



228-424

12-15-2004

1/8

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 228-424	2. EPA Product Manager Joanne Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Riverdale Horsepower Concentrate	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 DEC 15 2004
<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.)

A section was added to page 3 of the label for "How to Use the Ready-Spray System".

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:					
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		2. Type of Container <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 <input type="checkbox"/>	
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 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.		8. Date Application Received (Stamped)
2. Signature <i>Jeannie Smith</i>	3. Title	
4. Typed Name Jeannie Smith	5. Date December 3, 2004	

2/8

(Residential Label)

Riverdale[®]

HORSEPOWER[®] CONCENTRATE

FOR SELECTIVE BROADLEAF WEED CONTROL
IN RESIDENTIAL TURF

CONTAINS MCPA, TRICLOPYR AND DICAMBA

KILLS: Dandelion, Clover, Chickweed, Oxalis, Ground Ivy, Wild Violet
and [many] [Over 240] other tough lawn weeds.

One quart covers 10,000 sq. ft.

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	13.72%
Triethylamine Salt of 3,5,6-Trichloro-2-Pyridinyloxyacetic Acid**	1.56%
Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***	1.35%

OTHER INGREDIENTS:	83.37%
TOTAL:	100.00%

By Isomer Specific Method, Equivalent to:

*2-Methyl-4-Chlorophenoxyacetic Acid	11.20%, 0.970 lbs./gal.
**3,5,6-Trichloro-2-Pyridinyloxyacetic Acid	1.12%, 0.097 lbs./gal.
***3,6-Dichloro-o-Anisic Acid	1.12%, 0.097 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 SIDE PANELS FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 228-424

NET CONTENTS

GALS.

EPA EST. NO. 228-IL-1

NOTE: Spanish language is optional

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

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

Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles, face shield or safety glasses when mixing, pouring this concentrate from one container to another and when removing or reattaching container closure/spray nozzle. After product has been diluted in accordance with Directions for Use, eye protection is not required. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

(Optional: Re-entry icon) Do not allow people (other than applicator) or pets on treatment area during application. People and pets may enter treated area after spray has dried.

FIRST AID STATEMENT

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

IF IN EYES: 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: 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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. When cleaning equipment, do not pour 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 water used for irrigation or domestic purposes.

Most cases of ground water contamination involving phenoxy herbicides such as MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling these phenoxy pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and transferring this pesticide will reduce the probability of spills. Placement of 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.

Horsepower Concentrate is for use on Residential Turf. **IMPORTANT:** For use on Bluegrass, Fescues, Rye, Bent, Bermuda, Bahia and Zoysia Lawns. Avoid application to St. Augustine or Centipede lawns unless injury can be tolerated. (Do not use on St. Augustine and Centipede lawns). Do not spray Carpet grass, Dichondra or desirable clovers. May cause temporary yellowing of some Bermudagrass turf. Do not exceed specified dosages for any area. Be particularly careful applying within the drip line of trees and other ornamental species. Avoid contact with exposed feeder roots of ornamentals and trees.

LAWN WEED CONTROL

When used as directed kills weeds in your lawn - won't harm lawn grasses.

OR

When used as directed kills broadleaf weeds in lawns - roots and all. Kills weeds - not lawn grasses.

WEEDS [illustration]

Alder, Annual yellow sweet clover, Artichoke, Aster, Austrian fieldcress, Bedstraw, Beggartick, Bident, Bindweed, Bird vetch, Bitterweed, Bitter wintercress, Black-eyed Susan, Black medic, Black mustard, Blackseed pantain, Blackseed plantain, Blessed thistle, Blue lettuce, Blue vervain, Box elder, Bracted plantain, Brassbuttons, Bristly oxtongue, Broadleaf dock, Broadleaf plantain, Broomweed, Buckhorn, Buckhorn plantain, Bulbous buttercup, Bull nettle, Bull thistle, Burdock, Burning nettle, Bur ragweed, Burweed, Buttercup, Canada thistle, Carolina geranium, Carpetweed, Catchweed bedstraw, Catsear, Catnip, Chickweed, Chicory, Cinquefoil, Clover, Cockle, Cocklebur, Coffeebean, Coffeeweed, Common chickweed, Common mullein, Common sowthistle, Corn chamomile, Creeping jenny, Crimson clover, Croton, Cudweed, Curly dock, Curly indigo, Dandelion, Dead nettle, Dock, Dogbane, Dogfennel, Elderberry, English daisy, Fall dandelion, False dandelion, False flax, False sunflower, Fiddleneck, Field bindweed, Field pansy, Flea bane (daisy), Flixweed, Florida betony, Florida pusley, Frenchweed, Galinsoga, Garlic mustard, Goathead, Goatsbeard, Goldenrod, Ground ivy, Gumweed, Hairy bittercress, Hairy fleabane, Hawkweed, Healall, Heartleaf drymary, Hedge bindweed, Hedge mustard, Hemp, Henbit, Hoary cress, Hoary plantain, Hoary vervain,

Honeysuckle, Hop clover, Horsenettle, Horsetail, Indiana mallow, Ironweed, Jewelweed, Jimsonweed, Kochia, Knawel, Knotweed, Lambsquarter, Lespedeza, Locoweed, Lupine, Mallow, Marshelder, Matchweed, Mexicanweed, Milk vetch, Milkweed bloodflower, Mugwort, Morningglory, Mousear chickweed, Musk thistle, Mustard, Narrowleaf plantain, Narrowleaf vetch, Nettle, Orange hawkweed, Oxalis, Oxeye daisy, Parsley-piert, Parsnip, Pearlwort, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Pineywoods bedstraw, Plains coreopsis, Plantain, Poison hemlock, Poison ivy, Poison oak, Pokeweed, Poorjoe, Povertyweed, Prairie, Prickly lettuce, Prickly sida, Primrose, Prostrate knotweed, Prostrate pigweed, Prostrate spurge, Prostrate vervain, Puncture vine, Purslane, Ragweed, Red clover, Redroot pigweed, Red sorrel, Redstem filaree, Rough cinquefoil, Rough fleabane, Roundleafed marigold, Rush, Russian pigweed, Russian thistle, St. Johnswort, Scarlet pimpernel, Scotch thistle, Sheep sorrel, Shepherdspurse, Slender plantain, Smallflower galinsoga, Smartweed, Smooth dock, Smooth pigweed, Sneezeweed, Southern wild rose, Sowthistle, Spanishneedle, Spatterdock, Speedwell, Spiny, Spiny amaranth, Spiny cocklebur, Spotted catsear, Spotted knapweed, Spotted spurge, Spurge, Spurweed, Stinging nettle, Stinkweed, Stitchwort, Strawberry clover, Sumac, Sunflower, Sweet clover, Tall nettle, Tall vervain, Tansy mustard, Tansy ragwort, Tanweed, Tarweed, Thistle, Tick trefoil, Toadflax, Trailing crownvetch, Tumble mustard, Tumble pigweed, Tumbleweed, Velvet leaf, Venice mallow, Veronica, Vervain, Vetch, Virginia buttonweed, Virginia creeper, Virginia pepperweed, Wavyleaf bullthistle, Western clematis, Western salsify, White clover, White mustard, Wild mustard, Wild aster, Wild buckwheat, Wild carrot, Wild four-o'clock, Wild garlic, Wild geranium, Wild lettuce, Wild mangold, Wild onion, Wild parsnip, Wild radish, Wild rape, Wild strawberry, Wild sweet potato, Wild vetch, Willow, Witchweed, Woolly morningglory, Woodsorrel, Wooly croton, Wooly plantain, Wormseed, Yarrow, Yellow rocket, Yellowflower pepperweed, and other broadleaf weeds.

HOW TO USE THE READY-SPRAY® SYSTEM	
(illustrations)	Connect <ol style="list-style-type: none"> 1. Shake well before using. 2. Connect sprayer to hose. 3. Turn on water.
	Spray <ol style="list-style-type: none"> 1. To begin spraying, point nozzle in the direction you want to spray. 2. Bend small yellow plastic tab on side of sprayer back and turn knob clockwise to ON position. 3. Spray evenly over measured area.
	Finish <ol style="list-style-type: none"> 1. To stop spraying, bend small yellow plastic tab back and turn knob counter clockwise to OFF position. 2. Turn off water. 3. Relieve water pressure by bending plastic tab back and turning knob to ON position until water slows to drip. Then, turn knob back to OFF position. 4. Disconnect sprayer from hose.

AMOUNT TO USE	For Northern Lawns (grasses): Fescues, Kentucky Bluegrass, Perennial Rye & Zoysia: 4 fl. oz. per 1 gal. of water for each 1,000 sq. ft.
	For Southern Lawns (grasses): Bermuda, Bahia & Bent (Do not use on Centipede & St. Augustine): 2 fl. oz. per 1 gal. of water for each 1,000 sq. ft.

(If you are unsure of your lawn type) (Use the map to determine which lawn types are most common in your area). ([color]=Fescues, Kentucky Bluegrass, Perennial Rye & Zoysia). ([color] = Bermuda, Bahia & Bent). (If you are unsure of your lawn type, contact your local county extension service before applying.)

MIXING INSTRUCTIONS

1 Tablespoon (Tbs.) = 3 teaspoons (tsp.), 1 fl. oz. = 2 Tbs.

<p>(For (on) Northern Lawns (grasses))</p> <ul style="list-style-type: none"> • <u>Fescues, Kentucky Bluegrass, Perennial Rye & Zoysia</u> Amount to Use: When using a tank sprayer, use 4 fl. oz. per gallon of water for each 1,000 sq. ft. [icon] When using (Name of Sprayer): Set dial to 4 oz. Add 20 fl. oz. to sprayer jar. DO NOT ADD WATER. Spray evenly over 5,000 sq. ft. There's no waste! Any unused product should be poured back into its original container.
<p>(For (on) Southern Lawns (grasses))</p> <ul style="list-style-type: none"> • <u>Bermuda, Bahia & Bent (Do not use on Centipede & St. Augustine)</u> Amount to Use: When using a tank sprayer, use 2 fl. oz. per 1 gallon of water for each 1,000 sq. ft. [icon] When using (Name of Sprayer): Set dial to 2 oz. Add 10 fl. oz. (40 Tbs.) to sprayer jar. DO NOT ADD WATER. Spray evenly over 5,000 sq. ft. There's no waste! Any unused product should be poured back into its original container.

(Optional Directions for Hose-End Sprayer)

5/8

AMOUNT TO SPRAY	
[walking man icon]	<ul style="list-style-type: none"> • Measure lawn. Calculate square feet by multiplying length times width. • Use the amount indicated for your lawn variety.
(For (on) Northern Lawns (grasses))	
<ul style="list-style-type: none"> • <u>Fescues, Kentucky Bluegrass, Perennial Rye & Zoysia</u> 16 fl. oz. (1/2 bottle) treats 4,000 sq. ft. 	
(For (on) Southern Lawns (grasses))	
<ul style="list-style-type: none"> • <u>Bermuda, Bahia & Bent, (Do not use on Centipede & St. Augustine)</u> 16 fl. oz. (1/2 bottle) treats 8,000 sq. ft. 	

[END Optional use directions for (Brand Name) Hose-End Sprayer]

FOR BEST RESULTS

MEASURE

[icon/walking man]

- To treat entire lawn (broadcast application): Use a tank sprayer or hose-end sprayer. Measure lawn. Calculate square feet by multiplying length times width. Spray evenly over measured area.
- To spot treat individual lawn weeds: Use a tank sprayer and spray to wet weeds. To reduce spray drift, adjust sprayer nozzle to deliver a coarse spray.

MOW

[illustration]

- Do not mow for 1 to 2 days before or after application.

WATER

[illustration]

- If soil is dry, water before application.
- Rain or watering 1 hour after application will not wash away effectiveness.

WHEN TO APPLY

[illustration]

- Spray when weeds are actively growing.
- [Spray when] temperature is below 90°F.
- Spray when air is calm to avoid drift to vegetables, flowers, ornamental plants, trees, shrubs and other desirable plants.
- Do not apply to newly seeded grasses until well-established (they have been mowed 3 times).
- Reseed no sooner than 3 weeks after application.

STORAGE AND DISPOSAL

STORAGE: To be stored in original container and placed in an area inaccessible to children.

DISPOSAL: If empty - Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled** - If product cannot be used as directed, call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

Questions, Comments or Medical Information

Call 1-800-XXX-XXXX www.XXXXX.com

The Seller's Guarantee

If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

NOTICE: Buyer assumes all risks of use, storage and handling of this product not in strict accordance with directions given herewith.

(RV 120204)

Riverdale and Horsepower are registered trademarks of Nufarm Americas Inc.

OPTIONAL TEXT

USE PRECAUTIONS – This section is optional

Do not pour spray solutions near desirable plants. Avoid fine mists. Maximum kill (or control) of weeds will be obtained from Spring or early Fall applications when weeds are actively growing.

The suitable use of Horsepower Concentrate on non-recommended turf species may be determined by treating a small area at any rate/sq. ft. which does not exceed 3 pints/12,000 sq. ft. Prior to treatment of larger areas, 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. The user assumes the responsibility for any plant damage or other liability resulting from the use of this product on species not recommended on this label.

For optimum results: (1) avoid applying during excessively dry or hot periods unless irrigation is used; (2) avoid applying if rainfall is expected within 24 hours, nor should lawns be irrigated (watered) for 24 hours following application. Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse for other sprays.

APPENDIX

Formula Claims: These claims may be presented on the retail container label or on the labeling accompanying the product.

APPENDIX

- ◊ Kills weeds - not lawns.
- ◊ For a beautiful Weed-Free Lawn
- ◊ Use [Product Name] to control weeds everywhere around [or in] your lawn.
- ◊ Kills broadleaf weeds in your lawn.
- ◊ Ideal for spot treating individual lawn weeds.
- ◊ Rain proof in hours
- ◊ New Formula
- ◊ Can be used on all cool season [turf] [grass] [lawns].
- ◊ Guaranteed [Results]
- ◊ Kills weeds the first time, every time, guaranteed.
- ◊ Guaranteed not to harm the lawn.
- ◊ Kills to the root so weeds don't [won't] ever come [grow] back.
- ◊ Formerly [Product Name]
- ◊ Complete [total] root [weed] kill
- ◊ Kills all major [common] broadleaf weeds
- ◊ Complete kill [root kill] [weed kill]
- ◊ Kills [even] hard to control [kill] weeds
- ◊ Kills even tough [the toughest] [lawn] weeds [to the root]
- ◊ Won't harm lawns, when used as directed.
- ◊ Total root kill
- ◊ Kills [dandelions] [chickweed] [clover] [ground ivy] [creeping Charlie] [oxalis] [wild violet] [poison ivy] [poison oak] [over 250] and other [over 240 other] tough [lawn] weeds [tough [lawn] weeds].
- ◊ Kills over 250 [tough][lawn] weeds
- ◊ [Product Name] singles out weeds leaves grass alone [unharmed].
- ◊ Targets weeds, leaves grass [the lawn] unharmed.
- ◊ Made [scientifically formulated] [special formula] for use on lawns.
- ◊ New
- ◊ Now
- ◊ Helps keep lawn[s] healthy and weed-free.
- ◊ How it works: [Product Name] contains an exclusive blend of ingredients scientifically proven to kill even the toughest lawn weeds down to the roots. And its revolutionary formula won't kill [harm] your lawn [grass] – guaranteed! [Best of all], the killing power [the exclusive ingredients] only work[s] on weeds, so it [Product Name] won't kill [harm] your lawn [grass] – guaranteed!
- ◊ Helps keep[s] the lawn look [ing] beautiful.
- ◊ Great [ideal] for spot treatments
- ◊ Kills the toughest [lawn] weeds, guaranteed.
- ◊ Results [works] with 1 application
- ◊ Tough weed formula
- ◊ Max Kill Formula
- ◊ Kills weeds to the MAX
- ◊ Revolutionary [tough weed] formula
- ◊ [Company Name][our][Product Name] best lawn weed killer [weed killer for lawns] [brush killer]
- ◊ [Company Name] [our] [Product Name] most-effective lawn weed killer [weed killer for lawns] [brush killer]
- ◊ [Company Name] [our] [Product Name] most powerful lawn weed killer [weed killer for lawns] [brush killer]
- ◊ [Company Name] [Product Name] strongest formula [ever]
- ◊ Kills the [entire] root
- ◊ 100% [MAX] root [weed] kill

7/8

- ◇ [Product Name] MAX
- ◇ Guaranteed kill.
- ◇ Tough on weeds. Gentle [easy] on lawns.
- ◇ Easy to use.
- ◇ Just attach hose and spray.
- ◇ Results in 24 hours
- ◇ Overnight results
- ◇ Rain-Proof in 1 hour
- ◇ Treats up to 8,000 sq. ft. [16 oz. size] (at 2 fl. oz./1 Gal/ 1,000 sq. ft. rate)
- ◇ Treats up to 16,000 sq. ft. [32 oz. size] (at 2 fl. oz./1 Gal/ 1,000 sq. ft. rate)
- ◇ Makes up to 8 gallons of spray [16 oz. size] (at 2 fl. oz./1 Gal/ 1,000 sq. ft. rate)
- ◇ Makes up to 16 gallons of spray [32 oz. size] (at 2 fl. oz./1 Gal/ 1,000 sq. ft. rate)
- ◇ New Tough Weed Formula
- ◇ Kills Weeds. Not Lawns
- ◇ 100% Root Kill
- ◇ Results in 24 hours
- ◇ Kills over 250 weeds
- ◇ Results Guaranteed
- ◇ Coverage Claim – “25% More Coverage*” (*vs previous Weed B Gon formula) or “Treats up to 16,000 sq. ft.”



8/8
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 3, 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® Horsepower® Concentrate
EPA Reg. No. 228-424

Enclosed are the following items to support our request for a label change via notification.

- 1. EPA Application Form 8570-1
- 2. Two (2) Copies of Amended Labeling

We have added a section on page 3 of our label entitled, "How to Use the Ready-Spray® System".

Let me know if you have any questions or concerns. Thank you.

Regards,

A handwritten signature in black ink that reads "Jeannie K. Smith".

Jeannie K. Smith
Vice President
Registrations & Regulatory Affairs

