

OFFICE: 425 WEST 194th STREET, GLENWOOD, IL 60425-1584 PLANT: 220 EAST 17th STREET, CHICAGO HEIGHTS, IL 60411-3699

June 3, 1993

Document Processing Desk (Notification) Registration Division - H7505C U. S. Environmental Protection Agency 401 M Street S.W. Washington, DC 20460

Dear Sir/Madam:

Subject: PR Notice 93-3 dated March 9, 1993 Riverdale 2D + 2DP Low Vol EPA Reg. No. 228-167 OPP Identifier No. 196201

Please find enclosed the necessary paperwork to notify the Agency that we are revising our label in accordance with the above subject PR Notice. If there is anything else we should do at this time, please contact us immediately.

Sincerely yours,

RIVERDALE CHEMICAL COMPANY

By Russell F. Sawyer Regulatory Affairs Manager

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RIVERDALE

2D + 2DP LOW VOL

A WOODY PLANT HERBICIDE FOR CONTROLLING MIXED BRUSH ON UTILITY RIGHTS-OF-WAY, HIGHWAYS, DRAINAGE DITCHBANKS, FENCE ROWS AND SOLID STANDS OF OAK OR ELM. CONTROLS NOXIOUS PERENNIAL WEEDS ON NON-CROPLAND.

ALSO CONTROLS NOXIOUS PERENNIAL WEEDS ON UNCROPPED LAND, LAWNS, GOLF COURSES, ATHLETIC FIELDS, PARKS, AND OTHER ORNAMENTAL TURF GRASS AREAS.

ACTIVE INGREDIENTS:	
Isooctyl Ester of 2,4-Dichlorophenoxyacetic Acid*	
Isooctyl Ester of 2-(2,4-Dichlorophenoxy)propionic Acid**	32.27
INERT INGREDIENTS:	35.7%
TOTAL	100.0%

Isomer Specific AOAC Method No. 6.321, Equivalent to: *2,4-Dichlorophenoxyacetic Acid 21.37, 1.83 lbs./gal. **2-(2,4-Dichlorophenoxy)propionic Acid 21.87, 1.87 lbs./gal.

KEEP OUT OF REACH OF CHILDREN

CAUTION - CAUCION

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqeta le haya sido explicada ampliamente.

SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NET CONTENTS GALS.

EPA REG. NO. 228-167

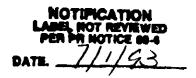
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MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

NOTE: Spanish language is optional



Rev'- d A/O 3/9/93

PRECAUTIONARY STATF'ENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION - CAUCION

Harmful if swallowed or absorbed through skin. Avoid inhalation of vapors or spray mist and contact with eyes, skin, or clothing. Wash nondisposable gloves thoroughly with soap and water before removing. Remove saturated clothing as soon as possible and shower.

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 cnemical resistant apron. If this container is five gallons or more in capacity, then a mechanical system (probe and pump) 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.

Please see additional Precautionary Statements in Directions For Use instructions.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. If vomiting occurs spontaneously, keep airway clean. Never give anything by mouth to an unconscious person. Get medical attention.

IF IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention.

IF ON SKIN: Wash exposed skin gently with plenty of soap and water.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Dr.ft or run-off may adversely affect aquatic invertebrates and non-target plants. For terr strial uses, 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 washwaters 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 irrigation ditches or water used for domestic purposes. If spills occur, collect the material and dispose of by following disposal instructions on this label. Use care to avoid spray contact or drift to 2,4-D or 2,4-DP susceptible plants such as okra, cotton, tomatoes, flowers, grapes, fruit trees, vogetables and ornamentals. Do not permit spray mist containing this product to drift onto them since even very small quantities of the spray, which Lay not be visible, can cause severe injury during both growing and dormant periods. Do not spray when the wind is blowing towards susceptible crops or ornamental plants. Use coarse sprays to vinimize drift. Spray drift can be lessened by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by using 20 pounds spraying pressure with flat fan or flooding flat on nozzle trps; by spraying when wind velocity is low; and, by stopping all spraying when wind exceeds 6 to 7 miles per hour. Do not apply with hollow cone-type insecticide or other nozzles that produce a fine droplet spray. Do not use in greenhouses. Do not use the same spray equipment for applying other materials to 2,4-D susceptible crops as injury may result.

NOTIMCATION

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D

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and 2,4-DP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling these pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or 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.

ADDITIONAL PRECAUTIONARY STATEMENTS FOR AGRICULTURAL CROP USES (i.e. Sod Farms and Forestry workers engaged in the commercial production of wood fiber or timber products including forestry site preparation)

When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasces), chemical resistant gloves, lorg-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 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. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands, face and arms before using toilet. 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. There isn't any restrictions on the annual maximum number of broadcast applications for Brush Control nor Sod Farms. Do not enter or allow worker entry into treated areas during the restricted-entry interval of 12 hours. No re-entry restriction for non-agricultural uses for Brush Control.

BRUSH CONTROL

RIVERDALE 2D + 2DP LOW VOL is specifically designed for utilities and other industrial users to control woody plants. This product also controls many noxious perential weeds on uncropped land, such as along highways, drainage ditchbanks and fence rows...The following is a partial list of the weeds controlled: Alder, Ash*, Aspen, Birch,: Blackberry, Black cherry, Black jack oak, Black locust, Box elder, Brambles, Buckbrush, Ceanothus, Chamise, Coffeeberry, Currant, Dewberry, Dogwood, Elderberry, Elms, Fir, Gooseberry, Greenbrier, Gum, Hemlock, Honeysuckle, Kudzuvine, Locust, Manzanita, Marles*, Multifloral rose, Oaks, Osag: orange, Palmetto, Persimmon*, Pine, Poison ivy, Poison oak, Poplar, Raspberry, Red e.der, Salmonberry, Sand sagebrush, Sassafras, Serviceberry, Shinnery oak, Snowberry, Spicebush, Spruce, Sumac, Sweetgum, Sycamore, ... Tulip poplar, Virginia creeper, Wild cherry, Wild grape, Wild rose, Willow, Winged elm,... Yerba santa, and many other species.

*Best controlled by stump or basal treatment.

Riverdale 2D + 2DP Low Vol

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TO PREPARE SPRAY: Add one-half the required amount of oil (kerosene, diesel or fuel oil) or water to the spray tank, then add this product with agitation and finally the balance of the water or oil with continued agitation. This material forms an emulsion in water not a solution. This tends to separate on standing. Provide agitation to prevent such separation and ensure a uniform mixture. If this material is to be used in straight oil mixtures, do not let water get into it or the finished mixture.

FOLIACE STEM TREATMENT: This is the standard method for high-volume sprays along fence rows, highways and rights-of-way. Use as a first spray on thick brush composed of mixed species. Apply to both stems and foliage from the time foliage is completely matured until the plants start to go dormant. All leaves, stems and suckers must be completely wet to the ground line for effective control. Some regrowth may be anticipated on the more resistant species, such as oak, maple, ash and persimmon. Add $1-1\frac{1}{2}$ gallons of RIVERDALE 2D + 2DP to 100 gallons of water using 200-600 gallons of spray mixture per acre, depending upon the height and thickness of the brush. Mix thoroughly before spraying.

SPOT TREATMENT: For spot spraying with backpack sprayer mix 1 cup (8 oz.) RIVER ALE 2D + 2DP with 5 gallons of water. Wet brush stems and foliage thoroughly.

BASAL BARK TREATMENT: Thoroughly wet the base and root collar of all stems until the spray accumulates around the root collar at the ground line. This spray may be applied during any season. Use RIVERDALE 2D + 2DP for basal bark treatment on scattered brush or as a second spray application on species resistant to first foliage application. Mix 3-4 gallons of RIVERDALE 2D + 2DP in 100 gallons of oil. Apply with a low volume sprayer or power equipment. Application rate will depend on species present, season applied and volume of spray used. Use a coarse spray to avoid drift.

MODIFIED BASAL TREATMENT: Drench the base of plants, then wet the lower 4/5 of remaining stems and leaves thoroughly to runoff. Apply treatment when brush is in full foliage. This method can be applied where susceptible species have been controlled by prior sprays and more resistant species, such as maple and oak, remain. Soaking the base of the plant and wetting all stems to runoff is absolutely necessary for complete control.

EARLY SEASON SPRAYING: Add $1-1\frac{1}{2}$ gallons of RIVERDALE 2D + 2DP to 10 gallons of diesel oil and thoroughly mix. Add this mixture to 89 gallons of water.

DURING DRY WEATHER OR THE LATTER PART OF SPRAYING SEASON: Add $1\frac{1}{2}$ gallons of RIVERDALE 2D + 2DP to 15 gallons of diesel oil and mix thoroughly. Add mixture to $83\frac{1}{2}$ gallons of water and agitate thoroughly before use to ensure uniform mixing. DO NOT allow mixture to stand more than 1 hour after mixing.

CUT SURFACE TREATMENT - STUMPS: This treatment may be used anytime of the year; however, it is more effective when applied as quickly as possible after trees are cut. Spray the entire stump, especially exposed roots and bark. A complete soaking is essential for effective control. Use this procedure after original or capital removal. It is the first step towards a chemical brush control program on newly cleared highways and rights-of-way. The spray is most effective and profitable on stumps 3-4 inches and larger. Mix 3-4 gallons of RIVERDALE 2D + 2DP in 100 gallons of oil. Application "Should be made with a low volume knapsack sprayer using a solid cone-shaped nozzle medium orifice.

CONCENTRATE STUMP TREATMENT: For small (up to 3 inch diameter) stems, cut them as

close to the ground as possible and apply undiluted RIVERDALE 2D + 2DP directly from the can to the surface of the freshly cut stump.

FRILL: Make a frill using an axe to cut overlapping V-shaped notches in a continuous ring, and cut around the trunk near its base. Cut through the bark, but do not remove the chips. This method is recommended for all trees 5-6 inches in diameter and larger. Freshly cut frills can be treated anytime of the year. Mix 3-4 gallons of RIVERDALE 2D + 2DP in 100 gallons of oil. Pour in as much of the mixture as the frills will hold without wasting the chemical.

POWERED KNAPSACK BASAL SPRAY: Mix 8-14 gallons of RIVERDALE 2D + 2DP with fuel oil or kerosene to make 100 gallons of spray solution. Apply with a potable knapsack mistblower to lower brush stems. Apply spray to all sides of stems; good root collar coverage is essential. Run knapsack mistblower at 1/4-1/3 throttle for best spray delivery and coverage. For maximum drift control use a basal nozzle attachment. Do not raise spray nozzle above horizontal position.

FENCE ROW APPLICATION: To control mixed brush, perennial and annual broadleaf weeds, use one of the application methods such as the foliage stem method described on this label. Some regrowth may be expected on resistant species such as ash, maple, oak and persimmon.

LOW VOLUME STEM FOLIAGE SPRAY - AERIAL OR GROUND: Apply the spray only through equipment designed to provide effective drift control.

MIXED BRUSH - UTILITY RIGHTS-OF-WAY: For aerial application to solid stands of brush use 2-4 quarts in 3-12 gallons volume per acre. 1-4 quarts of fuel oil may be included in this mixture.

SOLID STANDS OF OAK OR ELM: Apply with fixed-wing or helicopter aircraft. Apply in the Spring after hardwoods have just developed full sized leaves. The spray season normally runs from early May to mid-June in Texas and California, and from early May to early July in Oklahoma and northward. Spray when wind velocities are less than 5 miles per hour.

Brush	2D + 2Di	0i1	Add Water to Make Total	
post, blackjack oak and winged elm	2/3 gallon	, 1 gallon	5 gallons	
sand shinnery oak	l₂~l quart	l gallon	3 gallops.	

For maximum control, use higher rate and repeat spray the second year using 1 quart RIVERDALE 2D + 2DP per acre.

FORESTRY SITE PREPARATION: To reduce competition from mixed trees and brush before planting forest trees. Apply one gallon RIVERDALF 2D + 2DP for easy-to-control species. such as aspen, hazel, alder, sassafrass, sumac, black locust, willow, and other similar. species. Apply two gallons RIVERDALE 2D + 2DP to control more difficult species such ... as oaks, sweet gum, black gum, hickory and tulip-poplar.

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Mix with water to make 10 gallons total solution when applying as a aerial spray or 20 gallons total solution when applying as a ground spray. Do not apply to established plantations as this spray mix will injure planted conifers.

PINE RELEASE: To control hardwood brush and release Northern conifers such as red pine, Jack pine, white pine, and white spruce.

Apply 2-4 quarts RIVERDALE 2D + 2DP as a 'roadcast spray in 10 gallons of water per acre. Make applications in midsummer after pine height growth is complete and the conifer buds are set. RIVERDALE 2D + 2DP will control aspen, birch, cherry, alder, hazel, oaks, and similar species. RIVERDALE 2D + 2DP will not, at these rates, provide satisfactory control of red maple, sugar maple or ash.

RIVERDALE 2D + 2DP LOW VOL and BANVEL HERBICIDE^(R) MIXTURES

HIGH VOLUME STEM FOLIAGE SPRAY - Mix 1 gallon to $1\frac{1}{2}$ gallons RIVERDALE 2D + 2DP with 1-2 quarts Banvel 4WS per 100 gallons total spray mix. Use the low rate for easy to kill brush such as alders, aspen, cherry, sycamore, tulip-poplar, and willows. Use the high rate to control species such as oak, ash, elm, pines, spruce, and fir.

LOW VOLUME STEM FOLIAGE SPRAY: Aerial or Ground - Mix 2-3 gallons of RIVERDALE 2D + 2DP with $1-1\frac{1}{2}$ gallons Banvel herbicide in 15-50 gallons of water per acre to control mixed brush including conifers and ash.

Observe all restrictions, precautions and limitations on the labeling of each product use in tank mixture.

TURF CONTROL

ADDITIONAL PRECAUTIONARY STATEMENTS FOR TURF CONTROL

When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves. Commercial mixers/loaders must also wear these clothes, except when the product is to be applied to golf courses. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. 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.

Lawns and other ornamental turf grass areas - RIVERDALE 2D + 2DP LOW VOL is recommended for professional weed control of broadleaf weeds in lawns, ornamental turf, and similar turf areas. This treatment may injure bentgrass, St. Augustinegrass, centipedegrass, carpetgrass and newly seeded lawns. If necessary to control weeds in such turf, use half the recommended rate in chart and repeat application in 2 to 3 weeks. Do not apply to Lippia, Dichondra and where desirable Clovers are present nor on bentgrass greens.add tees as severe turf injury may result. Do not use this product to control weeds in flower and vegetable beds, shrubs and ornamental plantings. Spray when air is calm to avoid spray drift that might injure nearby desirable plants. A separate sprayer should be kept for killing weeds as 2,4-D and related chemicals are difficult to clean from equipment. The following is a partial list of weeds controlled by RIVERDALE 2D + 2DP

Bindweed, Black medic, Brambles, Buckhorn plantain, Bull thistle, Burdock, Buttercups, Canada thistle, Carolina geranium, Chickweeds (common and mouseear), Chicory, Clovers, Cocklebur, Cudweed, Dandelion, Dock, Evening primrose, False dandelion, Fleabane, Florida pusley, Frenchweed, Ground ivy, Hawkweed, Healall, Henbit, Honeysuckle, Jimsonweed, Knotweed, Kochia, Kudzu, Lambsquarters, Little startwort, Mallow, Morningglory, Mustards, Oxalis (yellow woodsorrel), Pennywort, Peppergrass, Pigweed, Plantains (narrow or buckhorn; broadleaf), Poison ivy, Poison oak, Poorjoe, Povertyweed, Purslane, Ragweed, Sheep sorrel, Shepherdspurse, Smartweeds, Soliva, Sowthistle, Speedwell (annual), Spurge, Sumac, Vervain, Vetch, Violet, Wild aster, Wild blackberry, Wild carrot, Wild garlic, Wild geranium, Wild lettuce, Wild onion, Wild radish, Wild raspberry, Yarrow.

This product is not effective on perennial Veronicas or on weed grasses. Resistant weeds such as Oxalis (yellow woodsorrel), Bindweed and Yarrow should be retreated whenever new growth appears. Control of difficult weeds such as Sheep (red) sorrel, Soliva, and Violets may be only partial.

PREPARATION OF THE SPRAY: Fill the spray tank with half of the required amount of water, then add the recommended amount of RIVERDALE 2D + 2DP herbicide with agitation and finally the balance of water with agitation. Apply any time broadleaf weeds are growing actively. Dandelion, plantain, wood sorrel and clovers are best treated in the Fall or in Spring before flower heads develop. Winter weeds such as chickweeds and henbit should be treated in early Spring.

Summer weeds such as oxalis, knotweed and spurges should be sprayed when they are small. Resistant weeds such as bindweed and violets may require 3 quarts per 40,000 sq. ft. and should be retreated whenever new growth appears. In areas with extended growing seasons, such as California, treatment in both Spring and Fall may be needed to control more resistant species.

On turf to be over-seeded in the Fall, treatment should be scheduled at least 4 weeks before the planned seeding date. Rainfall ($\frac{1}{4}$ inch or more) or irrigation should occur prior to seeding. Fall-seeded lawns may be treated the following Spring. Spring-seeded lawns may be treated after the grasses have sprouted and been cut at least twice, generally 6-10 weeks after seeding, depending on germination and growth rate.

For established lawns, Fall treatment fits into a good turf management program. Proper fertilization and mowing should be combined with chemical weed control to thicken the turf after the weeds have died and to discourage more weeds from invading.

HOSE ATTACHED SPRAYERS (LAWN MODELS): Use $1\frac{1}{2}$ teaspoons of RIVERDALE 2D + 2DF herbicide diluted with water to the 3-5 gallon mark on the sprayer jar for each 500 square feet (25' x 20') of lawn area to be sprayed. Adjust water pressure so that spray streams about 10-15 feet with no misting.

RIVERDALE 2D + 2DP	AMOUNTS TO USE AREA COVERED	WATER VOLUME
1½ oz. 8 oz.	1,000 sq. ft. 5,000 sq. ft.	1 gal. 5 gals.
1 pt.	10,000 sq. ft.	10 gals.

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2 qts.	40,000 sq. ft.	40 gals.
3 qts. (resistant weeds)	40,000 sq. ft.	40 gals.

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. 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 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, stray mixtures, or rinsate is a violation of Federal law and may contaminate ground ater. 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 dispose also by incineration, or if allowed by state and local authorities by burning. If burned. stay out of smoke.

NOTE: Local conditions and application regulations vary and may affect use of this herbicide. Consult local agricultural experiment station or extension service weed specialists and state regulatory agencies for recommendations in your area.

(R)Banvel Herbicide - Registered Trademark of the Sandoz Crop Protection Corp.

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 reasonably foreseeable. The user assumes all risks of any such use. (ERP 102393) (PR933 042194)