

228-199

6/23/2003

Jackelk



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**JUN 23 2003**

Russell F. Sawyer  
Nufarm Americas Inc.  
1333 Burr Ridge Parkway, Suite 125A  
Burr Ridge, IL 60527-0866

Dear Mr. Sawyer:

Subject: Label Revisions  
Riverdale Sodium Salt of MCPA  
EPA Registration Number 228-199  
Your Submission Dated May 15, 2003

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- In the Non-Agricultural Use Requirements box delete "No re-entry restrictions for non-crop applications." and replace statements similar to the following:

Keep children and pets out of the treated area until sprays have dried.  
Keep unprotected persons out of treated areas until sprays have dried.

Refer to the Label Review Manual at the following internet site:

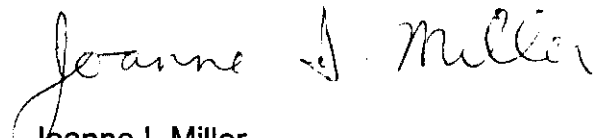
<http://www.epa.gov/oppfod01/labeling/lrm/chap-11.htm>

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

A handwritten signature in cursive script that reads "Joanne I. Miller". The signature is written in dark ink and is positioned above the typed name.

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

Enclosure

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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 AOAC Method, Equivalent to:

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

Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

Only For Sale To, Use and Storage By Agricultural 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.

(If you do not understand the label, find someone to  
explain it to you in detail.)

SEE SIDE PANEL FOR FIRST AID  
AND ADDITIONAL PRECAUTIONARY STATEMENTS

NET CONTENTS GALS.

EPA REG. NO. 228-199

EPA EST. NO. 228-IL-1

MANUFACTURED BY NUFARM AMERICAS, INC., BURR RIDGE, ILLINOIS 60527-0866

ACCEPTED  
with COMMENTS  
by EPA Letter Dated  
JUN 23 2003

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

228-199

(Side Panels)

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

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

**Personal Protective Equipment:** 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.

**Engineering Controls Statements:** 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:** Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing

**FIRST AID STATEMENT**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

**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 fine droplet spray. With aircraft application, drift can be lessened by applying not less than 5 gallons of spray per acre; by using no more than 20 pounds spray pressure at the nozzles; by using nozzles which 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.

**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 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. 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 store near open containers of fertilizer, seed or other pesticides. 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 are 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 expressed 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 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. (RV 051503)