

PM 23 228-199

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

MAR 14 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Russell F. Sawyer
RIVERDALE CHEMICAL CO.
425 WEST 194TH ST.
GLENWOOD, IL 60425

Subject: Label Amendment Submission of 09/03/93 in Response to PR Notice 93-7
EPA Reg. No. 228-199
RIVERDALE SODIUM SALT OF MCPA

Dear Registrant:

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.

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.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

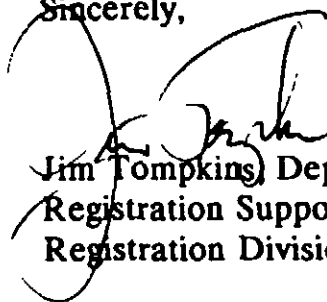
Submit the final printed labeling via the U.S. Postal Service to:

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Russell F Sawyer
RIVERDALE CHEMICAL CO
425 WEST 194TH ST.
GLENWOOD IL 60425

Comment for: EPA Reg Nr.228-199
RIVERDALE SODIUM SALT OF MCPA

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

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.

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet."

RIVERDALE

SODIUM SALT OF MCPA

To Control Certain Weeds in Small Grains, Rice, Peas, Seed Flax,
Grassland and Pastures, Lawns and Turf, Grasses Grown
for Seed and Non-Crop Areas

ACTIVE INGREDIENT:

Sodium Salt of 2-methyl-4-chlorophenoxyacetic Acid* 22.25%

INERT INGREDIENTS: 77.75%

TOTAL 100.00%

Isomer Specific by AOAC Method

*2-methyl-4-chlorophenoxyacetic acid equivalent 20.05%, 1.86 lbs/gal.

For Use By Professional Turf Maintenance Personnel,
Landscaping or Commercial Applicators Only

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 Side Panel For Additional Precautionary Statements
and Statement of Practical Treatment

NET CONTENTS

EPA REG. NO. 228-199

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY
GLENWOOD, ILLINOIS 60425-1584

(Side Panels)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Harmful if swallowed or absorbed through the skin. Do not inhale spray mist.

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 14 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-199

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Causes eye damage and skin irritation. Do not get in eyes. Do not allow contact with skin or clothing.

NON-WPS USES: Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170)-- in general, only agricultural plant uses are covered by the WPS -- must wear: eye protection.

WPS USES: Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural plant uses are covered -- must wear: long-sleeved shirt, long pants, waterproof gloves, shoes plus socks, and protective eyewear. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

USERS SHOULD: Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

STATEMENT OF PRACTICAL TREATMENT

- If Swallowed: Induce vomiting immediately by giving two glasses of water and stick finger down throat. Never give anything by mouth to an unconscious person. Seek medical attention.
- If In Eyes: Flush eyes with plenty of water for at least 15 minutes and 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. For terrestrial uses, 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 washwater on the ground; spray or drain over a large area away from wells and other water sources. 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 use this product with amine salts of 2,4-D. Do not permit spray mist containing this product to drift onto them, since even 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. Do not apply MCPA Sodium Salt with nozzles that produce a fine spray. Use coarse sprays to minimize drift. With ground equipment, 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 6 to 7 miles per hour. Do not apply with hollow cone-type insecticide or other nozzles that produce a coarse spray pattern and by spraying only when the wind velocity is less than 5 miles per hour. Do not use the same spray equipment for applying other materials to susceptible crops as injury may result.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA 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 a manner inconsistent with its labeling. 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 worker 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

Sodium Salt of MCPA is a very slow acting systemic herbicide. This property allows the chemical to translocate into the root system before the tops are killed. Other chemicals do not control this slowly. This results in effective control without sterilizing the soil.

This product is recommended to control the following as well as many other noxious plants susceptible to MCPA.

SUSCEPTIBLE WEEDS

| | | |
|---------------|--------------------|----------------|
| Cocklebur | Mint | Shepherdspurse |
| Dragon head | Pepperweed (field) | Stinkweed |
| Goatsbeard | Puncturevine | Wild Radish |
| Kochia | Purslane | Wintercress |
| Lambsquarters | Ragweed | Yellow rocket |
| Marshelder | | |

LESS SUSCEPTIBLE WEEDS

| | | |
|----------------|-----------------------|---------------------------|
| Arrowhead | Pigweed | Sow thistle |
| Bulrush | Plantain | Stinging nettle |
| Burhead | Redstem | Sunflower |
| Buttercup | Russian pigweed | Vetch |
| Canada thistle | Russian thistle | Waterhyssop |
| Dandelion | Sedge | Waterplantain |
| Hempnettle | Silverleaf nightshade | Whitetop (Hoary cress) |

PREPARATION OF SPRAY: For aerial application use 5 to 10 gallons of water per acre. For ground application use a conventional low pressure, low volume sprayer that delivers 5 to 40 gallons of water per acre.

When diluting, the material must be mixed thoroughly before using. If the material is allowed to stand for any length of time after dilution, it should be stirred again before using.

SELECTIVE SPRAYING: (Wheat, Oats, Barley and Rye) Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to the boot stage. Use up to 3 pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage.

RICE: This product can be used to replace 2,4-D in the weed spraying programs. Follow state and local spraying regulations and recommendations. Observe the same precautions against drift onto cotton and other susceptible crops as for the 2,4-D spraying. Treated effluent waters may be harmful to fish and other aquatic life. Do not grow crayfish or catfish in treated rice fields. Apply 3 to 5 pints per acre in sufficient water (10 to 30 gallons) to give coverage. Use lower rate where arrowhead, waterplantain and redstem are the only weeds. Use the 5 pint rate where sedge and bulrush are also present. Make application only when weeds are present and where rice is well established, 6 to 8 inches above water; no sooner than 35 and no later than 65 days after seeding or when crop stems begin to elongate. Water should not be less than 2 to 3 inches deep at shallowest point. Do not spray after rice is in the boot stage, or when temperatures are over 90°F.

PEAS: Use 1/2 to 1-1/2 pints per acre when peas are 4 to 6 inches tall using 15 to 30 gallons of water per acre. Do not spray while peas are in blossom. Peas may show light injury but they usually recover a few days after treatment. Use the higher rate before buds form on Canada thistle to prevent from going to seed. Do not feed treated vines to livestock. Do not forage or graze treated pea fields. Do not spray peas that are stressed from lack of moisture or when temperatures are over 90°F.

SEED FLAX: Where 2 to 3 ounces of MCPA acid equivalent per acre is recommended for susceptible weeds, use 1/2 to 1 pint of this product per acre in at least 15 to 20 gallons of water. Apply when all weeds are up and flax has at least 3 to 4 leaves, or is 3 to 4 inches tall, and before flax comes into bud. Treatment after early bud stage may result in severe damage. For moderately resistant weeds, spot spraying with a heavier rate may be necessary. Use 1-1/4 to 1-1/2 pints per acre to prevent seed production by Canada thistle. Do not spray flax underseeded with legumes without first consulting local weed specialist.

SMALL GRAINS (Wheat, Barley, Rye, Oats) NOT underseeded with mixed legumes.

Broadleaf Weeds: Use 1 to 3 pints per acre in the Spring when grain is fully tillered and 8 to 10 inches tall. Do not spray when grain is in the boot to dough stage.

Emergency Treatment of perennial Broadleaf Weeds in Wheat: Use 6 pints per acre when weeds are approaching bud stage, but do not spray grain in the boot to dough stage. The 6 pint (1.5 pounds acid equivalent) per application of any MCPA product can produce injury to wheat. Balance the severity of your weed problem against the possibility of crop damage. Where perennial weeds are scattered, spot treatment is suggested to minimize the extent of crop injury. Treat in the spring when grain is fully tillered and 8 to 20 inches tall.

NOTE: For Small Grains, Flax and Sorghum application, do not forage or graze meat animals on treated areas within seven days of slaughter.

(Rear Panel)

ESTABLISHED GRASSLANDS & PASTURES: Use 2 to 6 pints per acre in sufficient water (10 to 100 gallons) to give thorough coverage. Use higher rate for whitetop, Canada thistle and other less easy-to-control weeds; spray perennials in early-bud to full bloom stage and reapply to regrowth in Fall. Spray other weeds in Spring or Fall when they are actively growing.

ESTABLISHED LAWNS AND TURF: Use 2 fluid ounces in 3 to 5 gallons of water; apply uniformly over 1,000 square feet. On larger areas use 2 to 6 pints per acre in 10 to 100 gallons of water. Apply Spring or Fall for best results. Do not mow within 2 days before or after application.

GRASSES GROWN FOR SEED: Use 2 to 4 pints per acre in sufficient water to give adequate coverage. Use higher rate where weed stands are heavy. In established grasses apply in Spring before head comes into boot and on seedling grass after grass is tillered.

NOTE: In weed control in grasses repeat treatment may be needed for less susceptible weeds. White clover and other legumes may be temporarily injured or controlled. In some areas, dichondra, bent, buffalo, carpet and St. Augustine grasses may also be injured by the treatment.

NON-CROP SPRAYING: (Canada thistle, Whitetop, Meadow buttercup, Field bindweed and Morningglory) For Spot treatment use 1/2 to 3 to 4 gallons of water, or 1-1/2 gallons of

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this product per acre in sufficient water to give coverage and spray to wet weeds thoroughly when in bud to early bloom and again in Fall regrowth.

NOTE: For Non-food Uses, do not forage or graze livestock on treated areas within seven days of treatment.

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.

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 temperature above 32°F. If allowed to freeze, warm to at least 40°F and remix before using. Freezing does not alter this product. Containers should be opened in well-ventilated areas. 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 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 mixtures, or rinsate is a violation 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. Plastic containers also disposable by incineration, or if allowed by State and Local authorities by burning. If burned, stay out of smoke.

WARRANTY

Seller 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 directions. Seller makes no other express or implied warranty, including any other express or implied warranty of Fitness or of Merchantability, and no agent of Seller is authorized to do so except in writing with 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 a claim is made.

(PR933&7 042194)