact with skin, may cause skin irritation. Wear face shield or goggles when mixing, loading or applying this product. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT

- IF SWALLOWED:** Induce vomiting immediately by giving two glasses of water and sticking finger down throat. Never give anything by mouth to an unconscious person. Seek medical attention.
- IF IN EYES:** Hold eyelids open and flush with a steady stream of water for 15 minutes. Seek medical attention.
- IF ON SKIN:** Wash exposed skin gently with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect 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. Do not contaminate water when disposing of equipment washwaters nor pour washwaters on ground; spray or drain over a large area away from wells and other water sources. Do not apply this product through any type of irrigation system. Use care to avoid spray contact or drift to susceptible plants such as beans and other legumes, cotton, flowers, grapes, ornamentals, vegetables and other plants. Do not permit spray mist containing MCPP-4 Amine to drift onto them since even very small quantities of the spray, which may not be visible, can cause severe injury during both growing and dormant periods. Do not spray when the wind is blowing towards susceptible crops or ornamental plants. Use coarse sprays to minimize drift. Spray drift can be lessened by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by using no more than 20 pounds spraying pressure with flat fan or flooding flat fan nozzle tips; by spraying when wind velocity is low; and by stopping all spraying when wind exceeds 8 miles per hour. Do not apply with hollow cone-type insecticides or other nozzles that produce a fine droplet spray. Do not use the spray equipment for applying other materials to susceptible crops as injury may result.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPP 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

MCPP-4 Amine may be used on ornamental turf grasses with greater safety than 2,4-D. 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 herbicide is safe to use on Washington, Toronto and Seaside bentgrasses, Kentucky and Merion bluegrasses. Apply MCPP-4 Amine on a warm calm day when weeds are growing vigorously. Use any suitable sprayer or watering can with fine nose to give a uniform cover of the weeds. Although this herbicide is relatively slow in action, it gives a superior result on more difficult to control weeds such as:

MORE SUSCEPTIBLE WEEDS

Controlled by 2-1/2 pints MCPP-4 Amine per acre.

Bindweed	Dandelion	Pigweed
Buttercup	Ground Ivy	Plantain
Cinquefoil	Lambsquarters	Ragweed
Clover	Mouseear chickweed	Spotted spurge
Common chickweed		Thistle

LESS SUSCEPTIBLE WEEDS

Controlled by 4 pints MCPP-4 Amine per acre. Repeat applications at half the recommended dosage may give better control

Black medic	Knotweed	Purslane
Dock	Morningglory	Speedwell
Henbit	Pennywort	Yarrow

PREPARATION OF THE SPRAY: Fill half the spray tank with water; then add the required amount of MCPP-4 Amine. Mix thoroughly, adding the remainder of water during the operation.

Rate of Use	Per 1,000 sq. ft.	Per Acre
Established greens:	1 fluid oz. in 2-1/2 gallons of water	2-1/2 pints in 20-40 gallons of water
Established lawns, golf fairways:	1-1/2 fluid oz. in 2-1/2 gallons of water	4 pints

TIME OF APPLICATION: To obtain the best results MCPP-4 Amine must be applied when the weeds are most susceptible and conditions are such that no damage to the grasses will occur. Apply MCPP-4 Amine when the weeds are growing vigorously. During periods of drought, weeds become more resistant to herbicides. Under the same conditions, fine grasses are more susceptible to MCPP-4 Amine, particularly when temperatures exceed 90°F. This chemical is absorbed by the foliage of broadleaf weeds and is translocated throughout the whole plant to roots, etc. where it eventually causes death of the plant. Do not cut or mow the lawn 2 to 3 days before or after treatment so that maximum uptake and translocation can occur. Do not spray if rain is likely, otherwise the chemical may be washed off before absorption has taken place. For the same reason, do not water the lawn for at least 24 hours after application.

Better control of the weeds classified as Less Susceptible Weeds may be obtained with repeat applications of half the recommended dose carried out at not less than monthly intervals.

MCPP-4 Amine is not recommended for St. Augustine grass and Centipedegrass, as it can cause damage to these species. Do not use MCPP-4 Amine on newly sown lawns or turf until grasses are well established. Reseed no sooner than three to four weeks after application of this product. Avoid drift onto other plants and do not use the first cuttings after treatment as a mulch for flowers and vegetables.

STORAGE AND DISPOSAL

STORAGE: Always 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 areas. Keep containers tightly sealed when not in use. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 mixture, or rinsate is a viola

tion of Federal law. 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.

NOTE: Local conditions, crop varieties and application regulations vary and may affect use of this herbicide. Consult local Agricultural Experiment Station or Extension Service weed specialist and State regulatory agencies for recommendations in your area.

WARRANTY AND LIMITATION OF DAMAGES

Riverdale Chemical Company 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 direction. Seller makes no other express 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 claim is made.

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