

228-353

6/5/2003

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copy



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Russell F. Sawyer
Nufarm Americas Inc.
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60521-0866

JUN 5 2003

Dear Mr. Sawyer:

Subject: Revisions "Commercial" Label
Riverdale MCDA Granular Weed Killer
EPA Registration Number 228-353
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.

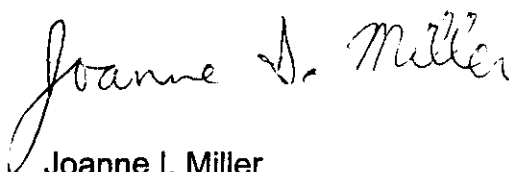
- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

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

(Commercial Label)

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RIVERDALE®

MCDA™ GRANULAR WEED KILLER

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

CONTAINS MCPA, 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-Methyl-4-Chlorophenoxyacetic Acid*	1.300%
Monoethanolamine Salt of 3,6-Dichloro-2-Pyridinecarboxylic Acid**	0.140%
Dimethylamine Salt of Dicamba(3,6-Dichloro-o-Anisic Acid)***	0.128%
INERT INGREDIENTS:	98.432%
TOTAL	100.000%

By Isomer Specific AOAC Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	1.061%
**3,6-Dichloro-2-Pyridinecarboxylic Acid	0.106%
***3,6-Dichloro-o-Anisic Acid	0.106%

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 BACK PANEL FOR FIRST AID
AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-353

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 5 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-353

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. Wash thoroughly with soap and water after handling.

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.

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.

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 GRANULAR 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.

Do not use on Centipede, Dichondra, and St. Augustine. 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 when air temperature exceeds 90°F. Avoid overlapping.

This product is designed to kill (or control) many broadleaf weeds such as Alfalfa, Amaranth, Aster, Bachelor button, Beadstraw, Bedstraw, Beggartick, Beggarweed, Bindweed, Bitter sneezeweed, Black medic, Bladder campion, 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, Redevine, 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 garlic, Wild geranium, Wood sorrel, Wormwood, Yankeeweed, Yarrow, Yellow starthistle, Yellow rocket, and many 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 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 pound 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

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: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near open containers of fertilizer, seed, or other pesticides. 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: 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.
- (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 MCPA - A Premium Selective Herbicide

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

Note: Spreader Settings will vary among various commercial manufacturers.

Optional Marketing Statement(s)

For Both Cool Season & Warm Season Grasses