

MAR 30 2005

CERTIFIED

Ms. Jeannie K. Smith
Nufarm Americas, Inc.
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60521-0866

Dear Ms. Smith:

SUBJECT: Applications For Reregistration
Dibro 1 Granular Weed Killer
EPA Registration No. 228-233

We reviewed the most current label, accepted on April 22, 2004, for compliance with the Bromacil RED. Further Revisions are required. Submit three (3) copies of revised labels within 21-days from the date of this letter. If you can't correct these deficiencies within the 21-day period, we will take appropriate action on this application. Submit revised draft labeling incorporating:

1. Revise the Hazards to Humans and Domestic Animals section to:

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation.
Avoid contact with eyes, skin, or clothing.

2. The text below should be added to the label of this occupational use product under "User Safety Requirements", "Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instruction for washables, use detergent and hot water. Keep and wash PPE separately from other laundry."

3. User Safety Recommendation statements should be added to the label, they should read:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

4. Revise the "For skin contact" first aid statement to "If on skin or clothing."
5. Revise the First Aid section to comply with PR Notice 2001-1.
6. Immediately below the First Aid statements add:

Have the product container or label with you when calling a poison control center or doctor or going for treatment, You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

7. Add a "Personal Protective Equipment" (PPE) section below the First Aid section. It should read; Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks and shoes
- Chemical resistant gloves. (Such as or made of any waterproof material)

8. Under the General Precautions and Restrictions section add:

"Not to be used in any recreational areas in or around homes."

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

9. Under Application Instructions add:

The maximum application rate is no more than 12 lb ai/A. The rate of 1 lb per 12 square feet currently specified on the draft label equals 18.1 lbs ai per acre and exceeds the allowable maximum application rate per acre.

10. Storage and Disposal section

The preferred location of the sentence "Do not contaminate water, food or feed by storage and disposal." is just under the storage and disposal heading.

Should you have any questions or concerns regarding this letter, please contact James Tompkins at (703) 305-5697.

Sincerely yours,

James Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505C)

RIVERDALE

4/5

DiBro 1

GRANULAR WEED KILLER

Contains Diuron and Bromacil

For Control of Weeds and Grasses in Non-Crop and Industrial Areas

ACTIVE INGREDIENTS:

Diuron [3-(3,4-dichlorophenyl)-1,1-dimethylurea] 0.5%

Bromacil (5-bromo-3-sec-butyl-6-methyluracil)* 0.5%

INERT INGREDIENTS: 99.0%
TOTAL 100.0%

*U.S. Pats 3,235,357 & 3,352,862

DiBro is a trademark of Riverdale Chemical Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE REAR PANEL FOR ADDITIONAL PRECAUTIONS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

May irritate eyes, nose, throat and skin. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Remove and wash contaminated clothing before reuse. Do not enter treated area until dust has settled.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.
IF ON SKIN: Wash with plenty of soap and water.

ENVIRONMENTAL HAZARDS

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.

NET WEIGHT LBS.

EPA REG. NO. 228-233

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAR 30 2005

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

Revised 10/1/97 Reregistration Response

228-233

is a violation of Federal law to use this product in a manner inconsistent with its labeling.

NON-CROP WEED CONTROL - INDUSTRIAL USE ONLY

Riverdale DiBro 1 Granular is a non-selective herbicide for controlling a wide range of annual and perennial weeds and grasses. It is recommended only for non-cropland areas such as railroad rights-of-way, and industrial areas. 800 to 1600 pound applications of Riverdale Di-Bro 1 Granular per acre usually results in a non-productive condition of the soil for a period of a year or more. The duration of non-productivity is dependent upon rainfall, soil type and other conditions.

Riverdale DiBro 1 Granular should be applied as furnished with a seed spreader, a fertilizer spreader, a shaker-type applicator, or with any equipment which will distribute the chemical uniformly over the area to be treated. For the control of annual and most perennial weeds and grasses, apply DiBro 1 Granular at the rate of 800 to 1600 pounds per acre; on smaller plots 0.5 to 1.0 pound per 12 to 30 square feet depending on weed growth. Repeat spot treatment may be required when deep-rooted perennial weeds are present. To obtain best results, DiBro 1 Granular should be applied to the ground where it will be absorbed by the roots. Application made early in the season have been found to give results superior to applications at a later seasonal date. DiBro 1 Granular may, however, be applied at any time of the year. Maximum effectiveness in arid regions is obtained when application is made just prior to the rainy season. Users should consult state agricultural experimental stations or extension service weed specialist for recommendations as to use in their particular area.

IMPORTANT: (NOT FOR RESIDENTIAL USE). Do not apply on or near valuable woody or herbaceous plants or on areas where their roots may extend because of possible injury to such plants. Thoroughly clean spreading equipment with a suitable chemical cleaner before using for other purposes (or do not use same spreading equipment for other purposes). Do not use on croplands or any land to be used for subsequent cropping. Keep animals off treated areas.

STORAGE AND DISPOSAL

STORAGE: Always store pesticides in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Open dumping is prohibited. Waste that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures. Place in a closed, labeled container for proper disposal.

CONTAINER DISPOSAL: Fiber Drum: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner and drum in a sanitary landfill or by incineration if allowed by state and local authorities. Fiber Canister: Do not reuse empty canister. Discard empty canister in trash.

NOTICE: Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. (PR938 042194/RV 100197)