

228-427

4.11.2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION OF PESTICIDES AND
TOXIC SUBSTANCES

Matt Granahan
Regulatory Specialist
Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

APR 11 2007

SUBJECT: Applications for Pesticide Notification – Optional Language/Updated Warranty
Viper® Weed and Feed (18#/5M) EPA Reg. No. 228-412
Application Dated February 16, 2007
✓ Riverdale® Escalade® Weed and Feed (20#/5M) EPA Reg. No. 228-427
Application Dated February 8, 2007

Dear Mr. Granahan:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

<p>United States Environmental Protection Agency Washington, DC 20460</p>	<div style="border: 1px solid black; padding: 2px; display: inline-block;"> <input type="checkbox"/> Registration Amendment </div> <div style="border: 1px solid black; padding: 2px; display: inline-block; margin-top: 2px;"> <input checked="" type="checkbox"/> Other </div>	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 228-427	2. EPA Product Manager Joanne Miller	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Riverdale Escalade Weed & Feed (20#/5M)	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas, Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), 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.

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

Label Notification per PR Notice 98-10, Section II. Amended labeling with label claims as highlighted. 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 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 the 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 section 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 checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* 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 checked="" 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 checked="" type="checkbox"/> Lithograph Paper glued 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 George Meindl george.meindl@us.nufarm.com	Title Registration Manager	Telephone No. (include Area Code) 630.455.2017
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 		
3. Title Registration Manager		
4. Typed Name George Meindl		5. Date 02/08/07



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Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Telephone: (630) 455.2000 Facsimile: (630) 455.2001
www.us.nufarm.com

February 8, 2007

Via Overnight Courier

U. S. Environmental Protection Agency (7504P)
Document Processing Desk (NOTIF)
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Riverdale® Escalade® Weed and Feed (20#/5M) – Commercial and Residential Labels
EPA REG. No. 228-427
Label Notification per PR 98-10

Dear Ms. Hobgood:

Nufarm Americas Inc. would like to add optional language to subject product's label. The proposed language is consistent with PR Notice 98-10, Section II (labeling notifications). We have added the following sentence "The Pro's Choice" and updated our Warranty on the Commercial label and we have updated our Warranty on the Residential label.

To process this request please find enclosed the following:

- Application for Pesticide Registration EPA form 8570-1
- Revised labeling with areas of change clearly identified (1 copy)
- Revised labeling -- clean (1 copy)

If you should have any questions regarding this matter, please feel free to contact me at (630) 455-2048 or matthewgranahan@us.nufarm.com or contact George Meindl at (630) 455-2017 or e-mail at george.meindl@us.nufarm.com.

Sincerely,

A handwritten signature in black ink that reads "Matthew P. Granahan".

Matthew Granahan
Regulatory Specialist
Nufarm Americas, Inc.

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NOTIFICATION

APR 11 2007

(Residential)

RIVERDALE®

ESCALADE® WEED & FEED

20 lbs/5M

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE AND TURF FOOD COMBINATION WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS WHILE PROVIDING BOTH FAST AND LONG FEEDING ACTION.

CONTAINS THE ESTERS OF 2,4-D AND FLUROXYPYR WITH DICAMBA ACID

Weeds contacted by this product gradually die and disappear from the lawn.
Treats (or covers) 5,000 Square Feet (50' x 100')

ACTIVE INGREDIENTS:

Isocetyl (2-ethylhexyl) Ester of 2,4-Dichlorophenoxyacetic Acid*	0.8650%
1-Methylheptyl Ester of Fluroxypyr:((4-amino-3-5-dichloro-6-fluoro-2-pyridinyl)oxy)acetic Acid, 1-methylheptyl Ester **	0.2060%
Dicamba (3,6-Dichloro-o-Anisic Acid)***	0.0717%

OTHER INGREDIENTS:

.....	98.8573%
TOTAL:	100.0000%

Isomer Specific Method, Equivalent to:

*2,4-Dichlorophenoxyacetic Acid	0.5740%
**((4-amino-3-5-dichloro-6-fluoro-2-pyridinyl)oxy)acetic Acid	0.1430%
***3,6-Dichloro-o-Anisic Acid	0.0717%

GUARANTEED ANALYSIS:

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P2O5)	X%
Soluble Potash(K2O)	X%
Primary Plant Foods derived from (List sources).	
Chlorine (Cl) Maximum	X%
The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.	
Fertilizer guaranteed by (Name of Fertilizer registrant)	

DO NOT SELL, DISTRIBUTE OR USE THE PRODUCT IN NASSAU AND SUFFOLK COUNTY IN NEW YORK.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL 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. 228-427
EPA EST. NO. 228-IL-1

MANUFACTURED BY
NUFARM AMERICAS INC.
BURR RIDGE, IL 60527



NET WEIGHT 20 LBS.
000228-00427.20070208.

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

Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. 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 dust has settled.

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 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 non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

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 product is a stable mixture of three herbicides. It is for use on residential turf.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product when desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth in lawns and control many broadleaf weeds such as:

- | | | | |
|----------------------------|--------------------|-------------------|-------------------|
| Alder | Bracted plantain | Catsear | Dandelion |
| Annual yellow sweet clover | Brassbuttons | Catnip | Dead nettle |
| Artichoke | Bristly oxtongue | Chickweed | Dock |
| Aster | Broadleaf dock | Chicory | Dogbane |
| Austrian fieldcress | Broadleaf plantain | Cinquefoil | Dogfennel |
| Bedstraw | Broomweed | Clover | Elderberry |
| Beggartick | Buckhorn | Cockle | English daisy |
| Biden | Buckhorn plantain | Cocklebur | Fall dandelion |
| Bindweed | Bulbous buttercup | Coffebean | False dandelion |
| Bird vetch | Bull nettle | Coffeeweed | False flax |
| Bitterweed | Bull thistle | Common chickweed | False sunflower |
| Bitter wintercress | Burdock | Common mullein | Fiddleneck |
| Black-eyed Susan | Burning nettle | Common sowthistle | Field bindweed |
| Black medic | Bur ragweed | Corn Chamomile | Field pansy |
| Black mustard | Burweed | Creeping jenny | Flea bane (daisy) |
| Black-seed plantain | Buttercup | Crimson clover | Flixweed |
| Blessed thistle | Canada thistle | Croton | Florida betony |
| Blue lettuce | Carolina geranium | Cudweed | Florida pusley |
| Blue vervain | Carpetweed | Curly dock | Frenchweed |
| Box elder | Catchweed bedstraw | Curly indigo | Galinsoga |

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

WHEN TO APPLY: Best results are obtained when weeds are growing actively in spring or early fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain, sprinkling or dew); (3) Avoid unnecessary disturbances, including water of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration on Centipede and St. Augustinegrasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 20 pound bag should be used on 5,000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is also acceptable.

The following settings are approximate for applying contents of this package at a suggested rate of 4 lbs. per 1,000 square feet. These settings are furnished only as a guide. Age, spreader condition, operating speed, and unevenness of terrain can cause variation in applied rates. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 1 lb. per 250 square feet.

SPREADER SETTINGS ONE PASS APPLICATION:*	MAKE	SETTING
	Central Calibrated	5
	Cyclone Broadcast	3-3/4
	Jackson	5
	Sears Broadcast	3
	Sears	5
	Scotts Calibrated	4

Sweep (do not wash) all fertilizer materials from surfaces immediately after application, because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

(The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 pound of nitrogen/1,000 square feet; otherwise, this information is optional.)

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing (No. of lbs.) pounds of nitrogen per 1,000 square feet (optional P₂O₅ and K₂O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

*Based on Inert fertilizer claimed.

Environmental Benefits

(Grasscycling Logo)

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.

- ✓ A 50' x 50' lawn produces enough oxygen for a family of 4 every day
- ✓ Reduces Glare & Reduces Noise
- ✓ Traps Dust, Smoke Particles & Other Pollutants
- ✓ Purifies Water & Modifies Temperature
- ✓ Improves Soil Condition & Controls Erosion

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Always use original container to store pesticides and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals. To prevent cross-contamination, do not store near open containers of fertilizer, seed or other pesticides. Do not stack more than two pallets high.

PESTICIDE 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.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW. MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS

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If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV020807N)

Riverdale and Escalade are Registered Trademarks of Nufarm Americas Inc.

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.

(Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

The following note will not be part of the actual label copy.

*NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. Chlorine declaration is optional except where mandated by State fertilizer regulation.

OPTIONAL LANGUAGE:

This formulation contains a low-volatile ester; however, use with caution around or near susceptible crops or desirable plant species, especially in weather above 85 degrees.

OPTIONAL LABEL LANGUAGE FOR DIFFERENT BAG SIZES:

XX pound bag should treat up to XX,XXX square feet.