

228-253

01-22-2004

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 22 2004

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

Dear Mr. Sawyer:

Subject: Revised Label
Riverdale MCPP-2 Amine
EPA Registration Number 228-253
Your Submission Dated December 18, 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:

a. On the Residential labeling delete the phrase, "or offered to others for their use," from the **if partly filled** disposal statement. This phrase is not related to disposal and is misleading to the user, therefore the product could be deemed to be misbranded with such a phrase.

b. Delete the phrase "greater safety than 2,4-D". 40 CFR 156.10(a)(5)(ix) prohibits safety claims on pesticide labeling. We would have no objection to a claim similar to the following if supported by data on file with your company:

MCPP-2 Amine used on ornamental turf lawns may result in less damage to treated grasses than a similar application of 2,4-D.

c. On the front panel delete "Get the Optical Advantage". This product does not contain the resolved isomer of MCPP.

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

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

If you have any questions concerning this letter, please contact me at 703-305-6224.

Sincerely yours,

Handwritten signature consisting of the letters 'J', 'S', and 'M' in a cursive style.

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

Enclosure

(Residential Label)

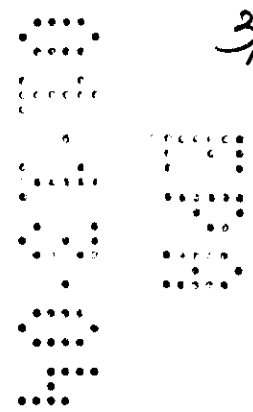
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RIVERDALE®

MCCPP-2 AMINE

For Control of Broadleaf Weeds on Residential Lawns

GET THE OPTICAL ADVANTAGE®



ACTIVE INGREDIENT:

Dimethylamine Salt of 2-(2-Methyl-4-Chlorophenoxy)propionic Acid* 25.96%

INERT INGREDIENTS: 74.04%

TOTAL 100.00%

By Isomer Specific Assay AOAC Method, Equivalent to:

*2-(2-Methyl-4-Chlorophenoxy)propionic Acid 21.45%, 1.9 lbs./gal.

Riverdale and The Optical Advantage are Registered Trademarks of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION - CAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

SEE SIDE PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-253

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

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

ACCEPTED with COMMENTS in EPA Letter Dated JAN 22 2004

NOTE: Spanish language is optional

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registered under EPA Reg. No. 228-253

Revised 3/7/03 Changed First Aid Statement per PR 2001-1 and Consumer Disposal Statement per PR 2001-6 via Amendment. A/O 7/15/03 Split labels per EPA 5/28/03 Meeting and letter dated 7/15/03.

(Side Panels)

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

CAUTION - CAUTION

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.

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. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater 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.

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 has been proven to be a very useful herbicide for control of the surface-creeping or prostrate broadleaf weeds listed below.

MCPP-2 AMINE may be used on Residential Ornamental Turf grasses with greater safety than 2,4-D.

This herbicide may be used on Washington and Toronto bentgrasses, Kentucky and Merion bluegrasses but use caution on Seaside, Arlington and Congressional bents which may be injured. MCPP-2 AMINE is not recommended for St. Augustine grass and Centipedegrass, as it can cause damage to these species. Do not use MCPP-2 AMINE on newly sown lawns or turf for six months after planting. Avoid drift onto other plants and do not use the first cuttings after treatment as a mulch for flowers and vegetables. Apply MCPP-2 AMINE on a warm, calm day in Spring or Fall when weeds are growing vigorously. For Knotweed, apply

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in Spring or early Summer. Use any suitable sprayer or watering can with a fine nose to give a uniform coverage of the weeds. Although this herbicide is relatively slow in action, it gives a superior result on the more difficult to control weeds such as:

MORE SUSCEPTIBLE WEEDS

Controlled by 1.3 to 2 ozs. MCPP-2 AMINE per 1,000 sq.ft.

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

LESS SUSCEPTIBLE WEEDS

Controlled by 3.0 ozs. MCPP-2 AMINE per 1,000 sq.ft. Repeat applications at half the recommended dosage may give better control.

Black medic	Knotweed	Purslane
Dock	Morningglory	Speedwell
Henbit	Pennywort	Yarrow

etter control of the weeds classified as Less Susceptible Weeds, especially Knotweed, may be obtained with repeat applications of half the recommended dose carried out at not less than weekly intervals. This application practice is preferred, especially on bent grasses.

PREPARATION OF THE SPRAY: Fill half the spray tank with water; then add the required amount of MCPP-2 AMINE. Mix thoroughly, adding the remainder of water during the operation.

(Right Side Panel)

DIRECTIONS FOR USE (continued)

<u>Rate of Use</u>	<u>Per 1,000 Sq. Ft.</u>
Established fine turf lawns	2 fluid oz. in 2-1/2 gallons of water
Established lawns	3 fluid oz. in 2-1/2 gallons of water

TIME OF APPLICATION: To obtain the best results, MCPP-2 AMINE must be applied when the weeds are most susceptible and conditions are such that no damage to the grasses will occur. Apply MCPP-2 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-2 AMINE particularly when temperatures exceed 90°F. Do not apply when turf is suffering from drought conditions or during very hot or very wet weather, or damage to turf may result. 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 apply 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.

STORAGE AND DISPOSAL

STORAGE: To be stored in original container and placed in an area inaccessible to children. If allowed to freeze, shake well to remix before using.

DISPOSAL: If empty - Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled** - If product cannot be used as directed, or offered to others for their use, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

Note: Local conditions may affect use of this herbicide. Consult local Agricultural Experiment Station, Extension Service weed specialist, or State regulatory agencies for recommendations in your area.

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 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 a claim is made. (RV 071503)

(Commercial Label)

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RIVERDALE[®]

MCPP-2 AMINE

For Control of Broadleaf Weeds on Lawns,
Golf Courses and Ornamental Turf

ACTIVE INGREDIENT:

Dimethylamine Salt of 2-(2-Methyl-4-Chlorophenoxy)propionic Acid*	25.96%
INERT INGREDIENTS:	74.04%
TOTAL	100.00%

By Isomer Specific Assay AOAC Method, Equivalent to:

*2-(2-Methyl-4-Chlorophenoxy)propionic Acid 21.45%, 1.9 lbs./gal.

Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

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- 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. 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 washwater 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-2 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 insecticide 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.

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MCPP has been proven to be a very useful herbicide for control of the surface-creeping or prostrate broadleaf weeds listed below.

MCPP-2 AMINE may be used on Ornamental Turf Lawns (Residential, Industrial and Institutional), Parks, Cemeteries, Athletic Fields and Golf Courses (Fairways, Aprons, Tees and Roughs) and similar turf areas with greater safety than 2,4-D.

This herbicide may be used on Washington and Toronto bentgrasses, Kentucky and Merion bluegrasses but use caution on Seaside, Arlington and Congressional bents which may be injured. MCPP-2 AMINE is not recommended for St. Augustine grass and Centipedegrass, as it can cause damage to these species. Do not use MCPP-2 AMINE on newly sown lawns or turf for six months after planting. Avoid drift onto other plants and do not use the first cuttings after treatment as a mulch for flowers and vegetables. Apply MCPP-2 AMINE on a warm, calm day in Spring or Fall when weeds are growing vigorously. For Knotweed, apply in Spring or early Summer. Use any suitable sprayer or watering can with a fine nose to give a uniform coverage of the weeds. Although this herbicide is relatively slow in action, it gives a superior result on the more difficult to control weeds such as:

MORE SUSCEPTIBLE WEEDS

Controlled by 2 pints MCPP-2 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 8 pints MCPP-2 AMINE per acre. Repeat applications at half the recommended dosage may give better control.

Black medic	Knotweed	Purslane
Dock	Morningglory	Speedwell
Henbit	Pennywort	Yarrow

Better control of the weeds classified as Less Susceptible Weeds, especially Knotweed, may be obtained with repeat applications of half the recommended dose carried out at not less than weekly intervals. This application practice is preferred, especially on bent grasses, tees and aprons.

PREPARATION OF THE SPRAY: Fill half the spray tank with water; then add the required amount of MCPP-2 AMINE. Mix thoroughly, adding the remainder of water during the operation.

(Right Side Panel)

DIRECTIONS FOR USE (continued)

Rate of Use	Per 1,000 Sq. Ft.	Per Acre
Established greens, and fine turf lawns	2 fluid oz. in 2-1/2 gallons of water	5 pints in 20 to 40 gallons of water
Established lawns, golf fairways	3 fluid oz. in 2-1/2 gallons of water	8 pints

TIME OF APPLICATION: To obtain the best results, MCPP-2 AMINE must be applied when the weeds are most susceptible and conditions are such that no damage to the grasses will occur. Apply MCPP-2 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-2 AMINE particularly when temperatures exceed 90°F. Do not apply when turf is suffering from drought conditions or during very hot or very wet weather, or damage to turf may result. This chemical is absorbed by the foliage of broadleaf weeds and is translocated throughout the whole plant to roots, etc. where it

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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 apply 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.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: 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. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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 may affect use of this herbicide. Consult local Agricultural Experiment Station, Extension Service weed specialist, or State regulatory agencies for recommendations in your area.

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 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 a claim is made.

(RV 071503)