

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG - 2 1995

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

Dear Mr. Sawyer:

Subject: Revised Labeling - Product Name Change
Riverdale 2,4-D Technical Amine
EPA Registration No. 228-294
Your Submission Dated January 3, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) We have received your request to change the official product name for this product and have determined it to be acceptable. We acknowledge the official product name to now be "Riverdale 2,4-D Technical Amine". Please use this name in all future correspondence with the Agency regarding this product.
- 2) Add the statement "Avoid breathing vapor" to the Precautionary Statements.
- 3) Add an inhalation statement to the Statement of Practical Treatment to read as follows:

"IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.
- 4) Revise the end of the IF ON SKIN statement to read "...if irritation persists".

DK: 305-7546: FHB / PM23		CONCURRENCES					
SYMBOL	7505C						
SURNAME	D. KENNY						
DATE	7/27/95						

10/16

- 5) Within the Clothing Requirement Statements for Residential and Turf Uses, revise the beginning of the statement regarding commercial mixer/loader/applicators of liquid products, except when applying to a golf course, carrying "WARNING" or "DANGER" signal word (statement 3b of this section) to read "When mixing, loading or applying this product...".

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

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

Enclosure

3 of 6

WITH COMMENTS
In EPA Letter Dated
AUG - 2 1935

RIVERDALE

2,4-D TECHNICAL AMINE

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-294

ACTIVE INGREDIENT:	Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid*	56.3%
INERT INGREDIENTS:		33.7%
	TOTAL	100.0%

Isomer Specific AOAC Method, Equivalent to:
*2,4-Dichlorophenoxyacetic Acid 55.1%, 5.64 lbs./gal.

FOR MANUFACTURE OF HERBICIDES ONLY

KEEP OUT OF REACH OF CHILDREN • CAUTION

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Avoid contact with skin, eyes, and clothing. Do not use this product in such a manner as to expose workers or other persons. The area where this product is being used must be vacated by unprotected persons.

STATEMENT OF PRACTICAL TREATMENT

- IF SWALLOWED: Induce vomiting immediately by giving two glasses of water and sticking finger down throat. Never give anything by mouth to an unconscious person. Get medical attention.
- IF IN EYES: Flush eyes with plenty of water for at least 15 minutes. Get medical attention.
- IF ON SKIN: Wash exposed skin gently with plenty of soap and water. Get medical attention if irritation occurs.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

This pesticide may be used only for the formulation of a herbicide. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

1. AGRICULTURAL CROPS: Corn, Sorghum, Wheat, Barley, Rye, Oats, Grasses - Annual, Grasses - Perennial, Sugarcane and Soybeans
TERRESTRIAL NONFOOD CROPS: Ornamental trees, shrubs and vines; Lawn and turf grasses; Uncultivated agricultural areas; Uncultivated nonagricultural areas; General soil treatment; Recreation areas; Industrial sites; Paved areas and outdoor areas
FORESTRY SITES: Forest trees, plantings and forest tree nurseries
2. Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.*
3. Uses for experimental purposes that are in compliance with U.S. EPA requirements.*

*NOTICE: Riverdale makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to these uses of the product sold, including, but not limited to, merchantability, fitness for a particular purposes, use of eligibility of the product for any particular trade usage.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf uses after June 15, 1994, must contain the revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below.

GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING

1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."
2. Containers of 5 gallons or more in capacity must also bear the following statement: "a mechanical system (probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal."

SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING

1. FOR AGRICULTURAL USES

- a. Clothing Requirement Statements: "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."
- b. Personal Hygiene Statements: "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."
- c. The maximum application rate to pasture and rangeland is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per acre per application per site.
- d. The maximum application rate to forestry site preparation is the lower of 1) existing application rate on currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application per site.
- e. A reentry interval is required and should be in accordance with the Worker Protection Standards, 40 CFR Parts 156 and 170.

2. FOR INDUSTRIAL/AQUATIC USES

- a. Clothing Requirement Statements: "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab eye protection is not required."
- b. Personal Hygiene Statements: "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands, face and arms before using toilet. After work remove all clothing and

shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.:

3. FOR RESIDENTIAL AND TURF USES

- a. Clothing Requirement Statements: 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."; 2) For homeowners and other non-commercial users of liquid 2,4-D products, and for commercial mixer/loader/applicators of liquid 2,4-D products when the product is to be applied to a golf course: a) For Amine Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks and shoes and rubber gloves."; b) For Amine Liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."; c) For Acid, Sodium Salt and Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; d) For Acid, Sodium Salt and Ester Liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection." 3) Commercial mixer/loaders/applicators of liquid 2,4-D products, except when the product is to be applied to a golf course; a) For products carrying "CAUTION" signal word: "When mixing loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; b) For products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."
- b. Personal Hygiene Statements: 1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."; 2) For All Liquid Products: "After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower."
- c. The maximum application rate to turf is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per application per site. The maximum number of broadcast applications **per treatment site is 2 per year. **One application may be defined as treating the entire area in two passes at the half rate each time (i.e. crisscrossing from end to end and then side to side).
- d. The following reentry statement must be included: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled."

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a cool, dry secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Containers should be opened in well ventilated areas. Keep container tightly sealed when not in use. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. If container is damaged or if pesticide has leaked clean up all spilled material. Place in closed labeled container. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal law and may contaminate groundwater. 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.

NOTICE: Seller makes no warranty expressed or implied concerning the use of this product other than indicated on this label. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions give herewith.
(ERP 061593) (PR9310 100195)

EPA REG. NO. 228-294

MET CONTENTS GALS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY
RIVERDALE CHEMICAL COMPANY
GLENWOOD, ILLINOIS 60425-1584