

228-397

03-31-2004

117

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number  
**300325**

**Application for Pesticide - Section I**

1. Company/Product Number 228-397	2. EPA Product Manager J. I. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Riverdale Vanquish Herbicide	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas Inc. 1333 Burr Ridge Parkway, Suite 125A Burr Ridge, IL 60527-0866  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**NOTIFICATION**

**MAR 31 2004**

**Explanation: Use additional page(s) if necessary. (For section I and Section II.)**

Switched competitors' product name for ours.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes * <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.      No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Russell F. Sawyer	Title Regulatory Affairs Manager	Telephone No. (Include Area Code) 708/754-3330
---------------------------	-------------------------------------	---

**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6 Data Application Received  
(Stamped)

2. Signature 	3. Title Regulatory Affairs Manager
4. Typed Name Russell F. Sawyer	5. Date March 18, 2004

NOTIFICATION 2/11  
MAR 3 1 2004

Riverdale®  
VANQUISH® HERBICIDE

For selective broadleaf weed and brush control on noncrop lands in the following uses: established turf grasses (including golf courses) and lawns, rights-of-way (including roadways, utility, railroad, highway, pipeline, and rights-of-way that run through pasture and rangeland), utility facilities (including substations, pipelines, tankfarms, pumping stations, parking and storage areas, non-irrigated ditchbanks, and fencerows), fencerows and forest site preparation.

ACTIVE INGREDIENT:

Diglycolamine Salt of 3,6-dichloro-o-anisic Acid*	56.8%
OTHER INGREDIENTS:	43.2%
TOTAL:	100.0%

By Isomer Specific Method, Equivalent to:

\*3,6-dichloro-o-anisic Acid..... 38.5%, 4.0 lbs./gal.

Riverdale is a Registered Trademark of Nufarm Americas, Inc.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY**

**AND FIRST AID STATEMENTS**

EPA REG. NO. 228-397

NET CONTENTS GALS.

EPA EST. NO. 228-IL-1

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

Revised A/O 7/16/02 Per EPA's Comment letter.  
3/8/04 Replaced competitors' product names for ours, use notification.

3/17

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

Avoid contact with skin, eyes, or clothing. Harmful if swallowed. Avoid breathing spray mist.

**FIRST AID STATEMENT**

Have the product container label with you when calling a poison control center or doctor or going for treatment.

**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 by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

**PERSONAL PROTECTIVE EQUIPMENT(PPE):** Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance selection chart. Applicators and other handlers must wear long-sleeved shirt, long pants, shoes, socks and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS****Users Should:**

- Wash hands 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.

**ENGINEERING CONTROL STATEMENTS:** When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in 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.

4/17

**ENVIRONMENTAL HAZARDS**

Keep out of lakes, streams, or ponds. Do not apply directly to water, 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 wash water.

This chemical is known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

1. Point source contamination - To prevent point source contamination, do not mix, load this pesticide product within 50 ft. of wells (including abandoned wells and drainage wells), sink holes, perennial or intermittent streams and rivers, and natural or impounded lakes and reservoirs. Do not apply pesticide product within 50 ft. of wells. This setback does not apply to properly capped or plugged abandoned wells and does not apply to impervious pad or properly diked mixing/loading areas as described below.

Mixing, loading, rinsing, or washing operations performed within 50 ft. of a well are allowed only when conducted on an impervious pad constructed to withstand the weight of the heaviest load that may be on or move across the pad. The pad must be self-contained to prevent surface water flow over or from the pad. The pad capacity must be maintained at 110% of that of the largest pesticide container or application equipment used on the pad and have sufficient capacity to contain all product spills, equipment or container leaks, equipment wash water, and rain water that may fall on the pad. The containment capacity does not apply to vehicles delivering pesticide shipments to the mixing/ loading site. States may have in effect additional requirements regarding wellhead setbacks and operational containment.

Care must be taken when using this product to prevent: (a) back-siphoning into wells, (b) spills, or (c) improper disposal of excess pesticide, spray mixtures, or rinsates. Check valves or anti-siphoning devices must be used on all mixing equipment.

2. Movement by surface runoff or through soil - Do not apply under conditions which favor runoff. Do not apply to impervious substrates such as paved or highly compacted surfaces in areas with high potential for ground water contamination. Ground water contamination may occur in areas where soils are permeable or coarse and ground water is near the surface. Do not apply to soils classified as sand with less than 3% organic matter and where ground water depth is shallow. To minimize the possibility of ground water contamination, carefully follow application rate recommendations as affected by soil type in the General Information section of this label.

3. Movement by water erosion of treated soil - Do not apply or incorporate this product through any type of irrigation equipment or by flood or furrow irrigation. Ensure treated areas have received at least one-half inch rainfall (or irrigation) before using tailwater for subsequent irrigation of other fields.

**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 protection 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 12 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, shoes, socks and chemical resistant gloves made of any waterproof material.

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR WEED CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.

**GENERAL INFORMATION**

The following directions apply to all uses of Vanquish. Do not treat irrigation ditches or water used for crop irrigation or domestic uses. Do not apply this product through any type of irrigation system. Additional precautions and restrictions will be found in each specific use section.

**Sensitive Crop Precautions**

Vanquish 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 Vanquish during their development or growing stage. Injury to desirable broadleaf plants will occur if spray is allowed to contact their foliage, stems, or roots. Do not allow spray to drift away from target area. FOLLOW THE PRECAUTIONS LISTED BELOW WHEN USING VANQUISH.

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

To avoid injury to desirable plants, equipment used to apply Vanquish should be thoroughly cleaned (see Procedure for Cleaning Spray Equipment section) before reusing to apply any other chemicals.

**Management of Off-Site Movement**

The following spray drift management precautions should be followed to avoid off-target movement of Vanquish during applications. Avoid making applications when spray particles can be carried by wind to sensitive off-site areas. Avoid making applications in gusty wind conditions or if wind is moving in the direction of sensitive crops. The potential for injury increases with higher wind speed.

Aerial application should be avoided in the vicinity of sensitive off-site crops and plants.

Consult your local or state authorities for possible application restrictions and advice concerning these and other special local use situations. Tank mix recommendations are for use only in states where the tank mix product and application site are registered.

6/17

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops.

### APPLICATION PROCEDURES

#### Aerial Application

1. The distance of the outermost nozzles on the boom must not exceed  $\frac{3}{4}$  the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downward more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered below.

#### Information on Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions sections).

#### Controlling Droplet Size

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger droplets.

When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

#### Boom Length

For some use patterns, reducing the effective boom length to less than  $\frac{3}{4}$  of the wingspan or rotor length may further reduce drift without reducing swath width.

#### Application Height

Applications should not be made at a height greater than 10 ft. above the top of the largest plants, unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

#### Swath Adjustment

When applications are made with a crosswind, the swath will be displaced downward. Therefore, on the up and downwind edges of the field, the applicator must compensate for

7/17

this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller drops, etc.).

**Wind**

Drift potential is lowest between wind speeds of 3-10 mph. Do not apply Vanquish at sustained wind speeds greater than 15 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential.

**Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

**Temperature and Humidity**

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

**Temperature Inversions**

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

**Sensitive Areas**

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, nontarget crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

**Ground Application****Information on Droplet Size**

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions sections).

**Controlling Droplet Size**

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles.

Examples of nozzles designed to produce coarse sprays for ground applications are the Radiarc Sprayer; Delavan Raindrops, Raindrop Flood, or Flooding Spray nozzles; Spraying Systems, Drift Guard DG TeeJets, Turbo TeeJets, or Turbo FloodJet nozzles or large volume flat fan nozzles used with low pressure. Nozzles that produce a narrow angle spray pattern will generally have larger droplets.

**Boom Height**

Making applications with the boom at the lowest height that produces a uniform spray pattern will reduce exposure of droplets to evaporation and wind.

**Swath Adjustment**

When applications are made with a crosswind toward sensitive areas, the application should leave a buffer to avoid off-site movement.

**Wind**

Drift potential is lowest between wind speeds of 3-10 mph. Do not apply Vanquish at sustained wind speeds greater than 15 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential.

**Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

**Temperature and Humidity**

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

**Temperature Inversions**

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

**Sensitive Areas**

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, nontarget crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Approved drift reducing agents may be used.

**SPRAY EQUIPMENT**

**Procedure for Cleaning Spray Equipment**

The steps listed below are suggested for thorough cleaning of spray equipment following applications of Vanquish.

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 qt. of household ammonia for every 25 gals. of water. Operate the pump to circulate the ammonia solution through the sprayer system for 15-20 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 Vanquish as a tank mix with wettable powders (WP), emulsifiable concentrates (EC), or other types of water-dispersible formulations. Vanquish 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 gals. of water.



Operate the pump to circulate the detergent solution through the sprayer system for 5-10 minutes and discharge a small amount of the 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.

**MIXING PROCEDURES**

**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 Pt. of Spray Carrier  
(Assuming Volume is 25 Gals./A)**

Herbicide Formulation	Rate Per Acre	Level Tsp.
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, layers, or other precipitates, then the tested spray mix is 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 tsp. is equivalent to 2 pts./100 gals. of fluid fertilizer).

**CROP USE DIRECTIONS**

**General Weed List**

This is a general list of weeds which may be treated with Vanquish in accordance with this label, as recommended under the Rates and Timings sections of the individual use headings. Proper usage of this product will give control or growth suppression of many annual, biennial, and perennial broadleaf weeds, and many woody brush and vine species including:

**Annuals**

Amaranth, Spiny (Spiny Pigweed)	Goosefoot, Nettleleaf	Pennycress, Field (Fanweed,	Senna, Coffee
Aster, Slender	Henbit	Frenchweed, (Stinkweed)	Sesbania, Hemp
Bedstraw	Jimsonweed	Pepperweed, Virginia (Peppergrass)	Shepherdspurse
Beggarweed, Florida	Knotweed	Pigweed, Prostrate	Sicklepod
Broomweed, Common	Kochia (triazine resistant)	Pigweed, Redroot (Carelessweed)	Sida, Prickly (Teaweed)
Buckwheat, Wild	Ladysthumb	Pigweed, Rough	Smartweed, Green
Buffalobur	Lambsquarters, Common	Pigweed, Smooth	Smartweed, Pennsylvania
Burclover, California	Common	Pigweed (triazine resistant)	Sneezeweed, Bitter
Burcucumber	Lambsquarters (triazine resistant)	Pigweed, Tumble	Sowthistle, Annual
Buttercup, Roughseed	Lettuce, Prickly	Poorjoe	Sowthistle, Spiny
Carpetweed	Mallow, Common	Puncturevine	Spanishneedles
Catchfly, Nightflowering	Mallow, Venice	Purslane, Common	Spikeweed, Common
Chamomile, Corn	Marestail (Horseweed)	Pusley, Florida	Spurge
Chickweed, Common	Mayweed	Radish, Wild	Spurry, Corn
Clovers (Annual)	Medic, Black	Ragweed, Common	Starbur, Bristly
Cockle, Corn	Morningglory, Ivyleaf	Ragweed, Giant (Buffaloweed)	Sumpweed, Rough
Cockle, Cow	Morningglory, Tall	Ragweed Lance-Leaf	Sunflower, Common (Wild)
Cocklebur, Common	Mustard, Tansy	Rubberweed, Bitter	Sunflower, Volunteer
Croton, Tropic	Mustard, Wild		Thistle, Russian
Croton, Woolly	Mustard (Yellowtops)		Velvetleaf
Daisy, English			Waterhemp
Eveningprimrose, Cutleaf			Waterprimrose, Winged

Fleabane, Annual	Nightshade, Black	(Bitterweed)	Wormwood, Annual
------------------	-------------------	--------------	------------------

**Biennials**

Burdock, Common	Geranium, Carolina	Plantain, Bracted	Thistle, Bull
Carrot, Wild (Queen Anne's Lace)	Gromwell	Ragwort, Tansy	Thistle, Milk
Cockle, White	Knapweed, Diffuse	Starthistle, Yellow	Thistle, Musk
Eveningprimrose, Common	Knapweed, Spotted	Sweetclover	Thistle, Plumeless
	Mallow, Dwarf	Teasel	

**Perennials**

Alfalfa*	Clover, Hop*	Milkweed, Climbing	Sowthistle, Perennial
Artichoke, Jerusalem	Dandelion, Common*	Milkweed, Common	Spurge, Leafy
Aster, Spiny	Dock, Broadleaf*	Milkweed, Honeyvine	Sundrop, Halfshrub
Aster, Whiteheath	(Bitterdock)	Milkweed, Western	(Eveningprimrose)
Bedstraw, Smooth	Dock, Curly*	Whorled	Thistle, Canada
Bindweed, Field	Dogbane, Hemp	Nettle, Stinging	Toadflax, Dalmatian
Bindweed, Hedge	Dogfennel*	Nightshade, Silverleaf	Tropical Soda Apple
Blueweed, Texas	(Cypressweed)	(White Horsenettle)	Trumpetcreeper
Bursage*	Fern, Bracken	Onion, Wild	(Buckvine)
(Bur Ragweed, Lakeweed, Povertyweed)	Garlic, Wild	Plantain, Broadleaf*	Vetch
Bursage, Woollyleaf (Lakeweed)	Goldenrod, Canada	Plantain, Buckhorn	Violet, Wild
Buttercup, tall	Goldenrod, Missouri	Pokeweed	Waterhemlock
Campion, Bladder	Goldenweed, Common	Ragweed, Western	Waterprimrose, Creeping
Chickweed, Field	Hawkweed	Sericia Lespedeza	Woodsorrel, Creeping*
Chickweed, Mouseear (Canada)	Henbane, Black	Redvine	(Common Yellow)
Chicory	Horsenettle, Carolina	Smartweed, Swamp	Wormwood, Common
	Ironweed	Snakeweed, Broom	Wormwood, Louisiana
	Ivy, Ground	Sorrel, Red*	Yankeeweed*
	Knapweed, Black	(Sheep Sorrel)	
	Knapweed, Russian	Sowthistle	Yarrow, Common

\*Noted perennials may be controlled using Vanquish at rates lower than those recommended for other listed perennial weeds. (See Rates and Timings section.)

**Woody**

Ailanthus (Tree of Heaven)	Cucumbertree	Ivy, Poison	Rose, McCartney*
Alder	Dewberry*	Kudzu	Rose, Multiflora
Ash	Dogwood*	Locust, Black	Sagebrush, Fringe
Aspen	Elm	Maple*	Sassafras
Basswood	Gallberry	Mesquite	Serviceberry
Beech	Grape	Oak*	Spicebush
Birch	Hackberry	Oak, Poison	Spruce
Blackberry*	Hawthorn*	Olive, Russian	Sumac
Blackgum*	(Thornapple)	Persimmon,	Sweetgum*
Brazilian Pepper	Hemlock	Eastern	Sycamore
Cedar*	Hickory	Pine	Tarbrush
Cherry	Honeylocust	Plum, Sand*	Wax Myrtle
Chinquapin	Honeysuckle	(Wild Plum)	Willow
Cottonwood	Hornbeam	Poplar	Witchhazel
Creosotebush*	Huckleberry	Rabbitbrush	Yaupon*
	Huisache	Redcedar, Eastern	Yucca*

\*Tank mixtures may be needed for optimal control.

**RIGHTS-OF-WAY, UTILITY AND INDUSTRIAL AREAS, AND FENCEROWS**

Vanquish is recommended for use on general farmstead weed and brush control and for use on non-crop land areas such as rights-of-way (such as roadways, rest areas, utility, railroad, highway, pipeline, and rights-of-way that run through pasture and rangeland);

utility facilities (such as substations, pipelines, tankfarms, pumping stations, parking and storage areas, fencerows, and nonirrigated ditchbanks); brush control for forest site preparation or maintenance.

Observe all Precautions on this label. Read and follow the Mixing and Application section.

**General Farmstead**

Vanquish can be used on or around farms and farmstead for control of many broadleaf weeds and brush in noncrop land areas only.

**Rights-of-Way**

Vanquish can be used to control many broadleaf weeds on rights-of-way. This use includes applications to roadside, roadway and highways; to areas along utilities such as cable and powerlines; railroad track and embankment; highways, highway medians, bridge abutments, pipelines, and rights-of-way that run through pasture and rangeland. Use controlled application techniques that minimize the risk of off-target movement.

**Utility and Industrial Areas**

Vanquish can be used to control many broadleaf weeds and brush in noncrop areas on or surrounding substations, pipelines, tankfarms, pump stations, production facilities, and bareground situations. It may also be used on parking and storage areas (refer to Best Stewardship Practices to avoid direct runoff from impervious surfaces).

**Fencerows**

Vanquish can be used to control many broadleaf weeds and brush in fencerows.

**Mixing and Application**

Read and observe Management of Off-Site Movement recommendations in this label. Vanquish can be applied using water, oil in water emulsions including invert systems, or sprayable fluid fertilizer as a carrier. A compatibility test (see Compatibility Test section) should be made prior to tank mixing.

To prepare oil in water emulsions, half-fill spray tank with water, then add the appropriate amount of emulsifier. With continuous agitation, slowly add the herbicide and then the herbicidal oil or a pre-mix of oil plus additional emulsifier to spray tank. Complete filling of spray tank with water. Maintain vigorous agitation during spray operation to prevent oil and water from forming separate layers.

Vanquish may be applied broadcast using either ground or aerial application equipment. When using ground equipment, apply low or high volume sprays of between 3 to 600 gals. of diluted spray per treated acre. Volume of spray applied will depend on the height, density, and type of weeds or brush being treated and on the type of equipment being used. When using aerial equipment, apply 5 to 40 gals. of diluted spray per treated acre.

Vanquish may be applied to individual clumps or small areas (spot treatment) of undesirable vegetation using handgun or similar types of application equipment. Apply diluted sprays to allow complete wetting (up to runoff) of foliage and stems.

Herbicide adjuvants or other spray additives (emulsifiers, spreader stickers, surfactants, wetting agents, drift control agents, or penetrants) may be used for wetting, penetration, or drift control. Spray additives must be agriculturally approved when used in pasture applications. If spray additives are used, read and follow all use recommendations and precautions on product label.

**Weeds and Brush Controlled**

Vanquish, when applied at recommended rates, will give control of many annual, biennial, and perennial broadleaf weeds, and many woody brush and vine species commonly found in noncrop-land areas. (Refer to General Weed List.) Noted ( \*) perennial weeds may be controlled with lower rates of either Vanquish or Vanquish plus tank mix combinations. See Rates and Timings below.

**Table 1: Rates and Timings**

Application rates and timings of Vanquish are given below. Use the higher level of listed rate ranges when treating dense or tall vegetative growth.

Weed Stage and Type	Amount of Product Per Acre	Gals. Of Spray Mixture Per Acre**	Spray Concentration for Use with Low Volume Application**** (%vol/vol)
Annual Small, Actively Growing Established weed growth	1/2 to 1 pt. 1 to 1-1/2 pts.	25 to 50 50 to 75	3 3
Biennial* -Rosette diameter Less than 3" 3" or more Bolting	1/2 to 1 pt. 1 to 2 pts. 2 to 3 pts	25 to 50 50 to 100 100 to 150	3 to 4 3 to 4 3 to 4
Perennial Suppression or top growth control Noted (*) Perennials Other Perennials	1/2 to 1 pt. 2 to 4 pts. 4 pts.	50 to 100 100 to 200 200	4 4 5
Woody Brush and Vines*** Top Growth Stems and Roots	1/2 to 4 pts. 4 pts.	50 to 200 200	5 5

\* For best performance, make application when biennial weeds are in the rosette stage.

\*\* Assuming typical application rate of 1 qt. of Vanquish/100 gals.

\*\*\* Tank mixes may be required for optimal control. Refer to General Weed List.

\*\*\*\* Low volume rates must not exceed 4 pts. of Vanquish maximum per acre per year (5% volume/volume = 10 gals. maximum solution per acre per year).

Retreatments may be made as needed; however, do not exceed a total of 4 pts. (2 lbs. a.i.) of Vanquish per treated acre during a growing season.

#### TANK MIX OPTIONS

Vanquish may be tank mixed with other herbicides for additional weed control. The following table lists example options, but does not limit tank mix options.

READ AND FOLLOW THE LABEL OF EACH TANK MIX PRODUCT USED FOR PRECAUTIONARY STATEMENTS, DIRECTIONS FOR USE, APPLICATION RATES, AND OTHER RESTRICTIONS. Consult product labels for rate recommendations for tank mix partners.

Table 2: Tank Mixes

Herbicide	Rates Per Treated Acre (lbs. A.i.)
norflurazon (Predict®) prodiamine (Endurance®) glufosinate (Finale®) glyphosate (Razor®, Razor® Pro) metsulfuron methyl (Patriot™, Manor®) pendimethalin (Pendulum®) triclopyr (Tahoe®) clopyralid (Transline®) bromacil (Hyvar®) chlorsulfuron (Telar®) diquat (Reward®) simazine (Princep®) diuron (Karmex®) DSMA fosamine ammonium (Krenite®) hexazinone (Velpar®) imazapyr (Arsenal®) imazemeth (Plateau®) MSMA sulfometuron methyl (Spyder®) sulfosate (Touchdown ® ) tebuthiuron (Spike®) 2,4-D	<p style="text-align: center;">Consult product labels for rate recommendations.</p>

Due to the differences that may occur between specific formulated products and specific use ingredients (e.g., water supplies), a compatibility test (see Compatibility Test section) is recommended prior to actual tank mixing.

**CUT SURFACE TREE TREATMENTS**

Vanquish may be applied as a cut surface treatment for control of unwanted trees and prevention of sprouts of cut trees. A mix of 1 part Vanquish with 1 to 3 parts water should be used in application; surfactants or oil may be added to potentially enhance control. Use the lower dilution when treating difficult-to-control species. Applications work best if made within 30 minutes of cutting.

**Frill or Girdle Treatments:** Make a continuous cut or a series of overlapping cuts using an axe to girdle tree trunk. Spray or paint cut surface with the Vanquish/ water mix.

**Stump Treatments:** Spray or paint freshly cut surface with the water mix. The area adjacent to the bark should be thoroughly wet.

**DORMANT APPLICATIONS FOR CONTROL OF MULTIFLORA ROSE**

Vanquish can be applied when plants are dormant as an undiluted Spot-Concentrate directly to the soil or as a Lo-Oil Basal Bark treatment using an oil-water emulsion solution.

Spot-Concentrate applications of Vanquish should be applied directly to the soil as close as possible to the root crown, but within 6 to 8 inches of the crown. On sloping terrain, application should be made to the uphill side of the crown. Do not make application when snow or water prevents applying Vanquish directly to the soil. The use rate of Vanquish is dependent on the canopy diameter of the multiflora rose. Examples: Use Vanquish at 1/4, 1, or 2-1/4 fl. oz. of product respectively for 5, 10, or 15 ft. canopy diameters. Do not exceed a total of 2 qts. of Vanquish per acre per year.

Lo-Oil Basal Bark applications of Vanquish should be applied to the basal stem region from the ground line up to a height of 12-18 inches. Spray until runoff, with special emphasis on covering the root crown. For best results, make application when plants are dormant. Do not make application after bud break or when plants are showing signs of active growth. Do

14/17

not make application when snow or water prevents applying Vanquish to the ground line. Refer to the Mixing and Application section for method of preparing oil-in-water emulsion. Example for making approximately 2 gals. of a Lo-Oil spray solution mixture: combine 1-1/2 gals. of water plus 1 oz. of emulsifier plus 1 pt. of Vanquish plus 2-1/2 pts. of No. 2 diesel fuel. Adjust amounts of materials used proportionately to the amount of final spray solution desired. Do not exceed 8 gals. of spray solution mix applied per acre per year.

**FOREST SITE PREPARATION**

**General Information**

Vanquish may be used for control of undesirable conifers as well as many broadleaf weeds, vines, brambles, hardwood brush, and trees in forest site preparation. Vanquish may be applied as broadcast foliar sprays from ground or aerial equipment. Vanquish is absorbed through the leaf surfaces quickly after spraying and will also be absorbed from the soil by the roots. Translocation through the leaves, stems, and roots provides control of undesirable young conifer and broadleaf species. Woody plants, brush, and trees may not display the full extent of herbicide efficacy until several months following treatment. Vanquish provides application flexibility for extended windows of application and tank mix options (refer to Mixing and Application Procedures and Tank Mix Options).

**Mixing and Application Instructions**

**Ground Operated Spray Equipment**

Thoroughly mix and apply the recommended amount of Vanquish (2 qts./ A maximum) in a minimum of 15 gals. of water per acre. Spray solution should uniformly cover undesirable foliage for best results. A suitable nonionic surfactant should be added to the spray solution to enhance foliage wetting, spreading, and solution absorption. Drift control and foam reducing agents may be added at recommended rates, if needed. Spray pattern indicator agents may also be added at recommended rates, if desired. DO NOT spray under windy or gusty conditions. Maintain proper buffer zones to ensure drift does not reach off-target vegetation.

**Aerial Spray Equipment**

Thoroughly mix the recommended amount of Vanquish (2 qts./A maximum) in a minimum of 10 gals. of water per acre and uniformly apply with properly calibrated aerial equipment. A suitable nonionic surfactant should be added to the spray solution to enhance wetting, spreading, and solution absorption. All precautions should be taken to minimize or eliminate spray drift. Drift control and foam control agents may be added at recommended rates, if needed.

**Tank Mix Options**

For extended range of species control, tank mix Vanquish with other forest site preparation products such as Arsenal, Manor, Patriot, Razor, Razor Pro, Spyder, Tahoe, etc. Observe all precautions and restrictions on the product labels. Always follow the most restrictive label in a tank mix.

**TURF AND LAWNS**

Including Golf Course (Fairways, Aprons, Tees, and Rough), Parks, Recreational areas, Lawn care application, Sod farms

**IMPORTANT:** Observe all Precautions on this label. Read and follow Mixing and Application Procedures.

Established grass stands growing under stress can exhibit various injury symptoms that may be more pronounced if herbicides are applied. To avoid injury to newly seeded grasses, application of Vanquish should be delayed until after the second mowing. Furthermore, application rates in excess of 1 pt. (1/2 lb. a.i.) per treated acre may cause noticeable stunting or discoloration of sensitive grass species such as bentgrass, carpetgrass, buffalograss, and St. Augustinegrass.

In areas where roots of sensitive plants extend, do not apply in excess of 1/4 pt. (1/8 lb. a.i.) of Vanquish per treated acre on coarse-textured (sandy-type) soils, or in excess of 1/2 pt. (1/4 lb. a.i.) per treated acre on fine-textured (clay-type) soils. Do not make repeat applications in these areas for 30 days and until previous applications of Vanquish

have been activated in the soil by rain or irrigation.

**Weeds Controlled**

Vanquish, when applied at recommended rates, will give control of many annual, biennial, and noted (\*) perennial broadleaf weeds commonly found in turf. Vanquish will also give growth suppression of many other listed perennial broadleaf weeds and woody brush and vine species. (Refer to General Weed List.)

**Mixing and Application**

Apply 30 to 200 gals. of diluted spray per treated acre (3 qts. to 4-1/4 gals./1,000 sq. ft.), depending on density or height of weeds treated and on the type of equipment used.

**Rates and Timings**

Use the higher level of listed rate ranges when treating dense vegetative growth.

**Table 3: Vanquish Broadcast Application Rates**

Weed Stage and Type	Pts. Per Treated Acre	Lbs. a.i. Per Treated Acre	Tsp. Per 1,000 sq.ft.
<b>Annual</b> Small, actively growing Established weed growth	1/2 to 1 pt. 1 to 1-1/2 pts.	1/4 to 1/2 1/2 to 3/4	1 to 2-1/4 2-1/4 to 3-1/4
<b>Biennial*</b> -Rosette diameter Less than 3 inches 3 inches or more	1/2 to 1 pt. 1 to 2 pts.	1/4 to 1/2 1/2 to 1	1 to 2-1/4 2 -1/4 to 4-1/2
<b>Perennial, Woody Brush, and vines</b>	1 to 2 pts.	1/2 to 1	2-1/4 to 4-1/2

\*For best performance, make application when biennial weeds are in the rosette stage.

For best performance, apply when weeds are emerged and actively growing.

Retreatments may be made as needed; however, do not exceed a total of 2 pts. (1 lb. a.i.) of Vanquish per treated acre during a growing season.

**Tank Mix Treatments**

READ AND FOLLOW THE LABEL OF EACH TANK MIX PRODUCT USED FOR PRECAUTIONARY STATEMENTS, DIRECTIONS FOR USE, APPLICATION RATES AND TIMINGS, AND OTHER RESTRICTIONS. Consult product labels for rate recommendations for tank mix partners. OBSERVE ALL PRECAUTIONS AND RESTRICTIONS ON THE PRODUCT LABELS. ALWAYS FOLLOW THE MOST RESTRICTIVE LABEL IN A TANK MIX.

Tank mix treatments of Vanquish may be made with 2,4-D, MCPA, MCPP, Confront, or bromoxynil for control of additional. Weeds listed on the tank mix product label.

Apply 1/4 to 1/2 pt. (1/10 to 1/4 lb. a.i.) of Vanquish per treated acre with 1/2 to 1-1/2 lbs. acid equivalent of 2,4-D, MCPA, or MCPP, or with 1 to 2 pts. of Confront, or with 3/8 to 1/2 lb. a.i. of bromoxynil. Use the higher level of the listed rate ranges when treating established weeds. Repeat treatments may be made as needed; however, do not exceed 2 pts. (1 lb. a.i.) of Vanquish per treated acre during the growing season.

16/17

**STORAGE AND DISPOSAL**

**Storage:** Store in original container in a well-ventilated area separately from fertilizer, feed, and foodstuffs. Avoid cross- contamination with other pesticides. Spillage or leakage should be contained and absorbed with clay granules, sawdust, or equivalent material for disposal. Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Disposal:** Triple rinse pesticide from containers and use rinsates in the pesticide application. If container is damaged or if pesticide has spilled, contain all spillage. Place in a closed, labeled container for proper disposal. In the event of a major spill, fire, or other emergency, call 1-800-888-8372, day or night. Wastes which cannot be used according to label instructions may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Triple rinse container (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or if plastic, by incineration, or by open burning, if allowed by state and local authorities. If burned, keep out of smoke.

**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 the 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 071602A)

Endurance®, Predict®, Princep®, Vanquish® and the Syngenta logo are the trademarks of a Syngenta Group Company  
Arsenal®, Pendulum®, and Plateau® trademarks of American Cyanamid Company  
Confront®, Spike®, and Transline® trademarks of Dow AgroSciences LLC  
Diglycolamine® trademark of Texaco Chemical Company  
Hyvar®, Karmex®, Krenite®, Telar®, and Velpar® trademarks of E. I. DuPont de Nemours and Company, Inc.  
Finale® trademark of AgrEvo USA Company  
Reward® and Touchdown® trademarks of ICI America  
Manor®, Patriot™, Riverdale®, Razor®, Razor® Pro, Spyder® and Tahoe® registered trademarks of Nufarm Americas, Inc.





17/17

**Nufarm Americas Inc.**  
1333 Burr Ridge Parkway, Suite 125  
Burr Ridge, IL 60527  
Phone: 708.754.3330 Fax: 708.754.0314  
www.nufarm.com

UPS - Overnight  
March 18, 2004

Document Processing Desk (NOTIF)  
Registration Division (7505C)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Crystal Mall Building, #2  
1921 Jefferson Davis  
Arlington, VA 22202

Dear Sir/Madam:

Subject: Riverdale Vanquish Herbicide  
EPA Registration No. 228-397  
Application For Pesticide: Other  
OPP Identifier No. 300325  
Label Revision

Please find enclosed what we believe to be the necessary paperwork to notify the Agency of our most recent label change. We are substituting our product names for those of our competitors on the Vanquish label. We have enclosed an extra copy highlighting these changes.

If there is anything else we should do at this time please contact us.

Sincerely yours,

NUFARM AMERICAS INC.

A handwritten signature in black ink, appearing to read 'R. Sawyer', written over a faint circular stamp.

By Russell F. Sawyer  
Regulatory Affairs Manager

RFS:jb

Enclosures