1/9



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

MAR 2 4 2003

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Russell F. Sawyer Nufarm Americas Inc. 1333 Burr Ridge Parkway, Suite 125A Burr Ridge, IL 60521-0866

Dear Mr. Sawyer:

Subject:

Revised Label

Riverdale Dissolve Granular Weed Killer

EPA Registration Number 228-305

Your Submission Dated February 28, 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:
 - Delete "and similar non-crop areas". This phrase implies that this product could be applied to sites other than ornamental turf.
- 2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

(5)

Donald R. Stubbs, Chief Herbicide Branch Registration Division (7505C)

Enclosure

RIVERDALE®

DISSOLVE® GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS

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

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

GET THE OPTICAL ADVANTAGE®

ACTIVE INGREDIENTS:		
Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	 	0.700%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**		0.182%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***	 	0.179%
INERT INGREDIENTS:		98.939%
TOTAL		100.000%
ISOMER SPECIFIC METHOD, EQUIVALENT TO: *2,4-Dichlorophenoxyacetic Acid	 	. 0.15%
Riverdale, Dissolve and The Optical Advantage are Registered Trademarks of R		

Patent No. 5,266,553 Nufarm Company

> ACCEPTED with COMMENTS In EPA Letter Dated: MAR 24 2003

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-305

NET WEIGHT

LBS.

EPA EST. NO. 228-IL-1

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

3/q

(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.

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 Take off contaminated clothing. Rinse skin immediately with plenty of or CLOTHING: water for 15 to 20 minutes. Call a poison control center or doctor for

treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth is

ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment

advice.

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® GRANULAR WEED KILLER 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 other 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 control many broadleaf weeds, such as: Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, Biden, Bindweed, Bitterweed, Bitter winter cress, 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 pound bag should be used on 5000 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 per 1000 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 sq. ft. and adjust to apply at the rate of 1 lb. per 250 sq. ft.

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

5/g

Environmental Benefits Grasscycling

(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

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 other feed or foodstuffs. To prevent cross-contamination, do not store near open containers of fertilizer, seed or other pesticide.

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.

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.

(RV 022803)

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

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

"Note: Spreader Settings will vary among various commercial manufacturers.

(Commercial Label)

RIVERDALE®

EN THE COUNTRY COS DISSOLVE® GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS

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

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

GET THE OPTICAL ADVANTAGE®

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*						.700%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic A	Acid	**E	‡		0	.182%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid**	**‡				0	.179%
INERT INGREDIENTS:	•				98	.939%
TOT	AL		•		100	.000%
ISOMER SPECIFIC METHOD, EQUIVALENT TO: *2,4-Dichlorophenoxyacetic Acid						0.15%

Riverdale, Dissolve and The Optical Advantage are Registered Trademarks of Riverdale - A Nufarm Company Patent No. 5,266,553

> ACCEPTED with COMMENTS In EPA Letter Dated: MAR 2 4 2003

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

NET WEIGHT

LBS.

EPA REG. NO. 228-305

ACTIVE INGREDIENTS:

EPA EST. NO. 228-IL-1

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

(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, shoes and gloves when loading and 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.

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.

IF INHALED:

Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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, nor pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D, MCPP and 2,4-DP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling these phenoxy 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. READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

DISSOLVE® GRANULAR WEED KILLER 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 other similar non-crop areas.

Page 3

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 control many broadleaf weeds, such as: Alder, Artichoke, Aster, Austrian fieldcress, Beggartick, Biden, Bindweed, Bitterweed, Bitter winter cress, 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, Shepherds-purse, 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 pound bag should be used on 5000 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 also acceptable.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds per 1000 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 sq. ft. and adjust to apply at the rate of 1 lb. per 250 sq. ft.

SPREADER SETTINGS ONE PASS APPLICATION:

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

Page 4

Environmental Benefits (Grasscycing

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
- ✔ Purifles Water & Modifies Temperature
- ✓ Improves Soil Condition & Controls Erosion

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near open containers of fertilizer, seed or other pesticide. Do not stack more than two pallets high. 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. Improper disposal of excess pesticide, spray mixtures 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay away from smoke.

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.

(RV 022803)

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

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

"NOTE: Spreader Settings will vary among various commercial manufacturers.