

228-337

10-31-2003

1/8



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT 31 2003

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

Dear Mr. Sawyer:

Subject: Revised Labeling
Riverdale XRM-5202 Premium Weed Killer
EPA Registration Number 228-337 ✓
Your Submission Dated October 10, 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 front panel specify:

Non-residential ornamental lawns and turf grasses

b. In the Oregon restriction delete "Agricultural" and "Forest". This product is not registered for use in these sites.

c. Under directions for use clarify the directions so it is clear that application is only to non residential ornamental turf:

For use only on non-residential ornamental turf (athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides).

d. Delete the comma "," after Non-residential and "except as noted on the front cover"

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.

2/8

-2-

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

Sincerely yours,

JSI

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

Enclosure

3/8

(Commercial Only Label)

RIVERDALE®

XRM-5202 PREMIUM LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL IN
ORNAMENTAL LAWNS AND TURF GRASSES
And Other Listed Sites

ACCEPTED
with COMMENTS
Letter Dated

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 31 2003

For Both Northern and Southern Grasses
Kills (or Controls) Weeds - Not lawn grasses

CONTAINS 2,4-D, TRICLOPYR, AND CLOPYRALID

One Quart Covers Up to 10,000 Square Feet
(See Directions for Different Grasses.)

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

228-337

ACTIVE INGREDIENTS:

Triisopropanolamine Salt of 2,4-Dichlorophenoxyacetic Acid*	14.19%
Triethylamine Salt of 3,5,6-Trichloro-2-Pyridinyloxyacetic Acid**	1.06%
3,6-Dichloro-2-Pyridinecarboxylic Acid***	0.36%
INERT INGREDIENTS	84.39%
TOTAL	100.00%

By Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	7.61%	0.660 lbs./gal.
**3,5,6-Trichloro-2-Pyridinyloxyacetic Acid	0.76%	0.066 lbs./gal.
***3,6-Dichloro-2-Pyridinecarboxylic Acid	0.36%	0.031 lbs./gal.

Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

IN OREGON, THE USE OF THIS PRODUCT IS LIMITED TO THE SITES STATED ON THIS LABEL WHICH ARE
AGRICULTURAL, FOREST, RIGHT-OF-WAY, GOLF COURSE OR CEMETERY SITES. IN CALIFORNIA AND
WASHINGTON, TURFGRASS AND LAWN USES ARE RESTRICTED TO GOLF COURSES ONLY.

KEEP OUT OF REACH OF CHILDREN

CAUTION

**SEE SIDE PANELS FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS**

EPA REG. NO. 228-337

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

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

Revised 4/4/03 Changed First Aid Statement per PR 2001-1 via Amendment.
10/10/03 Revised per EPA's letter dated 5/5/03, added more weeds and added State
Restrictions for California and Oregon via Modification.

(Side Panels)

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

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. When using this product, wear long-sleeved shirt, long pants, socks, shoes, and rubber gloves. 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. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried. The maximum number of broadcast applications per treatment site is 2 per year.

If this container is over one gallon and less than five gallons, then persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) 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.

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, 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. Do not apply this product through any type of irrigation system.

Most cases of ground water contamination involving herbicides such as 2,4-D and Clopyralid have been associated with mixing/loading and disposal sites. Additionally, using Clopyralid where soils are permeable, particularly where the water table is shallow, may also result in leaching to groundwater. Caution should be exercised when handling this product at mixing, loading and disposal 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 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.

XRM-5202 PREMIUM LAWN WEED KILLER is a broad-spectrum herbicide for control of actively growing annual and perennial broadleaf weeds. It is for use on established Non-Residential, Ornamental Turf Lawns (Industrial and Institutional), Athletic/Recreational Fields (Parks, Playgrounds and Sports Fields), Cemeteries, Golf Courses (Fairways, Aprons, and Roughs), Industrial Sites, Non-Cropland, Rights-Of-Way and Roadsides, except as noted on the front cover. Do not use on Golf Greens nor Tees.

Do not use on residential turf. Do not collect grass clippings for mulch or compost. Do not send clippings to a compost facility. Applicator must give notice to landowners/property managers to not use grass clippings for mulching or composting.

XRM-5202 may be applied to the following established turfgrass species:

Established Turfgrasses (Common Names)**Northern Grasses (Cool Season)**

bentgrass†
bluegrass, Kentucky
fescue, chewing
fescue, creeping red
fescue, sheeps
fescue, tall
ryegrass, perennial

Southern Grasses†† (Warm Season††)

bahiagrass†
bermudagrass†
buffalograss
centipedegrass†
zoysiagrass†
zoysiagrass†
fescue, tall (growing in warm season areas)

†Do not apply to these turfgrass species unless potential turfgrass injury can be tolerated. Also, when treating these turfgrass species, do not apply more than 4 ozs. per 1000 sq. ft. To minimize grass injury, a second application should be made at least four weeks later. Avoid swath overlaps.

††Do not treat warm season turfgrass with XRM-5202 Premium Lawn Weed Killer when mowing height is less than 1/2 inch.

Note: XRM-5202 Premium Lawn Weed Killer may discolor and/or stunt turf that is not well-established or is stressed or weakened due to unfavorable climatic conditions, temperature extremes, drought, nematodes, or other factors which damage or weaken turf. Apply this product only to healthy, well-established turf that has a well-anchored root system. Do not apply this product to grass species not listed on this label unless potential turf injury can be tolerated.

USE PRECAUTIONS

Do not apply this product directly to, or otherwise permit drift or spray mist to come into contact with cotton, citrus, grapes, tobacco, vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Avoid fine mists. Use lawn type sprayer with coarse spray as wind drift is less likely. Spray drift can be reduced by spraying when wind speed is low and keeping spray boom as low as possible. Very small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants near enough to be injured. Do not pour spray solutions near desirable plants. Do not apply to exposed roots of shallow rooted trees and shrubs. Do not use grass clippings from turf treated with this product for mulch or compost. Mow newly seeded turf at least twice before treatment with XRM-5202. Maximum kill (or control) of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. Unless noted elsewhere on this label, do not apply more than 5.25 ozs. per 1,000 sq. ft. per application. Do not exceed recommended rates because damage to turf may occur. Do not apply when temperature exceeds 90°F.

For optimum results: (1) avoid applying during excessively dry or hot periods unless

irrigation is used; (2) avoid applying if rainfall is expected within 18 hours, nor should lawns be irrigated (watered) for 18 hours following application period. Watering will wash off weed killing material; (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.

WEEDS CONTROLLED BY XRM-5202 PREMIUM LAWN WEED KILLER

This product is designed to control many broadleaf weeds such as: Alder, Annual yellow sweet clover, Artichoke, Aster, Austrian fieldcress, Bedstraw, Beggartick, Bidden, Bindweed, Bird vetch, Bitterweed, Bitter wintercress, Black-eyed Susan, Black medic, Black mustard, Blackseed plantain, Blackseed plantain, Blessed thistle, Blue lettuce, Blue vervain, Box elder, Bracted plantain, Brassbuttons, Bristly oxtongue, Broadleaf dock, Broadleaf plantain, Broomweed, Buckhorn, Buckhorn plantain, Bulbous buttercup, Bull nettle, Bull thistle, Burdock, Burning nettle, Bur ragweed, Burweed, Buttercup, Canada thistle, Carolina geranium, Carpetweed, Catchweed bedstraw, Catsear, Catnip, Chickweed, Chicory, Cinquefoil, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common chickweed, Common mullein, Common sowthistle, Corn Chamomile, Creeping jenny, Crimson clover, Croton, Cudweed, Curly dock, Curly indigo, Dandelion, Dead nettle, Dock, Dogbane, Dogfennel, Elderberry, English daisy, Fall dandelion, False dandelion, False flax, False sunflower, Fiddleneck, Field bindweed, Field pansy, Flea bane (daisy), Flixweed, Florida betony, Florida pusley, Frenchweed, Galinsoga, Garlic mustard, Goathead, Goatsbeard, Goldenrod, Ground ivy, Gumweed, Hairy bittercress, Hairy fleabane, Hawkweed, Healall, Heartleaf drymary, Hedge bindweed, Hedge mustard, Hemp, Henbit, Hoary cress, Hoary plantain, Hoary vervain, Honeysuckle, Hop clover, Horsenettle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knawel, Knotweed, Lambsquarter, Lespedeza, Locoweed, Lupine, Mallow, Marshelder, Matchweed, Mexicanweed, Milk vetch, Milkweed bloodflower, Mugwort, Morningglory, Mousear chickweed, Musk thistle, Mustard, Narrowleaf plantain, Narrowleaf vetch, Nettle, Orange hawkweed, Oxalis, Oxeye daisy, Parsley-piert, Parsnip, Pearlwort, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Pineywoods bedstraw, Plains coreopsis, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prairie, Prickly lettuce, Prickly sida, Primrose, Prostrate knotweed, Prostrate pigweed, Prostrate spurge, Prostrate vervain, Puncture vine, Purslane, Ragweed, Red clover, Redroot pigweed, Red sorrel, Redstem filaree, Rough cinquefoil, Rough fleabane, Roundleafed marigold, Rush, Russian pigweed, Russian thistle, St. Johnswort, Scarlet pimpernel, Scotch thistle, Sheep sorrel, Shepherdspurge, Slender plantain, Smallflower galinsoga, Smartweed, Smooth dock, Smooth pigweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spiny, Spiny Amaranth, Spiny cocklebur, Spotted catsear, Spotted knapweed, Spotted spurge, Spurge, Spurweed, Stinging nettle, Stinkweed, Stitchwort, Strawberry clover, Sumac, Sunflower, Sweet clover, Tall nettle, Tall vervain, Tansy mustard, Tansy ragwort, Tanweed, Tarweed, Thistle, Tick trefoil, Toadflax, Trailing Crownvetch, Tumble mustard, Tumble pigweed, Tumbleweed, Velvet leaf, Venice mallow, Veronica, Vervain, Vetch, Virginia buttonweed, Virginia creeper, Virginia pepperweed, Wavyleaf bullthistle, Western clematis, Western salsify, White clover, White mustard, Wild mustard, Wild aster, Wild buckwheat, Wild carrot, Wild four-o'clock, Wild garlic, Wild geranium, Wild lettuce, Wild marigold, Wild onion, Wild parsnip, Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Wild vetch, Willow, Witchweed, Woolly morningglory, Woodsorrel, Woolly croton, Woolly plantain, Wormseed, Yarrow, Yellow rocket, Yellowflower pepperweed, and other broadleaf weeds.

After applying this product, many broadleaf weeds will begin to show visible signs of leaf curl within a few days. Some hard-to-kill (or control) broadleaf weeds may require a second broadcast treatment in 3 to 4 weeks. In the event more than two broadcast applications per year are necessary, use as a spot treatment. Spot treat with ready-to-use XRM-5202 Premium Spot Weed Killer or make up solution as listed below.

TURF APPLICATION DIRECTIONS

Make application using equipment that will ensure uniform coverage such as hose-end sprayer, tank-type pump-up pressure sprayer, or sprinkling can. Broadleaf weeds germinate at different times of the year. Only emerged weeds present at the time of application will be killed (or controlled) by XRM-5202 Premium Lawn Weed Killer. Spray entire lawn, wetting weeds and lawn grasses. Be sure the lawn is well watered. If dry, water 1 to 2 days before applying this product. Application under drought conditions may provide less than desirable results. When hard-to-kill (or control) species are prevalent, when applications are made in late Summer, when weeds are mature, or during drought conditions,

use the higher rates. Measure the area to be treated. Multiply the length by the width to calculate the square feet.

Cool Season Grasses - Listed above: use 3.2 to 5.25 ounces of this product in 5 gallons of water to 1,000 square feet of lawn. For smaller areas - use 3 teaspoons in 2 quarts of water applied to 100 square feet.

Warm Season Grasses - Listed above: use 3.2 to 4 ounces in 5 gallons of water to treat 1,000 square feet (3 teaspoonfuls in 4 quarts of water applied to 150 square feet). If slight turf yellowing occurs, it should disappear after about 1 week.

Note: Some hybrid Bermuda grasses may be sensitive to this product. Contact your local Extension Service Weed Control Specialist.

For Refill of Riverdale's Spot Weed Killer: Put 2.8 ounces of XRM-5202 Premium 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: Always store pesticides in a secured warehouse or storage building. Store at temperatures above 32°F. If allowed to freeze, shake well before using. 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 store near open containers of fertilizer, seed or other pesticides. Do not contaminate water, food or feed by storage or disposal.

PRODUCT DISPOSAL: Pesticide wastes are toxic. 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 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. Plastic containers are also disposable by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Seller warrants that this herbicide conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this herbicide is reasonably fit for its intended purposes. Since timing, method of application, weather, plant and soil conditions, mixtures with other chemicals, and factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use, including the use of this product on turf species not recommended on this label.

(RV 101003)

Optional Marketing Statements

Water Based
Outdoor Use Only
For Both Cool Season & Warm Season Grasses

Editor's Note:

The State Sale and Use Prohibitions of this product must be part of printed label text for any product which might possibly enter the channels of trade in the states of California, Oregon and/or Washington. The label prohibitions are optional for all other states.