

228-371

8/20/2003

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

AUG 20 2003

Russell F. Sawyer  
Riverdale Chemical Company  
1333 Burr Ridge Parkway, Suite 125A  
Burr Ridge, IL 60527-0866

Dear Mr. Sawyer:

Subject: Label Revisions  
Riverdale MTCA Premium Selective Herbicide  
EPA Registration Number 228-371 ✓  
Your Letter Dated June 25, 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. 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.

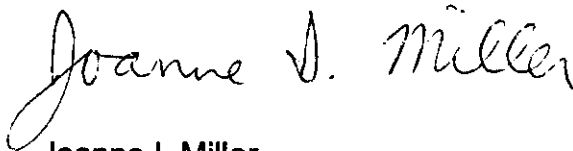
2. On page 2 above Precautionary Statements is the statement "Inside Booklet". 40 CFR 156.10(a)(2)(i) states that all words, statements, graphic representations, designs or other information required on the labeling by the Act or the regulations must be clearly legible to a person with normal vision and must be placed with such conspicuousness and expressed in such terms to render it likely to be read and understood by ordinary individual under customary conditions of purchase and use. 40 CFR 156.10(i)(1)(ii) states that only the directions for use may appear on printed or graphic matter which accompanies the pesticide. When preparing final printed labeling assure that the first aid and precautionary statements and other required text appear on the container label or otherwise can be read during purchase or formally submit a request for a size exemption from the regulations.

3. 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

PLEASE SEE SPECIAL EDITOR'S NOTE ON LAST PAGE

RIVERDALE®

MTCA PREMIUM SELECTIVE HERBICIDE

FOR THE CONTROL OF ANNUAL AND PERENNIAL BROADLEAF WEEDS IN ORNAMENTAL TURF INCLUDING SOD FARMS

CONTAINS MCPA, TRICLOPYR, AND CLOPYRALID

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.

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	37.9%
Triethylamine Salt of 3,5,6-Trichloro-2-Pyridinyloxyacetic Acid**	3.8%
3,6-Dichloro-2-Pyridinecarboxylic Acid***	1.3%
INERT INGREDIENTS:	57.0%
TOTAL	100.0%

By Isomer Specific AOAC Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	31.0%	3.00 lbs./gal.
**3,5,6-Trichloro-2-Pyridinyloxyacetic Acid	2.7%	0.27 lbs./gal.
***3,6-Dichloro-2-Pyridinecarboxylic Acid	1.3%	0.13 lbs./gal.

Riverdale is a Registered Trademark of Riverdale - A Nufarm Company

For Use By Professional Turf Maintenance Personnel, Landscaping or Commercial Applicators Only.

NOT FOR SALE OR USE IN NASSAU AND SUFFOLK COUNTIES IN N.Y. STATE IN WASHINGTON, THIS PRODUCT MAY NOT BE USED ON RESIDENTIAL LAWNS¹.

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-371

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

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

Revised 4/18/03 Changed First Aid Statement per PR 2001-1 via Amendment.  
6/25/03 Corrected Ornamental Sites per EPA's Request 5/28/03 Meeting. Also added Special Editor's Note.

(Inside Booklet)

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER - PELIGRO**

Corrosive. Causes irreversible eye damage. Harmful if swallowed, or absorbed through skin. Do not get in eyes or clothing. Wash thoroughly with soap and water after handling.

**NON-WPS TURF USE:** Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170)--in general only agricultural plant uses are covered by the WPS--must wear eye protection (goggles, face shield, or safety glasses) when using this product. It is recommended that safety glasses include front, brow, and temple protection.

**WPS SOD FARM USES:** Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170)--in general, agricultural plant uses are covered--must wear: Long-sleeved shirt and long pants, waterproof gloves, shoes plus socks, and protective eyewear. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**ENGINEERING CONTROL STATEMENTS:** If the mechanical system is used in a manner that meets the requirements listed in the worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

**USER SAFETY RECOMMENDATIONS**

**USERS SHOULD:** Wash hands, face, and arms with soap and water before eating, smoking, drinking, or using the toilet. Wash the outside of gloves before removing.

**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.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate use of gastric lavage.

**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. Do not apply this product through any type of irrigation system.

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.**

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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI of 48 hours.)

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: Coveralls, waterproof gloves, shoes plus socks, and protective eyewear.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

**AUG 20 2003**

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

228-371

**NON-AGRICULTURAL USE REQUIREMENTS**

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

MTCA PREMIUM SELECTIVE HERBICIDE is a broad-spectrum herbicide for control of actively growing annual and perennial broadleaf weeds. It is for use on established Ornamental Turf Lawns (Residential, Industrial and Institutional), Parks, Cemeteries, Athletic Fields, Roadsides and Golf Courses (Fairways, Aprons, Tees and Roughs) and similar turf areas; also for use on sod farms. Do not use on Golf Greens or Tees.

In New York State: Do not apply more than 17.2 pints (0.28 pounds of clopyralid acid) Riverdale MTCA Premium Selective Herbicide per acre per year.

MTCA may be applied to the following established turfgrass species:

**Established Cool Season Turfgrasses**

<b>Common Name</b>	<b>Scientific Name</b>
Bentgrass	<i>Agrostis species</i>
Bluegrass, Kentucky	<i>Poa pratensis</i>
Fescue, chewing	<i>Festuca rubra</i> var. <i>commutata</i>
Fescue, creeping red	<i>Festuca rubra</i>
Fescue, sheeps	<i>Festuca ovina</i>
Fescue, tall	<i>Festuca arundinaceae</i>
Ryegrass, perennial	<i>Lolium perenne</i>

**Established Warm Season Turfgrasses†**

<b>Common Name</b>	<b>Scientific Name</b>
Bahiagrass	<i>Paspalum notatum</i>
Bermudagrass	<i>Cynodon dactylon</i>
Buffalograss	<i>Buchloe dactyloides</i>
Centipedegrass	<i>Eremochloa ophiuroides</i>
Zoysiagrass	<i>Zoysia japonica</i>
Zoysiagrass	<i>Zoysia tenuifolia</i>
Fescue, tall (growing in warm season areas)	<i>Festuca arundinaceae</i>

†Do not treat warm season turfgrass with MTCA when mowing height is less than 1/2 inch.

**Note:** MTCA may discolor and/or stunt turf that is not well-established or is stressed or weakened due to unfavorable climatic conditions, temperature extremes, drought, nematodes, or other factors which damage or weaken turf. Apply this product only to healthy, well-established turf that has a well-anchored root system. Do not apply this product to grass species not listed on this label unless potential turf injury can be tolerated.

**USE PRECAUTIONS**

Do not apply this product directly to, or otherwise permit drift or spray mist to come into contact with cotton, citrus, grapes, tobacco, vegetables, flowers, ornamental plants, shrubs, trees, and other desirable plants. Do not pour spray solutions near desirable plants. Avoid fine mists. Use lawn type sprayer with coarse spray as wind drift is less likely. Spray drift can be reduced by spraying when wind velocity is low, keeping spray boom as low as possible, using nozzles that deliver larger spray droplets and minimize the production of fine spray particles, and by using higher spray volumes and lower pressures. Applications should be made only when hazards from spray drift are at a minimum. Very

small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants near enough to be injured. Do not apply to exposed roots of shallow rooted trees and shrubs. Do not use grass clippings from turf treated with this product for mulch or compost. Maximum kill of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. Do not apply more than 4 pints per acre per application. Mow newly seeded turf at least twice before treatment with MTCA.

For optimum results: (1) Add a spray adjuvant, such as DYNE-AMIC for best results; (2) Use a water conditioning agent, such as, QUEST for high PH and water hardness; (3) Avoid applying during excessively dry or hot periods unless irrigation is used; (4) Turf should not be mowed 1 to 2 days before and following application; (5) reseed no sooner than 3 to 4 weeks after application of this product.

#### WEEDS CONTROLLED BY MTCA PREMIUM SELECTIVE HERBICIDE

This product is designed to promote lush green growth in lawns and control many broadleaf weeds such as: Acacia, Alder, Alfalfa, Arrowhead, Artichoke, Aster, Austrian fieldcress, Bachelor button, Beggarweed, Beggartick, Bidden, Bindweed, Bitterweed, Bitter wintercress, Black medic, Blessed thistle, Blue lettuce, Box elder, Broomweed, Buckhorn, Buckwheat, Buffalobur, Bull thistle, Burcucumber, Burdock, Bur ragweed, Buttercup, Canada thistle, Carpetweed, Catnip, Catsear, Chamomile, Chickweed, Chicory, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common sowthistle, Cornflower, Creeping jenny, Croton, Curly indigo, Daisy, Dandelion, Dock, Dogbane, Dog fennel, Dragonhead Mint, Elderberry, Fanweed, Fat hen, Flea bane, Flixweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goatweed, Goldenrod, Ground ivy, Groundsel, Gumweed, Halbertleaved saltbush, Hawksbeard, Hawkweed, Healall, Hemp, Henbit, Hoary cress, Honeysuckle, Hop Clover, Horsetail, Horsetweed, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knapweed, Knotweed, Kudzu, Ladysthumb, Lambsquarter, Lespedeza, Locoweed, Lupine, Mallow, Marshelder, Matchweed, Meadow salsify, Mexicanweed, Morningglory, Musk thistle, Mustard, Nettle, Nightshade, Nutgrass, 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, Queen Annes lace, Ragweed, Red clover, Red root, Red stem, Red sorrel, Rush, Russian thistle, St. Johnswort, Shepherdspurse, Sicklepod, Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spurge, Spurwood, Starthistle, Stinging nettle, Stinkweed, Sumac, Sunflower, Sweet clover, Tansy Ragwort, Tarweed, Teasel, Thistle, Thornapple, Toadflax, Tree-of-heaven Tumbleweed, Velvet leaf, Veronica, Vervain, Vetch, Virginia creeper, Virginia pepperweed, Whitebrush, White clover, Whitetop, Wild aster, Wild carrot, Wild geranium, Wild gooseberry, Wild jute, Wild lettuce, Wild marigold, Wild petunia, Wild radish, Wild rape, Wild sage, Wild strawberry, Wild sweet potato, Wild violet, Willow, Witchweed, Wormseed, Yarrow, Yellow rocket, and other broadleaf weeds.

After applying this product, many broadleaf weeds will begin to show visible signs of leaf curl within a few days. Some hard-to-control broadleaf weeds may require a second broadcast treatment in 3 to 4 weeks.

#### TURF APPLICATION DIRECTIONS

Apply 3 to 4 pints of MTCA per acre (1.1 to 1.5 ozs./1,000 sq.ft.) to control above listed broadleaf weeds.

The maximum use rate for most warm season grasses is 3 pints per acre.

Make application using equipment that will ensure uniform coverage (see specific application directions below). Foliar sprays should be applied during warm weather when weeds are actively growing. Application under drought conditions may provide less than desirable results. When hard-to-control species are prevalent, when applications are made in late Summer, when weeds are mature, or during drought conditions, use the higher rates.

On closely mowed golf course fairway bentgrass, apply this product at a maximum rate of 2 pints in 20 to 240 gallons of water per acre (0.73 fluid ounces in 0.5 to 5.5 gallons of water per 1000 square feet). During conditions which promote turf stress use lower rates, 1 to 1-1/2 pints in 20 to 240 gallons of water, per acre (0.36 to 0.55 fluid ounces in 0.3 to 5.5 gallons per 1000 square feet). Slight turf yellowing will disappear after one week. To minimize grass injury, a second application should not be made for at least 4

weeks. Avoid swath overlaps. Do not use on golf course greens or tees.

**Note:** Broadleaf weeds germinate at different times of the year. Only emerged weeds present at the time of application will be controlled by MTCA.

**Standard Volume Broadcast Applications:** Apply 3 to 4 pints of MTCA in enough water to deliver 20 to 200 gallons of total spray mix per acre (0.5 to 5 gallons spray per 1,000 square feet). Higher application volumes may be used when this product is tank mixed with liquid fertilizers.

**Low Volume Broadcast Applications:** Apply 3 to 4 pints of MTCA in enough water to deliver from 5 to 40 gallons of total spray mixture per acre. Use low pressures and application equipment capable of delivering a uniform droplet size that can wet the weed leaf surface.

**Targeted Zone Applications or Spot Treatment Using Portable Sprayers:** Mix 0.5 to 1.0 ounces of MTCA in enough water to make one gallon of spray and apply at any time broadleaf weeds are actively growing. Target plants should be sprayed to wet but not beyond point of runoff.

**Herbi™ Controlled Droplet Applicator:** Add 2-1/4 to 3 pints of MTCA to the 5 pint Herbi bottle, then fill with water to make 5 pints of mixture or substitute 1/2 pint of a surfactant for water while agitating the solution. While walking at approximately 1 pace (3 feet) per second, spray entire contents over 33,000 square feet (3/4 of an acre). Do not overlap (double coverage) at edge of spray patterns. Reduced rates (use 1/2 of rate shown above) of MTCA must be applied when grass is stressed from heat, drought, etc. Herbi™ is a trademark of North American Micron.

**Controlled Droplet Applicators - (CDA), Atomizers, and Spinning Disk Applicators:** Use MTCA at the rate of 3 to 4 pints per acre (1.1 to 1.5 fluid ounces per 1,000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment).

Note: Follow CDA equipment spray instructions.

#### STORAGE AND DISPOSAL

**STORAGE:** Always store pesticides in a secured warehouse or storage building. Store at temperatures above 28°F or agitate before using. 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.

**PRODUCT DISPOSAL:** Pesticide wastes are acutely hazardous. 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 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 FOR NON-REFILLABLE CONTAINERS:** 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.

**CONTAINER DISPOSAL FOR REFILLABLE CONTAINERS:** Close all openings which have been opened during use and replace all caps. Contact Riverdale Chemical's Customer Service Department at 1-708/754-3330, to arrange for return of the empty refillable container.



**WARRANTY**

Seller warrants that this herbicide conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this herbicide is reasonably fit for its intended purposes. Since timing, method of application, weather, plant and soil conditions, mixtures with other chemicals, and factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions or under conditions which are abnormal or not reasonably foreseeable. The user assumes all risks of any such use, including the use of this product on turf species not recommended on this label.

(RV 062503)

**Editor's Note:**

<sup>1</sup>The 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, and/or Washington. The label prohibitions are optional for all other states.

**Special Editor's Note:**

Not to appear on final printed label.

The approved use of this label will automatically be terminated once the Clopyralid Technical, (Labeling approved by The Office of Pesticide Programs (OPP) prior to September 27, 2002) is depleted. Please Note; Clopyralid Technical marketed with labeling approved by OPP on September 27, 2002 (or later) prohibits formulating that Clopyralid Technical for use on residential turf. We will provide the Agency with updated labeling based on the new technical label before packaging. Any questions regarding these statements must be directed to Riverdale's Regulatory Affairs Manager at 1-800/345-3330.