



228-416

01-18-2005

1/9

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 228-416	2. EPA Product Manager Joanne Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) RiverdaleEscalade Low Odor	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas Inc. 1333 Burr Ridge Parkway, Suite 125A Burr Ridge, IL 60527 <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 _____	NOTIFICATION JAN 18 2005
<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.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
 The lbs/gallon values were corrected on the front page, under isomer specific equivalencies.
 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 wilfully 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	If "Yes" Package 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	
6. Manner in Which Label is Affixed to Product <input checked="" 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 Jeannie Smith	Title VP, Registrations & Regulatory Affairs	Telephone No. (Include Area Code) 708 755-7332
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. Date Application Received (Stamped)
2. Signature <i>Jeannie Smith</i>		
3. Title		
4. Typed Name Jeannie Smith		
5. Date December 22, 2004		

2/9
NOTIFICATION
JAN 18 2005

RIVERDALE® ESCALADE™ LOW ODOR



FOR SELECTIVE BROADLEAF WEED CONTROL
IN ORNAMENTAL LAWNS AND TURF GRASSES
CONTAINS 2,4-D, FLUROXYPYR AND DICAMBA

CONTROLS: Dandelion, Chickweed, Black medic, Knotweed, Plantain, Oxalis, Clover, Cocklebur, Thistle and many other species of broadleaf weeds; some of which are listed on this label.

ACTIVE INGREDIENTS:

Triisopropanolamine Salt of 2,4-Dichlorophenoxyacetic Acid*	50.59%
1-Methylheptyl Ester of Fluroxypyr:((4-amino-3-5-dichloro-6-fluoro-2-pyridinyl)oxy)acetic Acid, 1-methylheptyl Ester**	7.32%
Dicamba (3,6-Dichloro-o-Anisic Acid)***	3.39%

OTHER INGREDIENTS:	38.70%
TOTAL	100.00%

By Isomer Specific AOAC Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	27.12%, 2.7 lbs./gal.
**((4-amino-3-5-dichloro-6-fluoro-2-pyridinyl)oxy)acetic Acid	5.09%, 0.5 lbs./gal.
***3,6-Dichloro-o-Anisic Acid	3.39%, 0.3 lbs./gal.

KEEP OUT OF REACH OF CHILDREN

WARNING - AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, call (877) 325-1840

EPA REG. NO. 228-416
EPA EST. NO. 228-IL-1

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



NET CONTENTS GALS.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING - AVISO**

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

PERSONAL PROTECTIVE EQUIPMENT (PPE)

NON-WPS TURF USES: Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) (in general only agricultural plant uses are covered by the WPS) must wear face shield, goggles, or safety glasses and long pants, long-sleeved shirt, socks, shoes and rubber gloves when mixing, loading or applying this product. It is recommended that safety glasses include front, brow, and temple protection. In addition to the clothing and eye protection listed above, commercial mixer/loaders must wear chemical-resistant in place of rubber gloves except when the product is to be applied to a golf course. After using this product, rinse gloves before removing, remove clothing and laundry separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

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

WPS USES: Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170) (in general, agricultural plant uses are covered) must wear: coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, chemical-resistant headgear for overhead exposure and chemical-resistant apron when cleaning equipment, mixing or loading. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned. If this container is over one gallon and less than five gallons, mixers and loaders who do not use a mechanical system (such as a probe and pump or spigot) to transfer contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

Engineering Controls Statements: If this container is five gallons or more in capacity, do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS	
Users Should:	
<ul style="list-style-type: none"> • Wash hands, face, and arms with soap and water before eating, smoking, drinking, or using the toilet. • Remove clothing immediately and shower if clothing becomes saturated or 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. 	

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • 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 do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.

FIRST AID (continued)	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.</p>	

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Drift or runoff from treated areas may be hazardous to aquatic organisms and nontarget plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from target area. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other spraying. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not contaminate water when disposing of equipment washwaters. Do not apply this product through any type of irrigation system. Do not contaminate domestic or irrigation waters.

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 these herbicides 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.**

This pesticide should be used strictly in accordance with the drift and run-off precautions on this label in order to minimize off-site exposure.

Under some conditions this product may have a potential to run-off to surface water or adjacent land. Where possible, use methods which reduce soil erosion, such as no till, limited till and contour plowing; these methods also reduce pesticide run-off. Where feasible, use application techniques such as T-banding and in-furrow techniques which incorporate the pesticide into the soil. Use of vegetation filter strips along rivers, creeks, streams, wetlands, etc. or on the downhill side of fields where run-off could occur will minimize water run-off is recommended.

Low humidity and high temperatures increase the evaporation rate of spray droplets and therefore the likelihood of increased spray drift. Avoid spraying during conditions of low humidity and/or high temperatures.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 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, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

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

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

This product is for use on Ornamental Turf Lawns (Residential, Industrial and Institutional), Parks, Cemeteries, Athletic Fields, Golf Courses (Fairways, Aprons, Tees* and Roughs), along Highways, Rights-Of-Way and similar turf areas. Also for use on Sod Farms. *Excluding Bentgrass Tees

USE PRECAUTIONS

Avoid mist to vegetables, flowers, ornamentals, shrubs, trees and other desirable plants. Do not pour spray solutions near these plants. Do not spray on carpetgrass, dichondra nor on lawns or turf where desirable clovers are present. Avoid fine mists. Except as noted, use lawn-type sprayers with coarse spray, as wind drift is less likely. Use coarse spray droplets. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other species.

Avoid contact with exposed feeder roots of ornamentals and trees. Maximum control of weeds will be obtained from Spring or early Fall applications when weeds are actively growing. Use the higher rate for hard-to-control weeds.

Adding oil, wetting agent, or other surfactant to the spray may be used to increase effectiveness on weeds but doing so may reduce selectivity to turf resulting in turf damage. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other sprays.

Do not apply to newly seeded grasses until well established. Do not spray when air temperature exceeds 90 F. Avoid applying during excessively dry or hot periods unless irrigation is used. For optimum results: (1) avoid applying during excessively dry or hot periods unless irrigation is used; (2) turf should not be mowed for 1 to 2 days before and after application; (3) do not apply if rainfall is expected within 24 hours; nor should lawns be irrigated (watered) for 24 hours following application. Reseed no sooner than three to four weeks after application of this product. Failure to observe all precautions may result in injury to turf and/or susceptible plants. The suitable use of this product on non-recommended turf species may be determined by treating a small area at any rate/acre which does not exceed 3 pints/acre. The treated area should be observed for any sign of turf injury for a period of 30 days of normal growing conditions to determine the phytotoxicity and efficacy to the treated area.

This product can be mixed with some liquid fertilizers or liquid iron materials. Because liquid fertilizer and liquid iron differ in pH, free ammonia content, density, salt concentration and percentage of water, a compatibility test is recommended prior to mixing in application equipment. All regulations, either State or Federal, relating to the application of liquid fertilizers or liquid iron and this product must be strictly followed.

WEEDS CONTROLLED BY ESCALADE™ LOW ODOR

Alder	Burweed	False sunflower	Jewelweed
Annual yellow sweet clover	Buttercup	Fiddleneck	Jimsonweed
Artichoke	Canada thistle	Field bindweed	Kochia
Aster	Carolina geranium	Field pansy	Knawe
Austrian fieldcress	Carpetweed	Flea bane (daisy)	Knotweed
Bedstraw	Catchweed bedstraw	Flixweed	Lambsquarter
Beggartick	Catsear	Florida betony	Lespedeza
Biden	Catnip	Florida pusley	Locoweed
Bindweed	Chickweed	Frenchweed	Lupine
Bird vetch	Chicory	Galinsoga	Mallow
Bitterweed	Cinquefoil	Garlic mustard	Marshelder
Bitter wintercress	Clover	Goathead	Matchweed
Black-eyed Susan	Cockle	Goatsbeard	Mexicanweed
Black medic	Cocklebur	Goldenrod	Milk vetch
Black mustard	Coffebean	Ground ivy	Milkweed bloodflower
Blackseed plantain	Coffeeweed	Gumweed	Mugwort
Blessed thistle	Common chickweed	Hairy bittercress	Morningglory
Blue lettuce	Common mullein	Hairy fleabane	Mousear chickweed
Blue vervain	Common sowthistle	Hawkweed	Musk thistle
Box elder	Corn Chamomile	Heatali	Mustard
Bracted plantain	Creeping jenny	Heartleaf drymary	Narrowleaf plantain
Brassbuttons	Crimson clover	Hedge bindweed	Narrowleaf vetch
Bristly oxtongue	Croton, Cudweed	Hedge mustard	Nettle
Broadleaf dock	Curly dock	Hemp	Nutgrass
Broadleaf plantain	Curly indigo	Henbit	Orange hawkweed
Broomweed	Dandelion	Hoary cress	Oxalis
Buckhorn	Dead nettle	Hoary plantain	Oxeye daisy
Buckhorn plantain	Dock, Dogbane	Hoary vervain	Parsley-piert
Bulbous buttercup	Dogfennel	Honeysuckle	Parsnip
Bull nettle	Elderberry	Hop clover	Pearlwort
Bull thistle	English daisy	Horsenettle	Pennycress
Burdock	Fall dandelion	Horsetail	Pennywort
Burning nettle	False dandelion	Indiana mallow	Peppergrass
Bur ragweed	False flax	Ironweed	Pepperweed

WEED CONTROLLED (Continued)

Pigweed	Russian pigweed	Strawberry clover	White mustard
Pineywoods bedstraw	Russian thistle	Sumac	Wild mustard
Plains coreopsis	St. Johnswort	Sunflower	Wild aster
Plantain	Scarlet pimpernel	Sweet clover	Wild buckwheat
Poison hemlock	Scotch thistle	Tall nettle	Wild carrot
Poison ivy	Sheep sorrel	Tall vervain	Wild four-o'clock
Poison oak	Shepherdspurse	Tansy mustard	Wild garlic
Pokeweed	Slender plantain	Tansy ragwort	Wild geranium
Poorjoe	Smallflower galinsoga	Tanweed	Wild lettuce
Povertyweed	Smartweed	Tarweed	Wild marigold
Prairie	Smooth dock	Thistle	Wild onion
Prickly lettuce	Smooth pigweed	Tick trefoil	Wild parsnip
Prickly sida	Sneezeweed	Toadflax	Wild radish
Primrose	Southern wild rose	Trailing crownvetch	Wild rape
Prostrate knotweed	Sowthistle	Tumble mustard	Wild strawberry
Prostrate pigweed	Spanishneedle	Tumble pigweed,	Wild sweet potato
Prostrate spurge	Spatterdock	Tumbleweed	Wild vetch
Prostrate vervain	Speedwell	Velvet leaf	Willow
Puncture vine	Spiny	Venice mallow	Witchweed
Purslane	Spiny amaranth	Veronica	Woolly morningglory
Ragweed	Spiny cocklebur	Vervain	Woodsorrel
Red clover	Spotted catsear	Vetch	Woolly croton
Redroot pigweed	Spotted knapweed	Virginia buttonweed	Woolly plantain
Red sorrel	Spotted spurge	Virginia creeper	Wormseed
Redstem filaree	Spurge	Virginia pepperweed	Yarrow
Rough cinquefoil	Spurweed	Wavyleaf bullthistle	Yellow rocket
Rough fleabane	Stinging nettle	Western clematis	Yellowflower pepperweed
Roundleaved marigold	Stinkweed	Western salsify	and other broadleaf weeds.
Rush	Stitchwort	White clover	

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

ORNAMENTAL LAWNS AND TURF

Apply this product at the rate of 2 to 3 pints in 20 to 240 gallons of water per acre (0.73 to 1.1 fl. oz. in 0.5 to 5.5 gallons of water per 1,000 square feet) to control weeds growing in turf planted to Bluegrass, Fescue, Ryegrass, Bentgrass (excluding golf course greens and tees), Bahia, Bermudagrass and Zoysia.

Note: On closely mowed golf course fairway bentgrass, apply this product at a maximum rate of 2 pints in 20 to 240 gallons of water per acre (0.73 fluid ounces in 0.5 to 5.5 gallons of water per 1000 sq. ft.). During conditions which promote turf stress use lower rates, 1 to 1-1/2 pints in 20 to 240 gallons of water, per acre (0.36 to 0.55 fluid ounces in 0.3 to 5.5 gallons per 1000 sq. ft.). Slight turf yellowing will disappear after one week. To minimize grass injury, a second application should not be made for at least 4 weeks. Avoid swath overlaps. Do not use on golf course greens or tees.

Controlled Droplet Applicators: (CDA), Atomizers, and Spinning Disk Applicators: Use This product at the rate of 2 to 3 pints per acre (0.73 to 1.10 fluid ounces per 1,000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment).

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

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

SOD FARMS

This product is intended for use on sod farms. This herbicide provides selective broadleaf control in warm season and cool season turfgrass established for commercial sod production.

Timing

Apply this herbicide to broadleaf weeds that are actively growing. Follow-up applications may be required for dense infestations of perennial and biennial weeds. Do not apply this product to Floratam St. Augustinegrass.

The application of this herbicide to grass seedlings is recommended after the second mowing.

The application of this product to newly sodded, sprigged, or plugged grasses should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations. Also, applications to dormant bermudagrass, dormant zoysiagrass and dormant bahiagrass are suggested.

Recommended Rates for Sod Farms

For Bluegrass, Ryegrass and Fescue, apply 2 to 3 pints per acre. For Creeping Bentgrass use 1.25 pints per acre. For Common

and Hybrid Bermudagrass, Bahia, Zoysia and St. Augustine grass apply 1.5 to 1.8 pints per acre. Spray volume for Sod Farm application is 5 to 175 gallons per acre.

Generally, the lower application rates will provide satisfactory control of sensitive weeds. The higher application rates will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds beyond the appropriate growth stages.

NON-TURF AREAS

Roadsides (including aprons and guardrails), rights-of-way, and other similar non-crop areas: For control of broadleaf weeds, mix at a rate of .25 to .625 gallons of this product per 50 to 300 gallons of water. This mixture will cover 43,500 square feet. Thoroughly saturate all weeds with spray mixture. Apply any time between the time when plants come into full leaf (Spring) to when the plants begin to go dormant. Best results are obtained when weeds are young and actively growing. Do not cut weeds until herbicide has translocated throughout the plant causing root death. For small broadleaf weeds, use the lower rate. Heavy, dense stands require the higher rate with high water volume. For small (spot) applications with small tank sprayers, apply at the rate of 2-1/2 ounces of this product per gallon of water and spray to thoroughly wet all foliage.

For control of woody plants, apply to both stems and foliage any time from the time foliage is completely matured until the time plants start to go dormant. All leaves, stems and suckers must be completely wet to the ground line for effective control. Regrowth may be anticipated on the more resistant species. Add .5 to .625 gallons of this product to 100 gallons of water applying 200 to 600 gallons of spray mixture per 43,500 square feet depending upon the height and thickness of the brush. Mix thoroughly before spraying.

COMPATIBILITY

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

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

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Store at temperatures above 32° F. If allowed to freeze, remix before using. This does not alter this product. Containers should be opened in well ventilated areas. Keep container tightly sealed when not in use. Do not stack cardboard cases more than two pallets high. Do not store near open containers of fertilizer, seed or other pesticides. 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 groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). 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.

CONTAINER DISPOSAL FOR REFILLABLE CONTAINERS: Close all openings and replace all caps. Contact Nufarm Customer Service at 1-800-345-3330, to arrange for return of the empty refillable container.

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 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.

(RV120904)

Escalade is a Trademark of Nufarm Americas Inc.
Riverdale is a Registered Trademark of Nufarm Americas Inc.



9/9
Nufarm Americas, Inc.
Jeannie K. Smith
Vice President
Registrations & Regulatory Affairs
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527
Phone: 708.755-7332 Fax: 708.754.0314
jeannie.smith@us.nufarm.com

December 22, 2004

Via Overnight Courier

Document Processing Desk (NOTIF)
Office of Pesticide Programs 7504C
US Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Subject: **Riverdale Escalade® Low Odor**
EPA Reg. No. 228-416

Enclosed are the following items to support our request for a notification change:

1. EPA Application Form 8570-1 with PRN 98-10 Certification
2. Two (2) Copies of Amended Labeling

Our original submission contained mathematical errors in the pounds/gallon description on the front page. This notification correctly states the values. Let me know if you have any questions or concerns. Thank you.

Regards,

A handwritten signature in black ink that reads 'Jeannie Smith'.

Jeannie K. Smith
Vice President
Registrations & Regulatory Affairs

