



000228-00349-051499

Printed: 13:03:21 Wednesday, 16 Jun, 1999 # 5 / 3247

Systems Integration Group, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

MAY 14 1999

Dear Mr. Sawyer:

Subject: Label Revision Amendment-Revise Precautionary Language
Riverdale MCDA Lawn Weed Killer
EPA Registration No. 228-349
Your correspondence dated December 7, 1998

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 [NOTE: Changes apply to both the Commercial and Non-Commercial labeling]:
 - a. Under the subheading entitled "STATEMENT OF PRACTICAL TREATMENT," please incorporate the following dermal and one of the following oral first aid statements:

"IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting."

-OR-

"IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, or if available by administering syrup of ipecac. If person is unconscious, do not give anything by mouth and do not induce vomiting."

"IF ON SKIN: Wash with plenty of soap and water. Get medical attention."

- b. Under the heading entitled "DIRECTIONS FOR USE," please incorporate the following protective clothing statement in accordance with the Registration

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	MHoward							
DATE ▶	May 13, 1999							

Standard for 2-methyl-4-chlorophenoxyacetic acid (MCPA) and its salts and esters:

"When mixing or applying this pesticide, use of a face shield or goggles are required."

2. Make the following change to your Non-Commercial label:
 - a. Under the subheading entitled "HAZARDS TO HUMANS AND DOMESTIC ANIMALS," revise the third sentence to read as "Avoid contact with eyes, skin or clothing."
3. Please submit one (1) final printed copy for 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

3 of 9

(Commercial)

RIVERDALE

MCDA™ LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL
IN ORNAMENTAL LAWNS AND TURF GRASSES

CONTAINS MCPA, CLOPYRALID AND DICAMBA

KILLS (OR CONTROLS): Dandelion, Chickweed, Black medic, Knotweed, Plantain, Oxalis,
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*	13.47%
Monoethanolamine Salt of 3,6-Dichloro-2-Pyridinecarboxylic Acid**	1.45%
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***	1.32%
INERT INGREDIENTS:	83.76%
TOTAL	100.00%

By Isomer Specific AOAC Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	11.0%	0.950 lbs./gal.
**3,6-Dichloro-2-Pyridinecarboxylic Acid	1.1%	0.095 lbs./gal.
***3,6-Dichloro-o-Anisic Acid	1.1%	0.095 lbs./gal.

†MCDA™ - Is A Trademark of Riverdale Chemical Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

EPA REG. NO. 228-349

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

MAY 14 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-349

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

Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

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.

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

MCDA™ 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. *Excluding Bentgrass Tees.

USE PRECAUTIONS

Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants. Do not use on Centipede, St. Augustine, Dichondra, nor on lawns or turf where desirable clovers are present. Avoid fine mists. Use lawn type sprayer with coarse spray as wind drift is less likely. Avoid contact with exposed feeder roots of ornamentals and trees. Maximum killing (control) of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. The degree of weed control and duration of effect will vary with weed size and density, spray rate and coverage, and growing conditions before, during, and after the time of treatment. 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. Avoid broadcast applications when air temperature exceeds 90°F.

The suitable use of MCDA™ Lawn Weed Killer on non-recommended turf species may be determined by treating a small area at any rate/acre which does not exceed 3 pints/12,000 square feet. 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.

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. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other sprays.

WEEDS CONTROLLED BY MCDA™ LAWN WEED KILLER

Alfalfa, Amaranth, Aster, Bachelor button, Bedstraw, Bedstraw, Beggartick, Beggarweed, Bindweed, Bitter sneezeweed, Black medic, Bladder campton, Bracken fern, Broomweed, Buckhorn, Buckwheat, Buffalobur, 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, Groundsel, Halfshrub sundrop, Hawksbeard, Hawkweed, Healall, Heartleaf drymary, Hemp sesbania, Hempnettle, Henbit, Horsenettle, Horsetweed, Ironweed, Jerusalem artichoke, Jimsonweed, Knapweed, Knapwood, Knawel, Knotweed, Kochia, Ladysthumb, Lambsquarter, Lespedeza, Little starwort, Locoweed, 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, Redvine, Redstem, Rubberweed, Sheep sorrel, Shepherdspurse, sicklepod, Smartweed, Snakeweed, Scowthistle, Speedwell, Spiderwort, Spikeweed, Spiny, Spurge, Spurry, Spurweed, Starbur, Stinging nettle, Stitchwort, Stunkweed, Sumpweed, Sunflower, Tansy ragwort, Teasel, Teaweed, Texas blueweed, Thistle, Toadflax, Trumpet creeper, Velvetleaf, Veronica, Vetch, Waterhemlock, Waterhemp, Whitebrush, Wild radish, Wild aster, Wild carrot, Wild geranium, Wood sorrel, Wormwood, Yankeeweed, Yarrow, Yellow starthistle, Yellow rocket, and many other broadleaf weeds.

Some hard-to-kill (control) weeds may require a second (or additional) broadcast application or repeated spot applications even under ideal conditions for application.

ORNAMENTAL TURF

Apply MCDA™ Lawn Weed Killer at the rate of 2 pints in 4 to 50 gallons of water per 10,000 square feet (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.

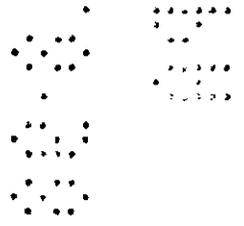
STORAGE AND DISPOSAL

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. (ERP 061594) (PR938 042194)



6 of 9

(Non-Commercial)

RIVERDALE

MCDA™ LAWN WEED KILLER

FOR SELECTIVE BROADLEAF WEED CONTROL
IN ORNAMENTAL LAWNS AND TURF GRASSES

CONTAINS MCPA, CLOPYRALID AND DICAMBA

KILLS (OR CONTROLS): Dandelion, Chickweed, Black medic, Knotweed, Plantain, Oxalis,
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 MCPA*	13.47%
Monoethanolamine Salt of Clopyralid**	1.45%
Dimethylamine Salt of Dicamba***	1.32%
INERT INGREDIENTS:	83.76%
TOTAL	100.00%

By Isomer Specific AOAC Method, Equivalent to:

*MCPA Acid	11.0%	0.950 lbs./gal.
**Clopyralid Acid	1.1%	0.095 lbs./gal.
***Dicamba Acid	1.1%	0.095 lbs./gal.

†MCDA™ - Is A Trademark of Riverdale Chemical Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

EPA REG. NO. 228-349

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

MAY 14 1993

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

228-349

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

Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid contact with eyes or clothing. Wash thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT²

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

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.

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

MCDA™ 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. *Excluding Bentgrass Tees.

USE PRECAUTIONS

Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants. Do not use on Centipede, St. Augustine, Dichondra, nor on lawns or turf where desirable clovers are present. Avoid fine mists. Use lawn type sprayer with coarse spray as wind drift is less likely. Avoid contact with exposed feeder roots of ornamentals and trees. Maximum killing (control) of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. The degree of weed control and duration of effect will vary with weed size and density, spray rate and coverage, and growing conditions before, during, and after the time of treatment. 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. Avoid broadcast applications when air temperature exceeds 90°F.

.....
The suitable use of MCDA™ Lawn Weed Killer on non-recommended turf species may be determined by treating a small area at any rate/acre which does not exceed 3 pints/12,000 square feet. 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 areas.

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

8 7 9

following application; (4) reseed no sooner than 3 to 4 weeks after application of this product. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other sprays.

WEEDS CONTROLLED BY MCDA™ LAWN WEED KILLER

Alfalfa, Amaranth, Aster, Bachelor button, Bedstraw, Beggartick, Beggarweed, Bindweed, Bitter sneezeweed, Black medic, Bladder campton, Bracken fern, Broomweed, Buckhorn, Buckwheat, Buffalobur, 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, Groundsel, Halfshrub sundrop, Hawksbeard, Hawkweed, Healall, Heartleaf drymary, Hemp sesbania, Hempnettle, Henbit, Horsenettle, Horseweed, Ironweed, Jerusalem artichoke, Jimsonweed, Knapweed, Knapwood, Knawel, Knotweed, Kochia, Ladysthumb, Lambsquarter, Lespedeza, Little starwort, Locoweed, 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, Redvine, Redstem, Rubberweed, Sheep sorrel, Shepherdspurse, 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, Toadflax, Trumpetcreeper, Velvetleaf, Veronica, Vetch, Waterhemlock, Waterhemp, Whitebrush, Wild radish, Wild aster, Wild carrot, Wild geranium, Wood sorrel, Wormwood, Yankeeweed, Yarrow, Yellow starthistle, Yellow rocket, and many other broadleaf weeds.

Some hard-to-kill (control) weeds may require a second (or additional) broadcast application or repeated spot applications even under ideal conditions for application.

ORNAMENTAL TURF

Apply MCDA™ Lawn Weed Killer at the rate of 2 pints in 4 to 50 gallons of water per 10,000 square feet (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 square feet. 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 quart disposable bottle. Not to scale.)
6,000 Sq. Ft.	
8,000 Sq. Ft.	
10,000 Sq. Ft.	

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. (ERP 061594)(PR938 042194)

Alternate Statements

Other*

First Aid*

*Please note, some states may still require the terms Inert and/or Statement of Practical Treatment.

