



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

JUN 3 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: Label Revisions
Riverdale XRM-5202 Premium Granular Weed Killer
EPA Registration Number 228-341
Your Submission Dated April 18, 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. Based on our meeting of May 28, 2003, make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. On the "Residential" labeling modify the Environmental Hazards statement to read as follows:

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

b. On the "Residential" labeling delete "Golf Courses (Fairways, Aprons, Tees and Roughs)", "Parks" and "Cemeteries" and "similar non-crop areas". The intended use site should be specified as "Lawns" or "Ornamental Turf Lawns".

c. On the "Commercial" labeling delete "such as" and specify "and similar ornamental turf areas" or add the following WPS Exclusionary statement:

Not for use on turf being grown for sale or other commercial use such as sod, or for commercial seed production, or for research purposes.

d. When this product is formulated with a Clopyralid Technical marketed with the labeling approved by this office on September 27, 2002 (or later) you must modify the turf directions for use to include the following statements :

2 7 10

-2-

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

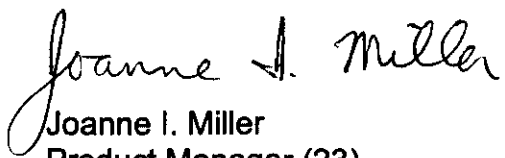
- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

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,



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

Enclosure

3710

(Non-Commercial Label)

*Extra Copy
with Huesca new
changes*

RIVERDALE®

XRM-5202™ PREMIUM GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE WHICH
KILLS (OR CONTROLS) A WIDE SPECTRUM OF BROADLEAF WEEDS.

CONTAINS 2,4-D, TRICLOPYR, AND CLOPYRALID.

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

Treats (or covers) 5,000 Square Feet (50' x 100')

ACTIVE INGREDIENTS:

Triisopropanolamine Salt of 2,4-D*	2.139%
Triethylamine Salt of Triclopyr**	0.159%
Clopyralid Acid***	0.057%
INERT ¹ INGREDIENTS	97.645%
TOTAL	100.000%

By Isomer Specific AOAC Method, Equivalent to:

*2,4-D Acid	1.147%
**Triclopyr Acid	0.114%
***Clopyralid Acid	0.057%

Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-341

NET WEIGHT 20 LBS.

EPA EST. NO. 228-IL-1

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

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUN 3 2003**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
228-341**

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

Causes moderate eye irritation. Avoid contact with eyes or clothing. When using this product, wear long pants, long-sleeved shirt, socks and shoes. 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.

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.

Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions contaminate groundwater which may be used for irrigation or drinking purposes. Users are advised not to apply clopyralid where soils have a rapid to very rapid permeability throughout the profile (such as loamy sand to sand) and the water table of an underlying aquifer is shallow, or to soils that would allow direct introduction into an aquifer. Your local agricultural agencies can provide further information on the type of soil in your area and the location of groundwater.

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 GRANULAR WEED KILLER is a stable mixture of three broad-spectrum herbicides. It is for use on Ornamental Turf such as Lawns, Parks, Cemeteries, and Golf Courses (Fairways, Aprons, and Roughs) and similar non-crop areas.

This product may be used on established Bahia, Bent* (excluding golf course greens and tees), common Bermuda*, Blue Grass, Buffalo, Centipede*, Fescue, Rye, and Zoysia* grass. **DO NOT USE** on Centipede, Dichondra, St. Augustine, 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.

*Do not apply to these turfgrasses unless potential turf injury can be tolerated. To minimize grass injury, an additional application should be made no sooner than four weeks later. Avoid overlapping.

This product is designed to kill (or control) many broadleaf weeds such as: Acacia, Alder, Artichoke, Aster, Austrian fieldcress, Bachelor button, Beggartick, Bidens, Birdweed, Bitterweed, Bitter wintercress, Black medic, Blessed thistle, Blue lettuce, Box elder, Broomweed, Buckhorn, Buckwheat, Buffalobur, Bull thistle, Burdock, Bur ragweed, Buttercup, Canada thistle, Carpetweed, Catnip, Chamomile, Chickweed, Chicory, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common sowthistle, Cornflower, Creeping jenny, Croton, Curly indigo, Dandelion, Dock, Dogbane, Dog fennel, Elderberry, Fanweed, Flea bane (daisy), Flixweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Groundsel, Gumweed, Hawksbeard, Hawkweed, Healall, Hemp, Henbit, Hoary cress, Honeysuckle, Horsetail, Horseweed, Indiana mallow, Ironweed, Jewelweed, Jimsonweed,

Kochia, Knapweed, Knotweed, Kudzu, Ladysthumb, Lambsquarter, Lespedeza, Locoweed, Lupine, Mallow, Marshelder, Meadow salsify, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nightshade,, 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, Shepherdspurse, Sicklepod Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spurge, Starthistle, Stinkweed, Sumac, Sunflower, Sweet clover, Tansy Ragwort, Tarweed, Teasel, Thistle, Toadflax, Tumbleweed, Velvet leaf, Veronica, Vervain, Vetch, Virginia creeper, Wild aster, Wild carrot, Wild geranium, Wild lettuce, , Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Willow, Witchweed, 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 listed Warm Season Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration. 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 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 also acceptable.

The following settings are approximate for applying contents of this package at a suggested rate of 4 pounds 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 lb. 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

Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

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

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 fertilizer, seed or other pesticides.

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 041803)

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 XRM-5202™ - A Premium Selective Herbicide

For Both Cool Season & Warm Season Grasses

Alternate Statements

¹OTHER*

*Please note, some states may still require the term INERT and/or the full chemical name of the Active Ingredients.

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

*Note: Spreader Settings will vary among various commercial spreader manufacturers.

7 7 10

(Commercial Label)

RIVERDALE®

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CONTAINS 2,4-D, TRICLOPYR, AND CLOPYRALID.

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

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Triethylamine Salt of 3,5,6-Trichloro-2-Pyridinyloxyacetic Acid**	0.159%
3,6-Dichloro-2-Pyridinecarboxylic Acid***	0.057%
INERT INGREDIENTS:	97.645%
TOTAL	100.000%

By Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	1.147%
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EPA REG. NO. 228-341

NET WEIGHT 20 LBS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY NUFARM AMERICAS, INC., BURR RIDGE, ILLINOIS 60527-0355

ACCEPTED with COMMENTS In EPA Letter Dated: JUN 3 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 228-341

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Clopyralid, an active ingredient in this product, may leach through soil into groundwater under certain conditions of use. Use of this product where soils are permeable, particularly where the water table is shallow, may 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 or transferring this product will reduce the probability of spills. Placement of mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

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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.

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- ✓ Traps Dust, Smoke Particles & other Pollutants
- ✓ Purifies 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 stack 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.

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 041803)

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.

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