

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

41123

228-295

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APR 03 1996

Russell F. Sawyer  
 Riverdale Chemical Company  
 425 West 194th Street  
 Glenwood, Illinois 60425-1584

Dear Mr. Sawyer:

SUBJECT: Label Amendment  
 Riverdale Veteran (R) 720  
 EPA Registration No. 228-295  
 Your Application Dated January 24, 1996 Requesting  
 Addition of Escort to Tank Mix and Revised Label  
 Format

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, with the following provisions:

1. Under the "Statement of Practical Treatment make the following revisions":
  - a. In the "Skin Statement" add the sentence, "Get medical attention if irritation persists."
  - b. In the "Eye Statement" revise the statement to read, "Flush eyes with plenty of water. Call a physician irritation persists."
2. In the "Pesticide Disposal" statement, the following sentence should be placed as the second sentence in the statement, "Triple rinse pesticide from containers and use rinsates in the pesticide application."
3. Please note the label contains minor typographical errors which should be corrected before final printing.

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	DMorgan							
DATE ▶	Apr 3, 1996							

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A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned labeling before releasing the product for shipment.

Sincerely,

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

)  
Enclosure  
  
)

RIVERDALE  
VETERAN® 720 HERBICIDE

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WATER SOLUBLE INDUSTRIAL HERBICIDE FOR CONTROL OF BRUSH AND  
BROADLEAF WEEDS ON RIGHTS-OF-WAY, FOREST BRUSH, FENCE ROWS,  
NON-IRRIGATION DITCHBANKS, WASTELAND, GENERAL FARMSTEAD,  
PASTURES, RANGELANDS AND SIMILAR NONCROPLAND AREAS

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic Acid* . . . . .	24.58%
Dimethylamine Salt of Dicamba (3,6-dichloro-o-anisic Acid)** . . . . .	12.82%
INERT INGREDIENTS: . . . . .	62.60%
TOTAL . . . . .	100.00%

Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid . . . . .	20.4%, 1.9 lbs./gal.
**3,6-dichloro-o-anisic Acid . . . . .	10.6%, 1.0 lbs./gal.

KEEP OUT OF REACH OF CHILDREN  
CAUTION  
SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS  
AND STATEMENT OF PRACTICAL TREATMENT

EPA Reg. No. 228-295

NET CONTENTS GALS.

EPA Est. No. 228-IL-1

MANUFACTURED BY  
RIVERDALE CHEMICAL COMPANY  
GLENWOOD, ILLINOIS 60425-1584

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
APR 03 1996

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

228-295

Revised 1/24/95 Spigots previously added. Revised to RCC format and added Escort to tank mix. Also added some Wilbur Ellis Adjuvants, Activators and Neutralizers, and revised to agree with Sandoz's Stewardship changes.

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes, or clothing. When mixing, loading, or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical-resistant gloves, long sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits 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 and before eating, smoking, drinking or 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. Remove saturated clothing as soon as possible and shower. If this container has a volume less than 5 gallons, all persons engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron. If this container has a volume of 5 gallons or more, 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.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Drink 1 or 2 glasses of water and induce vomiting by sticking finger down back of throat. Never induce vomiting or give anything by mouth to an unconscious person.

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

**IF IN EYES:** Flush with water for 15 minutes and get medical attention.

**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 contaminate water when disposing of equipment washwaters. Do not contaminate irrigation ditches or water used for domestic purposes. Do not apply this product through any type of irrigation system.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D 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.

Avoid making application when spray particles may be carried by air currents to areas where sensitive crops and other desirable plants are growing. Always make application where there is some air movement in order to determine the direction and distance of possible spray drift. Leave an adequate buffer zone between the area to be treated and desirable sensitive plants. Coarse sprays are less likely to drift out of target area. Do not use aerial equipment to apply VETERAN 720 Herbicide when sensitive crops and plants are growing in the vicinity of area to be treated. Select nozzles designed to produce minimal amounts of fine spray particles. Drift control agents and equipment designed to minimize fine spray particles may be used.

Do not graze dairy animals on treated areas until 21 days after application for 1 gallon (1 lb. ai) or 49 days for up to 2 gallons (2 lb. ai). For veal and other meat animals, treat areas 30 days prior to slaughter. Do not cut grass for hay within 30 days of application of 1 gallon (1 lb. ai) or within 49 days for 2 gallons (2 lb. ai).

**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.**

For use on plants in non-crop and non-timber areas only. Not for use on trees, crops, or other plants being grown for sale or other commercial use, or for commercial seed production, or for the production of timber or wood products, or for research purposes.

VETERAN® 720, a water soluble industrial herbicide for brush and broadleaf weed control, is recommended for use on rights-of-way (utility, railroad, highway, pipeline), nonselective forest brush control, fence rows, non-irrigation ditchbanks, wasteland, general farmstead, pastures, rangelands and similar non-cropland areas.

**SENSITIVE CROP PRECAUTIONS**

VETERAN 720 Herbicide may cause injury to desirable trees and plants, particularly beans, cotton, flowers, fruit trees, grapes, ornamentals, peas, potatoes, soybeans, sunflowers, tobacco, tomatoes and other broadleaf plants when contacting their roots, stems or foliage. These plants are most sensitive to VETERAN 720 Herbicide during their development or growing stage.

Do not treat areas where either possible downward movement into the soil or surface washing may cause contact of VETERAN 720 Herbicide with the roots of desirable plants such as trees and shrubs.

To avoid injury to desirable plants, equipment used to apply VETERAN 720 Herbicide should be thoroughly cleaned (see PROCEDURE FOR CLEANING SPRAY EQUIPMENT on back panel) before reusing to apply any other chemicals.

**MIXING AND APPLICATION**

VETERAN 720 Herbicide is a water-soluble formulation which can be applied using water or oil/water emulsions as the carrier. Herbicide adjuvants or other spray additives (emulsifiers, surfactants, wetting agents, drift control agents, or penetrants) such as Pedit-Vert™, Bivert®, Cayuse™, R-11®, and R-900®; may be used for wetting, penetration, or drift control. Read and follow all use recommendations and precautions on the label(s) of product(s) used. A COMPATIBILITY TEST (see other panel) should be made prior to tank mixing.

VETERAN 720 Herbicide may be applied with ground or aerial equipment for broadcast treatments, or with handgun, backpack, or similar types of equipment for treatment of individual clumps or small areas (spot treatments).

NOTE: To prepare oil/water emulsions, shake well before using, half fill spray tank with water. Add a suitable emulsifier. Then, with constant agitation, slowly add the appropriate amount of herbicide followed by the necessary oil (or slowly add a premix of emulsifier and oil). Finally, fill the rest of the tank with water. Maintain vigorous agitation during spray operation to prevent oil and water from forming separate layers.

**SPECIES CONTROLLED**

When used as directed, VETERAN 720 Herbicide will control or suppress many herbaceous broadleaf weeds (annual, biennial, and perennial) as well as many unwanted woody plant and vine species. Species controlled include:

Buckwheat, Wild  
 Carpetweed  
 Chickweed  
 Clover  
 Cocklebur  
 Daisy, English  
 Henbit  
 Knazel

**ANNUALS**

Lambsquarters  
 Morningglory  
 Mustard  
 Pigweed  
 Purslane  
 Ragweed  
 Smartweed  
 Velvet leaf

**BIENNIALS**

Russet, Tansy

Thistle, Musk

Bindweed, Field  
 Carrot, Wild  
 (Queen Anne's Lace)  
 Dock, Curly  
 Dogfennel  
 Knapweed, Russian

**PERENNIALS**

Milkweed  
 Ragweed, Perennial  
 Sorrel, Sheep  
 Spurge, Leafy  
 Thistle, Canada  
 Toadflax, Dalmation

**WOODY BRUSH AND VINES**

Alder  
 Ash  
 Aspen  
 Basswood  
 Beech  
 Birch  
 \*Blackberry  
 Cherry  
 Creeper, Virginia  
 \*Creosotebush  
 Cucumber tree  
 \*Dogwood  
 Elderberry  
 Elm  
 Gum  
 \*Hawthorn  
 Hemlock  
 Honeysuckle  
 Ivy, Poison  
 Kudzu  
 Locust  
 Maple  
 Oak  
 Olive, Russian

Persimmon  
 Pine  
 \*Plum, Wild  
 Poplar  
 Puncturevine  
 Raspberry  
 \*Redcedar, Eastern  
 Redvine  
 \*Rose, Multiflora  
 Sagebrush  
 Sassafras  
 Schinus  
 (Florida Holly,  
 Brazil Peppertree,  
 Christmas-berry)  
 Serviceberry  
 Snowberry  
 Spruce  
 Sumac  
 Sycamore  
 Trumpet creeper  
 Waxmyrtle  
 Willow  
 Witchhazel  
 \*Yaupon

\*Suppression

**RATES**

Regardless of the species to be controlled, spray volumes should be high enough to allow for good spray coverage. Make applications when weeds and brush are actively growing. The addition of surfactants can increase control. Biennials are best controlled when treated in the rosette stage. Regrowth may occur on resistant species. Retreatments may be made as needed; however, do not exceed a total of 2 gallons (2 lbs. a.i. dicamba + 3.8 lbs. a.i. 2,4-D) of VETERAN 720 Herbicide per treated acre during a growing season. To control additional weed species, VETERAN 720 Herbicide may be tank mixed with any of the products listed on this label.

**HERBACEOUS BROADLEAF WEED CONTROL:** Apply 1 to 4 quarts of VETERAN 720 Herbicide in 20 to 100 gallons of water per treated acre. 1 to 2 quarts of VETERAN 720 Herbicide is recommended for annuals, 2 to 4 quarts for biennials and easy-to-kill perennials, and 4 quarts for established perennials. Do not apply more than 2 gallons of product per treated acre.

**BRUSH AND VINE CONTROL - High Volume Foliar Spot Applications:** Mix 1 to 2 gallons of VETERAN 720 Herbicide in enough water to make 100 gallons of spray mix. Spray volume applied will depend on the size and density of the brush to be treated, but do not apply more than 2 gallons of product per treated acre. Direct the spray to treat all foliage, stems, and root collars to wet.

**BRUSH AND VINE CONTROL - Broadcast Applications with Ground Equipment:** Apply 1 to 2 quarts of VETERAN 720 Herbicide in 20 to 100 gallons of water per treated acre. Spray volume applied will depend on the size and density of the brush to be treated, but do not apply more than 2 gallons of product per treated acre. Spray all foliage, stems, and root collars to wet.

**AERIAL APPLICATIONS:** Aerial applications may be made to control either herbaceous or woody plants. Apply 1 to 4 quarts of VETERAN 720 Herbicide (for herbaceous weeds) or 1 to 2 gallons of VETERAN 720 Herbicide (for woody brush and vines) in 20 to 100 gallons of water.

per treated acre. Coverage is important, so increase spray volume when treating dense stands of brush or weeds. Do not apply more than 2 gallons of product per treated acre.

#### TANK MIX TREATMENTS

READ AND FOLLOW THE LABEL OF EACH TANK MIX PRODUCT USED FOR PRECAUTIONARY STATEMENTS, DIRECTIONS FOR USE, AND OTHER RESTRICTIONS. For broader spectrum control, VETERAN 720 Herbicide may be tank mixed with one or more of the following herbicides for noncropland uses (e.g. railroad, highway, pipeline, etc.) including forest management Pastures and Rangeland applications, if permitted by product labeling (e.g. 2,4-D). Add water to the spray tank prior to the addition of the tank mix products. Do not premix concentrates.

Herbicide	Rate (lbs.a.i./treated acre)
Amitrol*	1.8 to 8.0
Asulam (Asulox <sup>®</sup> )	2.92 to 6.68
Atratul	4.77 to 39.96
Bromacil (Hyvar <sup>®</sup> )	1.6 to 24.0
Clorflurecol (Maintain <sup>®</sup> )	2.0 to 3.0
Chlorsulfuron (Telar <sup>®</sup> )	0.1875 to 2.25 oz.***
Dalapon	4.25 to 12.75
Dicamba (Banvel <sup>®</sup> )	0.25 to 1.75****
Diquat	0.5 to 1.0
Diuron (Karmex <sup>®</sup> )	4.0 to 48.0
Fenac (Fenatrol <sup>®</sup> )	4.5 to 18.0
Fosamine ammonium (Krenite <sup>®</sup> )	6.0 to 12.0
Glyphosate (Roundup <sup>®</sup> )	0.75 to 3.75
Hexazinone (Velpar <sup>®</sup> )	0.675 to 10.8
Imazapyr** (Arsenal <sup>®</sup> )	0.5 to 1.5
Limit <sup>®</sup> **	0.625
Maleic hydrazide (Royal Slo-Gro <sup>®</sup> )	2.25 to 4.5
Mefluidide (Embark <sup>®</sup> )	0.25 to 1.0
Metsulfuron Methyl (Escort <sup>®</sup> ) <sup>1</sup>	0.3 to 0.9***
MSMA	1.0 to 2.475
Paraquat*	0.5
Picloram* (Tordon <sup>®</sup> )	2.0 to 3.0
Simazine* (Princep <sup>®</sup> )	4.8 to 40.0
Sulfometuron methyl (Oust <sup>®</sup> )	0.75 to 9.0 oz.***
Tebuthiuron (Spike <sup>®</sup> )	1.0 to 16.0
Triclopyr (Garlon <sup>®</sup> )	0.75 to 12.0
2,4-D	0.475 to 3.5*****
2,4-DP	0.5 to 11.1

Due to variations that may occur in formulated products and specific use ingredients (e.g. water supplies) a COMPATIBILITY TEST as described below is recommended prior to actual tank mixing.

- \* Restricted use pesticides limited to certified applicators.
- \*\* Limit does not have a common name.
- \*\*\* Telar - 0.1875 to 2.25 oz. a.i./A (0.25 to 3.0 oz. product/A)  
Oust - 0.75 to 9.0 oz. a.i./A (1.0 to 12.0 oz. product/A)  
Escort - 0.3 to 0.9 oz. a.i./A (0.5 to 1.5 oz. product/A)
- \*\*\*\* Do not exceed a total of 2 lbs. a.i. dicamba per treated acre per growing season (VETERAN 720 Herbicide contains 1 lb. a.i. dicamba per gallon.)
- \*\*\*\*\* Use of extremely hard water (500 ppm) may cause this product to form a precipitate when used in a tank mix with VETERAN 720 Herbicide. To avoid this, use a total 2,4-D acid equivalent per acre per application per site of 1.0 or less (1.0 lbs. total 2,4-D acid equivalent per treated acre per growing season). VETERAN 720 Herbicide contains the equivalent to 1.0 lbs. of 2,4-D acid.

Use Riversdale Veteran 720 and Escort to reduce the development and spread of resistant biotypes and problem weeds such as Kochia and Russian thistle. More resistant weeds typically require multiple spray applications to obtain adequate control. To reduce the number of applications required, applicators can utilize a mixture of Escort and Veteran 720. Apply as a tank mix for persistence as follows: All acreage treated with 1.0 quart of Veteran 720 per acre. A non-resistant biotype can be controlled for

wetting, penetration or drift control.

NOTE: All intended tank mix combinations should be used only in recommended areas on the same broadleaf weed species found on both labels. For application methods and other use specifications, use the most restricted limitations from labeling of both products.

#### COMPATIBILITY TEST

Before mixing in the spray tank, it is advisable to test compatibility by mixing all components in a small container in proportionate quantities (see following table).

#### Amount of Herbicide to Add to One Pint of Spray Carrier (Assuming Volume is 25 Gallons per Acre)

<u>HERBICIDE FORMULATIONS</u>	<u>RATE PER ACRE</u>	<u>LEVEL TEASPOONS</u>
Dry	1 lb.	1-1/2
Liquid	1 pt.	1/2

If herbicide(s) do not ball-up or form flakes, sludge, gels, oily films or layers, or other precipitates, then the tested components are compatible. Usually incompatibility in any of the above described forms will occur within 5 minutes after mixing.

If components are incompatible, the use of a compatibility agent is recommended. Rerun the above COMPATIBILITY TEST with a suitable compatibility agent (1/4 teaspoon is equivalent to 2 pints per 100 gallons of spray solution).

#### PROCEDURE FOR CLEANING SPRAY EQUIPMENT

The steps listed below are suggested for thorough cleaning of spray equipment following applications of VETERAN 720 Herbicide or tank mixes of VETERAN 720 Herbicide plus 2,4-D Amine.

- 1) Hose down thoroughly the inside as well as outside surfaces of equipment while filling the spray tank half full of water. Flush by operating sprayer until the system is purged of the rinse water.
- 2) Fill tank with water while adding 1 quart of household ammonia or 1/4 pint of Neutral-Clean™ for every 25 gallons of water. Operate the pump to circulate the ammonia solution through the sprayer system for 15 to 20 minutes and discharge a small amount of the ammonia solution through the boom and nozzles. Let the solution stand for several hours, preferably overnight.
- 3) Flush the solution out of the spray tank through the boom.
- 4) Remove the nozzles and screens and flush the system with two full tanks of water.

The steps listed below are suggested for thorough cleaning of spray equipment used to apply VETERAN 720 Herbicide as a tank mix with wettable powders (WP), emulsifiable concentrates (EC), or other types of water dispersible formulations. VETERAN 720 Herbicide tank mixes with water dispersible formulations require the use of a water/detergent rinse.

- 5) Complete step 1.
- 6) Fill tank with water while adding 2 lbs. of detergent for every 40 gallons of water. Operate the pump to circulate the detergent solution through the boom and nozzles. Let the solution stand for several hours, preferably overnight.
- 7) Flush the detergent solution out of the spray tank through the boom.
- 8) Repeat step 1, and follow with steps 2 and 4.



**STORAGE:** Always store pesticides in original container and in a secured warehouse or storage building. Do not store near seeds, fertilizers, insecticides or fungicides. Store at temperatures above 32°F. If allowed to freeze, rewarm to 40°F, remix thoroughly 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 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 and may contaminate ground water. 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.

Local conditions may affect the uses of this chemical as shown on this label. Consult State Experiment Station or Extension Service Weed Specialist for specific recommendations for local weed problems and for information on possible lower dosages.

#### REGISTERED TRADEMARKS

Arsenal® is a registered trademark of American Cyanamid Company.  
 Asulox® is a registered trademark of Rhone-Poulenc Chemical Company.  
 Cayuse™, Neutral-Clean™ and Redi-Vert™ are trademarks and Bivert®, R-11®, and R-900® are registered trademarks of Wilbur-Ellis Company.  
 Embark® is a registered trademark of 3M.  
 Escort®, Hyvar®, Karmex®, Krenite®, Oust®, Telar®, and Velpar® are registered trademarks of E. I. duPont de Nemours & Co., Incorporated.  
 Fenatrol® is a registered trademark of Union Carbide Agricultural Products Co., Inc.  
 Garlon®, and Tordon® are registered trademarks of Dow Chemical Company  
 Limit® and Roundup® are registered trademarks of Monsanto Agricultural Products Company.  
 Maintain® is a registered trademark of U.S. Borax & Chemical Corporation.  
 Princep is a registered trademark of Ciba-Geigy Corporation.  
 Royal Slo-Gro® is a registered trademark of Uniroyal, Incorporated.  
 Spike® is a registered trademark of Elanco Products Company.  
 Veteran® is a registered trademark of Riverdale Chemical Company.

#### WARRANTY

Riverdale Chemical 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, mixture with other chemicals, and other 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 unusual or not reasonably foreseeable. The user assumes all risks of any such use.

EC 9124 061