



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

JUN 17 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: Revisions "Commercial" Label
Riverdale MCDA Lawn Weed Killer
EPA Registration Number 228-349
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. 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.

b. 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 :

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.

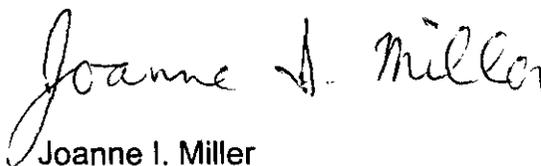
- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

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. Please note that we did not review the "Non-Commercial" label since this is equivalent to a residential label and clopyralid technical is no longer registered for residential use.

Sincerely yours,



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

Enclosure

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(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 ¹ 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 - A Nufarm Company
Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-349

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

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

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUN 17 2003

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. When mixing or applying this pesticide, use of a face shield or goggles are required. If using the disposable sprayer and bottle, wear eye protection when refilling the bottle or when connecting or disconnecting bottle from sprayer. Mixers/loaders or applicators are required to use a face shield or goggles.

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. 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, 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, Sowthistle, 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. 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 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, 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. (RV 041803)