

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

AUG 2 8 2002

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Russell F. Sawyer Riverdale Chemical Company 1333 Burr Ridge Parkway, Suite 125A Burr Ridge, IL 60521-0866

Dear Mr. Sawyer:

Subject:

State Clopyralid Restriction

Riverdale DCDP Selective Herbicide EPA Registration Number 228-374 Your Submission Dated July 23, 2002

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. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - Add "Do not use grass clippings from turf treated with this product for composting and/or mulch in the growing season of application".

A stamped copy of the label is enclosed for your records. The amended labeling supersedes previously accepted ones.

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

....

RIVERDALE

DCDP™ Selective Herbicide

A THREE-WAY POST-EMERGENT SELECTIVE BROADLEAF HERBICIDE CONTAINING THE AMINES OF 2,4-D, CLOPYRALID AND DICHLORPROP-p.

GET THE OPTICAL ADVANTAGE™

FOR USE ON GOLF COURSES, PARKS, HIGHWAYS, ORNAMENTAL TURF LAWNS AND SIMILAR NON-CROP AREAS. ALSO FOR USE ON SOD FARMS. KILLS DANDELIONS, CHICKWEEDS, PLANTAINS, OXALIS, SPURGE AND MANY OTHER BROADLEAF WEEDS, SOME OF WHICH ARE LISTED ON THIS LABEL.

ACTIVE INGREDIENTS: Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid*	98% 29% 61%
Isomer Specific AOAC Method, Equivalent to: *2,4-Dichlorophenoxyacetic Acid	jal.

DCDP is a Trademark of Riverdale Chemical Co. GET THE OPTICAL ADVANTAGE is a Trademark of Riverdale Chemical Co.

For Use By Professional Turf Maintenance Personnel, Landscaping or Commercial Applicators Only. NOT FOR SALE TO OR USE BY HOMEOWNERS

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

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 ADDITIONAL PRECAUTIONARY STATEMENTS
AND STATEMENT OF PRACTICAL TREATMENT

GALS. EPA REG. NO. 228-374 NET CONTENTS GALS.

NOTE: Spanish language is optional.

with COMMENTS
In EPA Letter Dated:
AUG 2 8 2002

RIVERDALE CHEMICAL COMPANY
BURR RIDGE, ILLINOIS 60527-0866

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

(Inside Booklet)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER - PELIGRO

Corrosive. This concentrate causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin or on clothing. If this container is over one gallon and less than five gallons, then persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

NON-WPS TURF USES: 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 face shield, goggles, or safety glasses and long pants, long-sleeved shirt, socks, shoes and chemical-resistant gloves when mixing, loading or applying this product. It is recommended that safety glasses include front, brow, and temple protection. In addition to the clothing and eye protection listed above, commercial mixer/loaders must wear chemical resistant in place of rubber gloves except when the product is to be applied to a golf course. After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

NON-WPS INDUSTRIAL USES: When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear face shield, goggles, or safety glasses and chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow, and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required. Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

WPS 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, chemical resistant gloves made of any waterproof material, shoes plus socks, and protective eyewear, when cleaning equipment, mixing or loading. 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. After each day of use, clothing of PPE must not be reused until it has been cleaned. If this container is over one gallon and less than five gallons, mixers and loaders who do not use a mechanical system (such as a probe and pump or spigot) to transfer contents of this container must wear coveralls or a chemical resistant apron in addition to the other required PPE.

Engineering Controls Statements: If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. 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, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES:

Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF ON SKIN:

Wash with plenty of soap and water. Get medical attention.

IF SWALLOWED:

Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid

alcohol.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and 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 apply when weather conditions favor drift from target area. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other spraying. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not contaminate water when disposing of equipment washwaters. Do not apply this product through any type of irrigation system. Do not contaminate water used for irrigation or domestic purposes.

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 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.

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, chemical-resistant gloves made of any waterproof material, shoes plus socks and protective eyewear.

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. For Turf use, the maximum number of broadcast applications per treatment site is 2 per year.

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

DCDP[™] Selective Herbicide is for use on Ornamental Turf, such as Lawns, Parks, Cemeteries, Golf Courses (Fairways, Aprons, Tees* and Roughs) and similar non-crop areas, also for use on Sod Farms. *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 control of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. Use the higher rate for hard-to-control weeds. 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. Do not spray when air temperature exceeds 90°F. Do not use grass clippings from turf treated with this product for composting in the growing season of application. Do not use for mulch for 10 weeks following application.

The suitable use of on non-recommended turf species may be determined by treating a small area at any rate/acre which does not exceed 3 pints/acre. 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) turf should not be mowed 1 to 2 days before and following application: (3) reseed no sooner than 3 to 4 weeks after application of this product. Adding oil, wetting agent, or other surfactant to the spray may be used to increase effectiveness on weeds but doing so may reduce selectivity to turf resulting in turf damage. Clean and rinse spray equipment using soap or detergent and water, and rinse

thoroughly before reuse for other sprays.

Page 5

WEEDS CONTROLLED BY DCDP Selective Herbicide

Alder, Alfalfa, Artichoke, Aster, Austrian fieldcress, Beggartick, Biden, Bindweed, Bitter wintercress, Bitterweed, Black medic, Blackeyed Susan, Blessed thistle, Blue lettuce, Box elder, Broomweed, Buckbrush, Buckhorn, Buffalobur, Bull thistle, Bur ragweed, Burdock, Burhead, Buttercup, Canada thistle, Carpetweed, Catnip, Chamise, Cherokee rose, Chickweed, Chicory, Cinquefoil, Clover, Coastal redstem sage, Cockle, Cocklebur, Coffee bean, Coffeeweed, Common groundsel, Common sowthistle, Common sunflower, Cornflower (bachelor button), Corn speedwell, Coyotebrush, Creeping jenny, Croton, Curly Indigo, Dandelion, Devil's claw, Dock, Dogbane, Dogfennel, Elderberry, English daisy, False Chamomile (scentless), Fanweed, Fiddle neck, Flea bane (daisy), Flixweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Goosefoot, Ground ivy, Gumweed, Halogeton, Hawkweed, Healall, Heartleaf drymary, Hemp, Henbit, Hoary cress, Hop clover, Honeysuckle, Horsetail, Horseweed, Indiana mallow, Indigo, Ironweed, Jerusalem artichoke, Jewelweed, Jimsonweed, Klamathweed, Knapweed (diffuse, Russian, & spotted), Knawel, Knotweed, Kochia, Ladysthumb, Lambsquarter, Lespedeza, Little starwort, Locoweed, Lupine, Mallow, Many flowered aster, Manzanita, Marijuana, Marshelder, Matchweed, Meadow salsify (goatsbeard), Mexican weed, Milkvetch, Morningglory, Musk thistle, Mustard, Narrowleaf hawksbeard, Nettle, Nightshade (cutleaf & hairy), Orange hawkweed, Oxalis (stricta and corniculata), Parrotfeather, Parsley-piert, Parsnip, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Pineappleweed, Pinnate tansymustard, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prickly lettuce, Primrose, Puncture vine, Purslane, Rabbitbrush, Ragweed, Red clover, Red sorrel, Redroot pigweed, Redstem, Rush, Russian thistle, Salsify, Sheep sorrel, Shepherdspurse, Sicklepod, Smartweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spiderwort, Spurge, Spotted catsear, Spurweed, St. Johnswort, Starthistle, Stinging nettle, Stinkweed, Stitchwort, Sumac, Sunflower, Sweet clover, Tansymustard, Tansyragwort, Tarweed, Texas blueweed, Thistle, Toadflax, Tumbleweed, Velvetleaf, Veronica, Vervain, Vetch, Virginia creeper, White clover, Wild aster, Wild buckwheat, Wild carrot, Wild garlic, Wild geranium, Wild lettuce, Wild parsnip, Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Wild violet, Witchweed, Wormseed, Wormwood, Woodsorrel, Yarrow, Yellow rocket, Yellow starthistle, and other broadleaf weeds.

Some of these species may require repeat spot applications and/or use of higher rate recommended on this product label even under ideal conditions for application.

ORNAMENTAL LAWNS AND TURF

Apply DCDP Selective Herbicide Selective Herbicide at the rate of 2 to 3 pints in 20 to 240 gallons of water per acre (0.73 to 1.10 fl. oz. in 0.5 to 5.5 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.

Notes: 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 sq. ft.). 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 sq. ft.). 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 bentgrass greens or tees, On warm season grasses, exercise care when applying during growth stages from dormancy to green-up and from green-up to dormancy. Some temporary discoloration may occur. If Bermudagrass is dormant, up to 4 pints per acre may be used. However, some hybrid Bermuda grasses may be sensitive to this product. Contact your local extension service weed control specialist.

Herbi^w Controlled Droplet Applicator: Add 1-1/2 to 2-1/4 pints of DCDP to the F pint Herbi bottle, then fill with water to make 5 pints of mixture or substitute. T/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 DCDP 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 DCDP

Page 7/8

1

at the rate of 2 to 3 pints per acre (0.73 to 1.10 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).

Lower Volume Equipment: Use as little as 5 gallons of water per acre. Use only application equipment that is capable of spreading a uniform droplet, wetting each weed surface.

NOTE: For all grasses (1) Do not overlap spray patterns; (2) Use reduced rates if grass is stressed from heat, drought, etc.; and (3) Follow CDA equipment spray instructions.

COMPATIBILITY

DCDP can be mixed with some liquid fertilizers or liquid iron materials. Because liquid fertilizers and liquid iron differ in pH, free ammonia content, density, salt concentration and percentage of water, a compatibility test (given below) is recommended prior to mixing in the application equipment. All regulations, either State or Federal, relating to the application of liquid fertilizers or liquid iron and this product must be strictly followed. The following compatibility test should always be performed prior to full-scale mixing.

- 1. Pour 18 ounces of water into a quart jar.
- 2. Add 1 ounce of either the liquid fertilizer or liquid iron to be used.
- 3. Add 1 ounce of DCDP.
- 4. Close jar and shake well.
- 5. Watch the mixture for several seconds after shaking and check again after 30 minutes.
- 6. If the mixture does not show signs of separating, the combination may be used. If the mixture foams excessively, gels, separates or gets very thick, do not combine for field application.
- 7. Compatibility may be improved by the use of a compatibility agent. Some suggested compatibility agents to try are Kalo Laboratories Complex, Hopkins Chemical's Unite, Farm Chemicals Inc.'s Compat, Harcros Chemicals' T-Mulz 734-2, Rigo Company's Rigo Compatibility Agent, Witco Chemical's Sponto 168D, Amoco Oil's Amoco Spray Mate and Universal Coop.'s Chem-Link. These agents are all used in the same manner. Follow the previously outlined test procedures and add 1/6 ounce of the compatibility agent between steps (the compatibility agent must be added to the fertilizer or iron before adding the DCDP).
- 8. If the mixture does not separate, gel, foam or get very thick, it may be used for field application. Mix only the amount to be sprayed. Do not allow to stand overnight.

. Riverdale DCDP Selective Herbicide

8/8 Page 1

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: 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: Triple rinse (or equivalent), adding rinsate to spray tank. 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

WARRANTY

Riverdale 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_042400B)

Optional Statement:

In New York State: Do not apply more than 14.9 pints (0.28 pounds of clopyralid acid) Riverdale DCDP Selective Herbicide per acre per year.

Editor's Note:

'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.