

228-344

09/19/2008

1/8



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 19 2008

George Meindl
Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

Dear Mr. Meindl:

Subject: Label Amendment for RED: 2,4-D, and Dicamba
Riverdale Millennium Ultra Granular Weed Killer
EPA Registration Number 228-344

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:

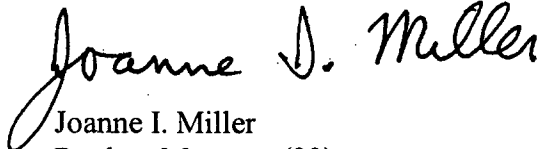
1. The text "Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using the product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water" appearing in the section entitled Hazard to Humans and Domestic Animals is either incomplete or duplicated elsewhere on the label and should be deleted.
2. Per the combined 2,4-D/Dicamba label table, "chemical-resistant gloves made of any waterproof material" must be added to the handler PPE section.
3. It is unclear whether this product is intended for sod farm use. The label must either be revised to include exclusionary text such as "Not for use on turf grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes" or include an Agricultural Use Requirements box that lists an REI of 48 hours and early entry PPE (coveralls worn over short-sleeve shirt and short pants, chemical-resistant footwear plus socks, chemical-resistant gloves made of any waterproof material, chemical-resistant headgear for overhead exposure and protective eyewear.")
4. The text "Do not allow people (other than the applicator) or pets on treatment area during application. Do not enter treatment areas until dust has settled" and "The maximum number of broadcast applications per treatment site is 2 per year" should be relocated to the Directions for Use.

- 5. The following text must be added to the label:

“Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.”
- 6. The directions to apply “4 (or 3.6 for 18 lb Bag) pounds per 1000 square feet” (or 1.99 lb ae of 2,4-D per acre) exceeds the allowable rate of 1.5 lbs of 2,4-D ae per acre per application. The label must be revised.
- 7. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,



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

Enclosure

(Commercial Only Label)

MILLENNIUM ULTRA GRANULAR WEED KILLER

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS ON NON-RESIDENTIAL ORNAMENTAL LAWNS AND TURF GRASSES.

CONTAINS 2,4-D, CLOPYRALID AND DICAMBA

Weeds contacted by this product gradually die and disappear from the lawn.
Treats (or covers) 5,000 Square Feet (50' x 100')

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-D*	1.381%
Clopyralid Acid**	0.142%
Dicamba Acid***	0.142%

OTHER INGREDIENTS:	<u>98.335%</u>
TOTAL:	100.000%

BY ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2,4-D Acid	1.147%
**Clopyralid Acid	0.142%
***Dicamba Acid	0.142%

²IN NEW YORK STATE, THIS PRODUCT MAY ONLY BE SOLD TO AND USED BY PROFESSIONAL APPLICATORS AND IS PROHIBITED FROM SALE AND USE IN NASSAU AND SUFFOLK COUNTIES.
IN CALIFORNIA, OREGON, AND WASHINGTON, TURFGRASS AND LAWN USES ARE RESTRICTED TO GOLF COURSES ONLY.

This product cannot be used on Agricultural, Forest sites or Right-of-way.

KEEP OUT OF REACH OF CHILDREN
CAUTION
SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, call (877) 325-1840

ACCEPTED
with COMMENTS
In EPA Letter Dated:
SEP 19 2008

EPA REG. NO. 228-344
EPA EST. NO. 228-IL-1

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

MANUFACTURED BY
NUFARM AMERICAS INC.
150 HARVESTER DRIVE
BURR RIDGE, IL 60527



228-344

NET WEIGHT 20 LBS.

000228-00344.20080310.EPA.24d.Pending

WEEDS CONTROLLED

This product is designed to control many broadleaf weeds such as:

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

6/8

Commercial

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 (or 18) 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 (or 3.6 for 18 lb. Bag) 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 (.9 for 18 lb. Bag) pound per 250 square feet.

**SPREADER SETTINGS
ONE PASS APPLICATION¹**

<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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE 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.

PRODUCT 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.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

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7/8

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TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV031008R)

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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.

Suggested spreader settings are not intended to replace calibration.

Please calibrate your spreader prior to applying product.

XXX pounds treats XXX square feet at the XXX pounds per acre rate

OPTIONAL MARKETING STATEMENTS

Contains Millennium Ultra - A Premium Selective Herbicide

OPTIONAL MARKETING STATEMENT(S)

For Both Cool Season & Warm Season Grasses

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

¹Note: Spreader Settings will vary among various commercial spreader manufacturers.

EDITOR'S NOTE:

²The 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 New York, California, Oregon and/or Washington. The state label prohibition is optional for all other states.

Special Editor's Note: **REVISED**