

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

SEP 7 1999

Dear Mr. Sawyer:

Subject: Label Revision Amendment-Revised Refill Instructions
Horsepower Lawn Weed Killer
EPA Registration No. 228-334
Your Correspondence Letter Submission Dated
April 14, 1999

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[Non-Commercial Label]:
 - a. On the front panel of your product label under the heading entitled "**KILLS (OR CONTROL)**," reinstate the following weeds: "Black medic, Knotweed, Plantain, Oxalis".
2. Please submit one (1) final printed copy of the referenced label, incorporating the above change, before releasing the product for shipment.

If you have any concerns or questions regarding this letter, please call Marcel Howard at (703)305-6784.

A stamped copy is enclosed for your records.

Sincerely yours,

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

Enclosures

CONCURRENCES

| | | | | | | | | |
|-----------|-------------|--|--|--|--|--|--|--|
| SYMBOL ▶ | 7505C | | | | | | | |
| SURNAME ▶ | MHoward | | | | | | | |
| DATE ▶ | Sep 3, 1999 | | | | | | | |

(Non-Commercial Label)

RIVERDALE

HORSEPOWER™ LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL
IN ORNAMENTAL LAWNS AND TURF GRASSES

CONTAINS MCPA, TRICLOPYR AND DICAMBA

KILLS (OR CONTROLS): Dandelion, Chickweed, Elm Tree, Knotweed, ...
Clover, Cocklebur, Thistle and many other species of
broadleaf weeds; some of which are listed on this label.
One quart covers 10,000 sq. ft.

ACTIVE INGREDIENTS:

| | |
|---|---------|
| Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid* | 13.72% |
| Triethylamine Salt of 3,5,6-Trichloro-2-Pyridinyloxyacetic Acid** | 1.56% |
| Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)*** | 1.35% |
| INERT INGREDIENTS: | 83.37% |
| TOTAL | 100.00% |

By Isomer Specific Method, Equivalent to:

| | |
|---|-------------------------|
| *2-Methyl-4-Chlorophenoxyacetic Acid | 11.20%, 0.970 lbs./gal. |
| **3,5,6-Trichloro-2-Pyridinyloxyacetic Acid | 1.12%, 0.097 lbs./gal. |
| ***3,6-Dichloro-o-Anisic Acid | 1.12%, 0.097 lbs./gal. |

HORSEPOWER™ - Is A Trademark of Riverdale Chemical Company

KEEP OUT OF REACH OF CHILDREN

WARNING - AVISO

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

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND
STATEMENT OF PRACTICAL TREATMENT

EPA REG. NO. 228-334

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 7 1999

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

228-334

NOTE: Spanish language is optional

Revised 4/14/99

Reinserted Refill Instructions per EPA suggested text. Also removed
"AOAC", already on CSF

(Side Panels)

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING - AVISO**

Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles, face shield or safety glasses when mixing, pouring this concentrate from one container to another and when removing or reattaching container closure/spray nozzle. After product has been diluted in accordance with Directions for Use, eye protection is not required. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

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. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not contaminate water when disposing of equipment washwaters. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes.

Most cases of ground water contamination involving phenoxy herbicides such as MCPA 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.

Horsepower Lawn Weed Killer is for use on Ornamental Turf such as Lawns, Parks, Cemeteries, Golf Courses (Fairways, Aprons, Tees and Roughs), and similar non-crop areas.

USE PRECAUTIONS

Spray when air is calm to avoid spray drift. Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants. Avoid fine mists. Use lawn type sprayer with coarse spray as wind drift is less likely. Do not use on Carpetgrass, Dichondra, nor on lawns or turf where desirable clovers are present. Avoid contact with exposed feeder roots of ornamentals and trees. Maximum kill (or control) of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. Spray entire lawn, wetting weeds and lawn grasses. Do not exceed specified dosages for any area; be particularly careful within the dripline of tree and other ornamental species. Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90°F.

Avoid application to Centipede, or St. Augustine grasses unless turf injury can be

tolerated. The suitable use of Horsepower Lawn Weed Killer on non-recommended turf species may be determined by treating a small area at any rate/sq. ft. which does not exceed 3 pints/12,000 sq.ft. Prior to treatment of larger areas, the treated area should be observed for any sign of turf injury for a period of 30 days of normal growing conditions to determine the phytotoxicity and efficacy to the treated area. The user assumes the responsibility for any plant damage or other liability resulting from the use of this product on species not recommended on this label.

For optimum results: (1) avoid applying during excessively dry or hot periods unless irrigation is used; (2) avoid applying if rainfall is expected within 24 hours, nor should lawns be irrigated (watered) for 24 hours following application. If lawn needs watering, water thoroughly before application; (3) turf should not be mowed 1 to 2 days before and following application; (4) reseed no sooner than 3 to 4 weeks after application of this product. Adding oil, wetting agent, or other surfactant to the spray may be used to increase effectiveness on weeds but doing so may reduce selectivity to turf resulting in turf damage. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other sprays.

WEEDS CONTROLLED BY HORSEPOWER LAWN WEED KILLER

Alfalfa, Amaranth, Aster, Beadstraw, Bedstraw, Beggartick, Beggarweed, Bindweed, Bitter
neezweed, Black medic, Bladder campton, Bracken fern, Broomweed, Buckhorn, Buckwheat,
uffalobur, Burclover, Burcucumber, Burdock, Bursage, Buttercup, Canada thistle,
Carpetweed, Catnip, Catsear, Chamise, Chamomile, Chickweed, Chicory, Cinquefoil, Clover,
Cocklebur, Coffeeweed, Cornflower, Cornspeedwell, Croton, Daisy, Dandelion, Dock, Dog
fennel, Dragonhead mint, Evening primrose, Field pennycress, Fleabane, Florida pusley,
Frenchweed, Galinsoga, Geranium, Goatsbeard, Goldenrod, Goosefoot, Gromwell, Ground ivy,
Halfshrub sundrop, Hawkweed, Healall, Heartleaf drymary, Hemp sesbania, Hempnettle,
Henbit, Horsenettle, Horsetweed, Ironweed, Jerusalem artichoke, Jimsonweed, Knapweed,
Knapwood, Knawel, Knotweed, Kochia, Ladysthumb, Lambsquarter, Lespedeza, Little starwort,
Mallow, Marc's Tail, Marshelder, Matchweed, Mayweed, Milkweed, Morningglory, Mustard,
Nightflowering catchfly, Nightshade, Oxalis (Stricta and corniculata), Parsley-piert,
Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison
oak, Pokeweed, Poorjoe, Prickly sida, Prickly lettuce, Puncturevine, Purslane, Ragweed,
Red sorrel, Red clover, Redevine, Redstem, Rubberweed, Sheep sorrel, Shepherdspurge,
Sicklepod, Smartweed, Snakeweed, Sowthistle, Speedwell, Spiderwort, Spikeweed, Spiny,
Spurge, Spurry, Spurweed, Starbur, Stinging nettle, Stitchwort, Stunkweed, Sumpweed,
Sunflower, Tansy ragwort, Teasel, Teaweed, Texas blueweed, Thistle, Thistle, Toadflax,
Trumpetcreeper, Velvetleaf, Veronica, Vetch, Waterhemlock, Waterhemp, Whitebrush, Wild
violet, Wild radish, Wild onion, Wild aster, Wild carrot, Wild lettuce, Wild garlic, Wild
geranium, Wood sorrel, Wormwood, Yankeeweed, Yarrow, Yellow starthistle, Yellow rocket,
and many other broadleaf weeds.

ORNAMENTAL LAWNS AND TURF

Apply Horsepower Lawn Weed Killer at the rate of 2 pints in 4 to 50 gallons of water per 10,000 sq. ft. (3.2 fluid ounces in 1/2 to 5 gallons of water per 1,000 square feet) to control weeds growing in turf planted to Bluegrass, Fescue, Rye, Bent (excluding golf course greens and tees), Bahia, Bermuda and Zoysia.

Disposable Sprayer and Bottle Instructions: Determine area to be sprayed. Apply at a rate of 32 oz. (1 quart) per 10,000 sq.ft. Remove bottle cap and screw bottle into nozzle. Connect spray nozzle to hose while holding sprayer at waist level, point in direction away from face and body. Turn on the water at the tap. Place finger over hole on right side of nozzle (or turn on/off lever to the "ON" position) and the Lawn Weed Killer will mix automatically at the proper ratio. Walk back and forth at steady pace.

2,000 Sq. Ft.

4,000 Sq. Ft. (Optional marks on left for 1 qt. disposable bottle. Not to scale.)

6,000 Sq. Ft.

8,000 Sq. Ft.

10,000 Sq. Ft.

For Refill of Horsepower Spot Weed Killer: Put 1.7 ounces of Horsepower Lawn Weed Killer into the labeled empty quart container. Then add 30 ounces of tap water. Trigger Sprayer - adjust spray nozzle to give coarse spray. Aim at center of weed and spray to wet. Applicator Cap - Hold applicator end about 6 inches from surface to be treated and thoroughly wet. To obtain wider coverage raise container. One application should be sufficient. Effects begin to show after a few days and weeds gradually die. Repeat as necessary.

STORAGE AND DISPOSAL

STORAGE: To be stored in original container and placed in an area inaccessible to children.

PESTICIDE (OR PRODUCT) DISPOSAL: Partially filled container may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Rinse thoroughly before discarding in trash. Do not reuse empty container.

NOTICE: Buyer assumes all risks of use, storage and handling of this product not in strict accordance with directions given herewith. (RV 041499)

(Commercial Label)

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EPA REG. NO. 228-334

NET CONTENTS GALS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

NOTE: Spanish language is optional

**ACCEPTED
with COMMENTS
In EPA Letter Dated
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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 fertilizers, seeds or other pesticides. 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 container tightly sealed when not in use. Do not stack cardboard cases more than two pallets high. 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. Improper disposal of excess pesticide, spray mixtures, or rinsate is a violation of Federal law. 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. Plastic containers are also disposable by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE: Buyer assumes all risks of use, storage and handling of this product not in strict accordance with directions given herewith. (EV 041499)