

MAR 12 1997

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

Dear Mr. Sawyer:

SUBJECT: Label Amendment and Change in Signal Word
 Riverdale Veteran 720 Herbicide
 EPA Registration No. 228-295
 Your Application Dated October 9, 1996

The labeling referred to above, submitted in accordance 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 "Oral Statement" revise the sentence to read as follows: "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."
 - b. The following "Note to Physician" is required: "Probable mucosal damage may contraindicate the use of gastric lavage."
2. In the "Storage and Disposal" section, under the "Storage" statement, the last sentence ("Do not contaminate water,...") should be moved and relocated immediately under the "Storage and Disposal" heading.

A stamped copy is enclosed for your records. In addition, a copy of the review is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

Sincerely yours,

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

Enclosure

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	DMorgan							
DATE ▶	Mar 12, 1997							

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RIVERDALE
VETERAN® 720 HERBICIDE

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,
AND SIMILAR NONCROPLAND AREAS. ALSO FOR PASTURES AND RANGELANDS

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.

NOT FOR SALE TO OR USE BY HOMEOWNERS

KEEP OUT OF REACH OF CHILDREN

DANGER

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
MAR 12 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
228-295

REC'D EPA/OP/DPDI
96 OCT 15 AMO 50

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, and similar non-cropland areas. Also for pastures and rangeland.

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 Redi-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
Knawel

ANNUALS

Lambsquarters
Morningglory
Mustard
Pigweed
Purslane
Ragweed
Smartweed
Velvetleaf

BIENNIALSRagwort, Tansy
Thistle, Musk**PERENNIALS**

Bindweed, Field	Milkweed
Carrot, Wild (Queen Anne's Lace)	Ragweed, Perennial
Dock, Curly	Sorrel, Sheep
Dogfennel	Spurge, Leafy
Knapweed, Russian	Thistle, Canada
	Toadflax, Dalmation

WOODY BRUSH AND VINES

Alder	Persimmon
Ash	Pine
Aspen	*Plum, Wild
Basswood	Poplar
Beech	Puncturevine
Birch	Raspberry
*Blackberry	*Redcedar, Eastern
Cherry	Redvine
Creeper, Virginia	*Rose, Multiflora
*Creosotebush	Sagebrush
Cucumber tree	Sassafras
*Dogwood	Schinus
Elderberry	(Florida Holly, Brazil Peppertree, Christmas-berry)
Elm	Serviceberry
Gum	Snowberry
*Hawthorn	Spruce
Hemlock	Sumac
Honeysuckle	Sycamore
Ivy, Poison	Trumpet creeper
Kudzu	Waxmyrtle
Locust	Willow
Maple	Witchhazel
Oak	*Yaupon
Olive, Russian	
*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. When using low-volume application equipment, 3 to 20 gallons of water per acre is acceptable. 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. When using low-volume application equipment, 3 to 20 gallons of water per acre is acceptable. 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 gallons of VETERAN 720 Herbicide in 20 to 100 gallons of water per treated acre. When using low-volume application equipment, 3 to 20 gallons of water per acre is acceptable.

using low-volume application equipment, 3 to 20 gallons of water per acre is acceptable. 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 5 to 40 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®)	2.92 to 6.68
Atratul	4.77 to 39.96
Bromacil (Hyvar®)	1.6 to 24.0
Clorflurecol (Maintain®)	2.0 to 3.0
Chlorsulfuron (Telar®)	0.1875 to 2.25 oz.***
Dalapon	4.25 to 12.75
Dicamba (Banvel®)	0.25 to 1.75****
Diquat	0.5 to 1.0
Diuron (Karmex®)	4.0 to 48.0
Fenac (Fenatrol®)	4.5 to 18.0
Fosamine ammonium (Krenite®)	6.0 to 12.0
Glyphosate (Roundup®)	0.75 to 3.75
Hexazinone (Velpar®)	0.675 to 10.8
Imazapyr** (Arsenal®)	0.5 to 1.5
Limit® **	0.625
Maleic hydrazide (Royal Slo-Gro®)	2.25 to 4.5
Mefluidide (Embark®)	0.25 to 1.0
Metsulfuron Methyl (Escort®) ¹	0.3 to 0.9***
MSMA	1.0 to 2.475
Paraquat*	0.5
Picloram* (Tordon®)	2.0 to 3.0
Simazine* (Princep®)	4.8 to 40.0
Sulfometuron methyl (Oust®)	0.75 to 9.0 oz.***
Tebuthiuron (Spike®)	1.0 to 16.0
Triclopyr (Garlon®)	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. Do not exceed 4 lbs. total 2,4-D acid equivalent per acre per application per site. Do not

Using Riverdale Veteran 720 and Escort to reduce the development and spread of resistant biotypes and problem weeds such as Kochia and Russian thistle: Some commonly 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 postemergence as follows: Add 0.5 oz. of Escort to 1-1/2 quart of Veteran 720 per acre. A non-ionic or silicone surfactant may be used 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 2,3 and 4.

- 7) Flush the detergent solution out of the spray tank through the boom.
- 8) Repeat step 1, and follow with steps 2,3 and 4.

STORAGE AND DISPOSAL

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 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 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 abnormal or not reasonably foreseeable. The user assumes all risks of any such use.
 (RV 100996)