

10/18/2004

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Russell F. Sawyer
Riverdale- A Nufarm Company
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527-0866

OCT 18 2004

Subject: Label Amendment
EPA Reg. No.: 228-235/DiBro 4 + 4

Dear Mr. Sawyer:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended has been compared with the dibrom reregistration requirements for this product, and the labeling is acceptable provided you make the following label changes.

1. Revisions are needed to the "First Aid" statements, add the following:
 - A. 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.
 - B. It is recommended that the following hotline information should be added to the label:
 - For additional information in case of emergency call toll free (Telephone #).
2. The "Hazards to Humans and Domestic Animals" statements must be modified to the following:
 - A. CAUTION
 - Harmful if swallowed.
 - Harmful if absorbed through the skin.
 - Causes moderate eye irritation.
 - Avoid contact with skin, eyes, or clothing.
3. A "PPE" statement must be added to the label including the following:
 - A. Personal Protective Equipment (PPE):
 - Applicators and other handlers must wear:
 - Long-sleeved shirt and long pants,
 - Socks and shoes, and
 - Chemical resistant gloves made of any waterproof material.

4. It is recommended that the following text be added to the label:
 - A. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

5. It is recommended that the following "User Safety Recommendations" text be added to the label:
 - A. User Safety Recommendations
 - Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
 - 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.
 - Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

6. Revisions are needed to the "Directions for Use" statements, including the following:
 - A. The following text must be added following the "Non-Crop Weed Control- Industrial Use Only" section and the "IMPORTANT: (Not for Residential Use)" section:
 - Application Restriction
 - 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.

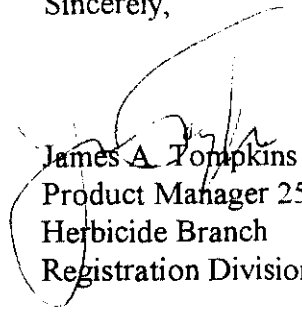
7. Because Aerial Application Is Prohibited, the "Spray Drift Management" section must be changed to "Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions." The "Importance of Droplet Size", "Controlling Droplet Size", "Swath Adjustment", "Wind", "Temperature and Humidity", and "Temperature Inversions" sections should all be removed from the label. The "Sensitive Areas" section should remain on the label.

8. The following text should be placed directly under the "Storage and Disposal" heading:
 - A. Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment.

9. Add "Pesticide" to the sub-heading "Storage" to read "Pesticide Storage".

Amended labeling will supercede all previous accepted ones. A stamped copy of labeling is enclosed for your records. Submit one (1) copy of final printed labeling before you release the product for shipment. If you have any questions please contact Erik Kraft at 703-308-9358.

Sincerely,



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

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RIVERDALE*

DiBro™ 4 + 4

Granular Weed Killer

CONTAINS DIURON & BROMACIL

FOR CONTROL OF WEEDS AND GRASSES IN NON-CROP AND INDUSTRIAL AREAS

ACTIVE INGREDIENTS:

Diuron [3-(3,4-dichlorophenyl)-1,1-dimethylurea]	4%
Bromacil (5-bromo-3-gac-butyl-6-methyluracil)*	4%
INERT INGREDIENTS:	92%
TOTAL	100%

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

DiBro is a Trademark of Riverdale - A Nufarm Company
Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE FOLLOWING FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS

NET WEIGHT LBS.

EPA REG. NO. 228-235

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 29 2004

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

228-235

EPA EST. NO. 228-IL-1

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.

OCT 18 2004

228-235

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

Revised 5/15/03 Changed First Aid per PR 2001-1 via Amendment.
A/O 7/31/03 Changed per EPA's letter dated 7/31/03.

(Back Panel)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling.

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 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

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.

DIRECTIONS FOR USE

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

Entry Restrictions: Do not enter or allow others to enter the treated area until dust has settled.

NON-CROP WEED CONTROL - INDUSTRIAL USE ONLY

DiBro 4 + 4 Granular is a non-selective granular herbicide for controlling a wide range of annual and perennial weeds and grasses. It is recommended only for non-cropland areas such as rights-of-way for pipeline, utility, highway, and railroad; and industrial areas such as airports, petroleum tank farms, lumberyards, and plant sites. 100 to 200 pound applications of DiBro 4 + 4 Granular per acre usually result in a non-productive condition of the soil for a period of a year or more. Do not apply more than 12 lbs. A.I. of Bromacil/Acre/Year (300 pounds of this product equals 12 lbs. A.I.). The duration of non-productivity is dependent upon rainfall, soil type, and other conditions.

DiBro 4 + 4 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 4 + 4 Granular at the rate of 100 to 200 pounds per acre; on smaller plots, 0.25 to 0.5 pound per 100 square feet. Repeat spot treatment may be required when deep-rooted perennial weeds are present. To obtain best results, DiBro 4 + 4 should be applied to the ground where it will be absorbed by the roots. Applications made early in the season have been found to give results superior to applications at a later seasonal date. DiBro 4 + 4 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 specialists for recommendations as to use in their particular area.

IMPORTANT: Not to be used in any recreational areas or in or around homes. 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. Aerial application is prohibited.

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SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions. The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees. Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversion section of this label).

Controlling Droplet Size

Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

Pressure - Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

Number of nozzles-Use the minimum number of nozzles that provide uniform coverage.

Nozzle Orientation - Orienting nozzles so that the spray is released backwards, parallel to the airstream will produce larger droplets than other orientations. Significant deflection from the horizontal will reduce droplet size and increase drift potential.

Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce larger droplets than other nozzle types.

Boom Length - For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

Application - Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment

When applications are made with a cross-wind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

Wind

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect drift.

Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry. 7/7

Temperature Inversions

Applications should not occur during a temperature inversion, because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun set and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a connected cloud (under low wind conditions) indicates an inversion, while smoke that moves upwards and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, nontarget crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

STORAGE AND DISPOSAL

STORAGE: Always store pesticides in a secured warehouse or storage building. Do not store near open containers of fertilizer, seed and other pesticides. Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment.

PESTICIDE DISPOSAL: Open dumping is prohibited. Waste or rinse water 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: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. The dispose of liner and drum in a sanitary landfill or by incineration if allowed by State and local authorities.

NOTICE OF WARRANTY

Seller warrants that this product conforms to the chemical description on the label there of and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of the seller. In no case shall the seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer. Seller makes no warranties of merchantability or fitness for a particular purpose nor any other expressed or implied warranty except as stated above.

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