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Mr. Russell F. Sawyer
Riverdale Chemical Company
425 West 194th Street
Glenwood, Illinois 60425-1584

OCT 22 1997

Dear Mr. Sawyer:

Subject: Label Revision Amendment-Reword Use Sites and Revise
Storage Statement
EPA Registration Number 228-281
Your amendment application submission dated
September 3, 1997

The labeling 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. Under the STATEMENT OF PRACTICAL TREATMENT, please update your oral first aid statement to read as the following:

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.
2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy is enclosed for your records.

If you have any questions about this letter, please contact Marcel Howard at 703-305-6784.

Sincerely yours,

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

CONCURRENCES

SYMBOL *	7505C						
SURNAME *	MHOWARD						
DATE *	Oct 21, 1997						

(Non-Commercial Label)

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RIVERDALE

DISSOLVE® WEED AND FEED

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE AND TURF FOOD COMBINATION WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS WHILE PROVIDING BOTH FAST AND LONG FEEDING ACTION.

Weeds contacted by this product gradually die and disappear from the lawn.

Treats (or covers) 5,000 Sq. Ft. (50' x 100')

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	0.56%
Dimethylamine Salt of 2-(2-Methyl-4-Chlorophenoxy)propionic Acid**	0.29%
Dimethylamine Salt of 2-(2,4-Dichlorophenoxy)propionic Acid***	0.29%
INERT INGREDIENTS:	98.86%
TOTAL	100.00%

ISOMER SPECIFIC AOAC METHOD, EQUIVALENT TO:

*2,4-Dichlorophenoxyacetic Acid	0.46%
**2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.24%
***2-(2,4-Dichlorophenoxy)propionic Acid	0.24%

GUARANTEED ANALYSIS:°

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash(K ₂ O)	X%

Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.

Chlorine (Cl) Maximum X%

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

Fertilizer guaranteed by (Name of fertilizer registrant)

†DISSOLVE® - A Registered Trademark of Riverdale Chemical Company Patent No. 5,266,553

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET WEIGHT LBS.

EPA REG. NO. 228-281

EPA EST. NO. 228-IL-1

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ACCEPTED with COMMENTS In EPA Letter Dated

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

OCT 22 1997

GLENWOOD, ILLINOIS 60425-1584

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

228-281

(Back Panel)

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

Causes moderate eye injury. Harmful if absorbed through skin. Avoid inhalation of dust and contact with eyes, skin, or clothing. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. The maximum number of broadcast applications per treatment site is 2 per year. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until dust has settled.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention. *Add Cat. III oral first aid statement*
IF IN EYES: Flush eyes with water for 15 minutes. Get medical attention.
IF ON SKIN: Wash skin with soap and water. Get medical attention.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and 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 washwaters.

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.

DISSOLVE® WEED AND FEED is a stable mixture of three herbicides. It is for use on Ornamental Turf such as Lawns, Parks, Cemeteries, Golf Courses (Fairways, Aprons, Tees, and Roughs) and similar non-crop areas.

This product may be used on Bahia, common Bermuda, Bluegrass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth in lawns and control many broadleaf weeds such as: Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, Bident, Bindweed, Bitterweed, Bitter wintercress, Black medic, Blessed thistle, Blue lettuce, Box elder, Broomweed, Buckhorn, Bull thistle, Burdock, Bur ragweed, Buttercup, Canada thistle, Carpetweed, Catnip, Chickweed, Chicory, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common sowthistle, Creeping jenny, Croton, Curly indigo, Dandelion, Dock, Dogbane, Dogfennel, Elderberry, English daisy, Flea bane (daisy), Flixweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Gumweed, Hawkweed, Healall, Heartleaf drymary, Hemp, Henbit, Hoary cress, Honeysuckle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knotweed, Lambsquarter, Locoweed, Lupine, Mallow, Marshelder, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nutgrass, Orange hawkweed, Oxalis, Parsnip, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prickly lettuce, Primrose, Puncture vine, Purslane, Ragweed, Red clover, Red sorrel, Rush, Russian thistle, St. Johnswort, Sheep sorrel, Shepherdspurse, Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spurge, Spurweed, Stinkweed, Stitchwort, Sumac, Sunflower, Sweet clover, Tarweed, Thistle, Toadflax, Tumbleweed, Velvet leaf, Veronica, Vervain, Vetch, Virginia buttonweed, Virginia creeper, Wild aster, Wild carrot, Wild garlic, Wild geranium, Wild lettuce, Wild onion, Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Willow, Witchweed, Woodsorrel, Wormseed, Yarrow, Yellow rocket, and other broadleaf weeds.

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers;

especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 20 (or 18) pound bag should be used on 5,000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is equal to one application.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds (3.6 pounds for 18# bag) per 1,000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 1 pound (.9 lb. for 18# bag) per 250 square feet.

SPREADER SETTINGS

ONE PASS APPLICATION:

<u>MAKE</u>	<u>SETTING</u>
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

Sweep (do not wash) all fertilizer materials from surfaces immediately after application, because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

(The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 pound of nitrogen/1,000 square feet; otherwise, this information is optional.)

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing *(No. of lbs.)* pounds of nitrogen per 1,000 square feet (optional P₂O₅ and K₂O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

*Based in Inert Fertilizer claimed.

STORAGE AND DISPOSAL

STORAGE: Store in original container and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near feed or foodstuffs. To prevent cross-contamination, do not store near open containers of fertilizers, seed, or other pesticides.

PRODUCT DISPOSAL: To dispose of bag which contains unused product, securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse empty bag. Fold empty bag and discard in trash.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(ERP 061594) (PR938 042194/RV 090397)

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.

(Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

OPTIONAL MARKETING STATEMENTS:

Contains Dissolve® A Premium Broadleaf Herbicide

Environmental Benefits

(Grasscycling Logo)

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.

- ✓ A 50' x 50' lawn produces enough oxygen for a family of 4 every day
- ✓ Reduces Glare & Reduces Noise
- ✓ Traps Dust, Smoke Particles & other Pollutants
- ✓ Purifies Water & Modifies Temperature
- ✓ Improves Soil Condition & Controls Erosion

The following note will not be part of the actual label copy.

*NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. Chlorine declaration and fertilizer guarantee are optional except where mandated by State fertilizer regulation.

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Riverdale Dissolve® Weed and Feed (Non-Commercial)

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Alternate (Optional) Marketing and Fertilizer Statements

Provides Fast Green-Up & Slow Release for Long Feeding.

Easy to Use

Satisfaction Guaranteed

If you are not satisfied with the product results, simply send proof of purchase to (Name of Distributor) for replacement product voucher.

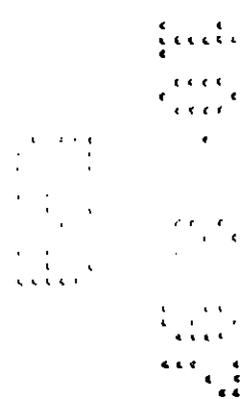
CONTAINS ELEVEN ESSENTIAL ELEMENTS, INCLUDING EXTENDED TIME-RELEASE NITROGEN, TO PRODUCE EXCELLENT RESULTS REGARDLESS OF GRASS TYPE OR SOIL QUALITY.

DUAL ACTION

SPECIAL FALL GRASS TIME-RELEASE FERTILIZER

GREENS IN AUTUMN HASTENS SPRING RECOVERY

KILLS WEEDS AND FORTIFIES YOUR LAWN.



7 7 9

Alternate (Optional) Marketing and Fertilizer Statements

EFFECTIVELY KILLS DANDELIONS AND BROADLEAF WEEDS

NITROGEN: Slow release for growing a thick green lawn

PHOSPHATE: Improves root growth and plant food storage capabilities.

POTASH: Vital for growth. Improves plant hardiness and drought resistance.

*Provides phosphate and potash plus time-released Nitrogen which encourages grass to fill in bare spots weeds leave behind.

*Contains Sulfur which helps maintain dark green color and encourages plants and root growth.

Controls a wide range of broadleaf weeds and feeds your lawn to help it grow thick and green!

<p>_____ Length</p> <p>X _____ Width</p> <p>= _____ Total Sq. Ft.</p> <p>- _____ Non-Lawn Areas</p> <p>= _____ Total Sq. Ft. Coverage Needed</p>	<p>ILLUSTRATION</p>	<p>To determine how much you need, multiply the length of your lawn by its width. This equals your total square footage. Deduct any non-lawn areas (house, garden, etc). One bag covers 5,000 square feet.</p>
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Spreader settings are approximate. Differences may occur due to condition of spreader, speed at which applied and roughness of area treated. Be sure to check spreader at the beginning of the application; adjust spreader if necessary. Consult owner's manual. DO NOT HAND SPREAD. Close spreader openings when loading, turning or when stopped.

<p>ILLUSTRATION</p>	<p>Broadcast Spreader Settings One Pass Application</p> <p>Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.</p>	<p>ILLUSTRATION</p>
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<p>ILLUSTRATION</p>	<p>Drop Spread Settings One Pass Application</p> <p>First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.</p>	<p>ILLUSTRATION</p>
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Rids your lawn of undesirable weeds and feeds it to help it grow thick and green! For best results, water lawn first. Apply (product name) while lawn is wet. Wait 48 hours, then water lawn as needed. DO NOT APPLY DURING TIME PERIODS WHEN THE MAXIMUM DAILY TEMPERATURE IS IN EXCESS OF 90° F.

ILLUSTRATION	Broadcast Spreader Settings One Pass Application For best results, apply in a circular path starting on the outside and working overlap of product will	ILLUSTRATION
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ILLUSTRATION	Drop Spread Settings One Pass Application First, apply 2 border strips along the edge of each end of the lawn. Then apply the lawn, overlapping the spreader before turning as you reach the edge of the border strips.	ILLUSTRATION
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Most fertilizers will stain sidewalks, patios, swimming pools and other concrete surfaces. Remove spillage promptly by sweeping, vacuuming or blowing.

(Additional Optional Fertilizer and Advertising Information)

For Use on Fescue, Rye, Blue and Other Listed Grasses

(ILLUSTRATION)

- * Exclusive DeepGreen® Feeding System Helps Improve A Lawn's Winter Hardiness While Eliminating Weeds.
- * Builds Strong Root Systems And Promotes Spring Green-Up.
- * 100% Satisfaction Guaranteed.
- * Toll-Free Helpline: 1-888-XXXXXX-1

EXPERIENCE THE (SELLER'S NAME) ADVANTAGE™

(Seller's Name) has the extraordinary DeepGreen® nutrient delivery system containing an exclusive polymer-coated time-release nitrogen source, assuring you the predictable, continuous feeding ordinary soluble lawn fertilizers can't deliver. So you'll enjoy the advantage of a consistently beautiful lawn week after week.

(Illustration)

(Seller's) DeepGreen® System Feeds Your Lawn Continuously When Ordinary Soluble Fertilizers Can't.

The above suggested spreader settings are approximate. In general, spreaders should be calibrated to apply 1 lb. of this fertilizer product per 275 square feet of lawn.

Be sure to close spreader openings when loading, turning or when stopped.

(SELLER'S NAME) 100% GUARANTEE OF SATISFACTION

If not totally satisfied with the results of this product, simply send proof of purchase and a brief description of your problem to (Seller name & address) for a prompt refund.

(SELLER'S NAME) HELPLINE

Questions concerning lawn care or fertilizer application? Just call toll free 1-888-XXXXXX-1

Made in the U.S. (with flag illustration)