

83100-8

01/24/2008

9A 3-3

1/32



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JAN 24 2008

Dr. Frank E. Sobotka, Ph.D
Product Registration
Rotam Agrochemical Company Limited
c/o IPM Resources LLC
660 Newtown-Yardley Rd., Suite 105
Newtown, PA 18940

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Primary Brand Name Change "PRIMERO Agricultural Herbicide"
EPA Reg. No. 83100-8
Application Dated December 13, 2007

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 12/13/7 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in cursive script that reads "Sheradab Hobgood".

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number ROTAM AGROCHEMICAL COMPANY LIMITED	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Primero Agricultural Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Rotam Agrochemical Company Limited C/O IPM Resources LLC 660 Newtown-Yardley Rd., Suite 105 Newtown, PA 18940 <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.

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

Notification of a change in Primary Brand Name (EPA Reg. No.: 83100-8).

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 checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon		5. Location of Label Directions <input checked="" 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 Frank Sobotka, Ph.D.	Title Agent	Telephone No. (Include Area Code) 215 497-9501
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 Agent	
4. Typed Name Frank Sobotka, Ph.D.	5. Date December 13, 2007	

3 | 32

IPM Resources LLC

660 Newtown-Yardley Rd., Suite 105, Newtown, PA 18940 Phone: 215 497-9501 FAX: 215 497-9502

"an intellectual property management resources company"

December 14, 2007

VIA DHL EXPRESS

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
Attention: Jim Tompkins PM25

Subject: NOTIFICATION of Change in Primary Brand Name
Rotam Nicosulfuron 75 WG Agricultural Herbicide (EPA Reg. No.: 83100-8)

Dear Mr. Tompkins:

This submission is to provide NOTIFICATION to the Agency of change in Primary Brand Name for the above subject product.

The New Primary Brand Name for the product is as follows:

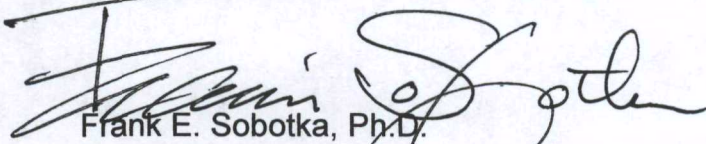
PRIMERO™ Agricultural Herbicide

Attached to this correspondence are copies of the following documents:

- 1) EPA Form 8570-1
- 2) NOTIFICATION Certification Statement
- 3) Two (2) Copies of Revised labeling

If you have any questions concerning this Notification please contact me direct at Ph: 215 497-9501 or by email at frank_sobotka@msn.com .

Sincerely yours,


Frank E. Sobotka, Ph.D.
Senior Partner
IPM Resources LLC (Agent)



[Front Container Label/Optional if booklet is used as front Container Label]

4/32

PRIMERO™

Agricultural Herbicide

For use on Corn

Active Ingredient:	By weight
Nicosulfuron* 2-[[[(4,6-dimethoxypyrimidin-2-yl)aminocarbonyl]aminosulfonyl]-N,N-dimethyl-3-pyridinecarboxamide	75%
Inert Ingredients:.....	25%
TOTAL.....	100%

Contains 75% Technical Active ingredient by weight.
*CASRN: 111991-09-4

EPA Reg. No.: 83100 – 8

EPA EST. No.: 069821-CHN-003

Keep Out of the Reach of Children

CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. If you do not understand this label, find someone to explain it to you in detail.

FIRST AID

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 eye. 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.

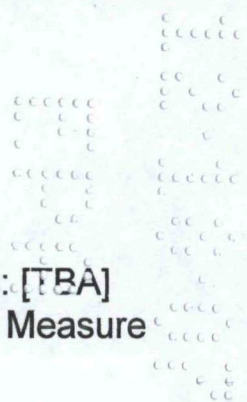
IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Note to Physican: No specific antidote. Treat symptomatically.
For Emergency Medical treatment call your local poison control center.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

See additional Precautionary Statements on Inside Booklet and Back Panel of Container and Directions for Use on Inside Booklet.

Manufactured by:
Rotam Agrochemical Company Limited
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong

Net Contents: [TBA]
US Standard Measure



PRIMERO™ Agricultural Herbicide
[Booklet (Cover first 2 pages)]

PRIMERO™

Agricultural Herbicide

For use on Corn

Active Ingredient:	By weight
Nicosulfuron* 2-[[[(4,6-dimethoxypyrimidin-2-yl)aminocarbonyl]aminosulfonyl]-N,N-dimethyl-3-pyridinecarboxamide	75%
Inert Ingredients:.....	25%
TOTAL.....	100%

Contains 75% Technical Active ingredient by weight.

*CASRN: 111991-09-4

EPA Reg. No.: 83100 – 8

EPA EST. No.: 069821-CHN-003

KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. If you do not understand this label, find someone to explain it to you in detail.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing.

FIRST AID

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

Note to Physician: No specific antidote. Treat symptomatically.

For Emergency Medical treatment call your local poison control center.

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

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.

ENVIRONMENTAL HAZARDS

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 contaminate water when cleaning equipment or disposing of equipment washwaters or rinseate.

PERSONAL PROTECTIVE EQUIPMENT

Some material that are chemical resistant to this product are listed below. If you want more options follow the instructions for Category A on the EPA chemical resistance category selection chart.

- Long-sleeved shirt and long pants.
- Chemical resistant gloves Category A (such as butyl rubber, natural rubber, neoprene rubber, or nitrile rubber), all > 14 mils.
- Shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with The Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

See additional Precautionary Statements and Directions for Use on Inside Booklet.

Manufactured by:
Rotam Agrochemical Company Limited
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong

Net Contents: [TBA]
US Standard Measure

[page numbers TBA]

TABLE OF CONTENTS

PAGE

Directions for Use
General Information
 When to apply
 Normal Planned Use
 Application Timing
 Late or Rescue Application
 Rate
 Spray adjuvants
 Mixing instructions
 Tank mix applications
 Additional recommendations
 Tank mix compatibility testing
 Sequential applications
 Cultivation
 Environmental conditions and biological activity
 Soil insecticide interactions
 Crop rotation
 Application information
 Ground application
 Aerial application
 Sprayer preparation/cleanup
 Spray drift management
 Resistance
 Integrated Pest Management
Important precautions
Storage and Disposal
Warranty

PRIMERO™ Agricultural Herbicide

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

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 R 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 4 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.
- Chemical resistant gloves Category A (such as butyl rubber, natural rubber, neoprene rubber, or nitrile rubber), all > 14 mils.
- Shoes plus socks.

PRIMERO Agricultural Herbicide should be used only in accordance with recommendations on this label. Rotam Agrochemical Company Ltd will not be responsible for losses or damage resulting from use of this product in any manner not specifically recommended by Rotam Agrochemical Company Ltd.

GENERAL INFORMATION

PRIMERO Agricultural Herbicide is a water dispersible granule used at a rate 1/3 - 1 1/3 ounces per acre for selective postemergence grass weed control in field corn grown for seed or grain, popcorn and sweet corn.

Do not make more than two applications of PRIMERO Agricultural Herbicide per cropping season. The combined dosage of sequential applications cannot exceed 1 1/3 ounces per acre of PRIMERO Agricultural Herbicide.

When to Apply

PRIMERO Agricultural Herbicide may be used on field corn, high lysine, waxy, white or other food grade corn hybrids. PRIMERO Agricultural Herbicide may be broadcast to corn up to 20" tall (free standing) or that is exhibiting up to and including 6 leaf collars (V6), whichever is more restrictive.

While PRIMERO Agricultural Herbicide has a wide application window, research has shown best results are obtained when applications are made early postemergence when corn and weeds are small. Target applications to corn that is less than 12" tall for best overall performance.

PRIMERO™ Agricultural Herbicide

Application Timing

Apply PRIMERO Agricultural Herbicide when grasses are young and actively growing, but before they exceed the sizes indicated in Table 1. Treat heavy infestations of weeds before they become too competitive with the crop, especially where soil moisture and/or fertility are limited. PRIMERO Agricultural Herbicide provides weed control via foliar absorption. PRIMERO Agricultural Herbicide only controls those weeds that have emerged. For later-emerging weeds, a second application or a timely cultivation is required. Applications made to weeds larger than the size indicated on this label or to weeds under stress may result in unsatisfactory control (See Late or Rescue Applications below).

Late or Rescue Applications

PRIMERO Agricultural Herbicide may be applied to field corn as a rescue treatment for the control of escaped grasses, or as a directed postemergence application on corn that is taller than 2" or which has more than 6 collars (whichever occurs first).

For corn 20" to 36" tall, apply PRIMERO Agricultural Herbicide with drop nozzles only and avoid spraying into the whorl of corn stalks. Do not apply to corn that is taller than 36" or that exhibits 10 or more collars (V10), whichever is most restrictive. Applications made to weeds larger than those listed on this label may vary from complete control to suppression. Level of control will depend on the weed species, stage of growth, and environmental conditions.

Due to the unplanned nature of rescue applications, choices must be made between the risks that arise from applications made beyond the proper time for ROTAM

NICOSULFURON 75 WG herbicide use, and the effects of season long grass competition and/or harvest complications. These choices must balance risks from improperly timed PRIMERO Agricultural Herbicide use that include, but are not limited to-

- Yield loss due to competition: Research indicates competition from foxtail exceeding 4 inches in height may reduce corn yields. Applications to foxtail and other annual grasses that exceed the sizes stated on the label increases the risk of yield losses due to prolonged competition with the crop even though control may be acceptable.
- Incomplete control of grasses beyond labeled size: Applications to grasses that exceed the labeled sizes can result in reduced control. This incomplete control may reduce corn yield.
- Incomplete grass control due to herbicide stress: Grasses under stress from previous herbicide applications may not be actively growing and susceptible to PRIMERO Agricultural Herbicide. This stress may reduce grass control in "rescue" situations.
- Ear malformation: Applications of PRIMERO Agricultural Herbicide on corn that has 7 to 10 collars (V7 to V10) increases the potential for ear malformation (pinching). This risk may be greatly reduced, but not eliminated, by using drop nozzles properly adjusted so as to not apply ROTAM NICOSULFURON 75 WG herbicide into the corn whorl.

Rate

Optimum control of the weeds listed can be achieved with 2/3 ounces of PRIMERO Agricultural Herbicide. Weeds that exceed the listed weed sizes by up to 50% may be partially controlled with rates between 2/3 and 1 1/3 ounces of

PRIMERO™ Agricultural Herbicide

PRIMERO Agricultural Herbicide per acre. PRIMERO Agricultural Herbicide may be applied at 1/3 - 2/3 ounces for limited control of certain small grass weeds. (See Table 2, under Additional Recommendations for details.)

As weeds mature, their sensitivity to PRIMERO Agricultural Herbicide decreases.

As grassy weeds become mature (more than 3 tillers), they may not reach the size listed below, due to drought or other environmental factors. Grassy weeds that are maturing rapidly should be treated before they reach the stages listed below.

When applied as directed, PRIMERO Agricultural Herbicide will control the weeds listed in Table 1.

Table 1. Weeds controlled with 2/3 ounces PRIMERO Agricultural Herbicide.

Grasses	Maximum Height or Diameter (inches)
Barnyardgrass	4
Broadleaf signalgrass	2
Foxtails (bristly, giant, green, yellow)	4
Itchgrass	6
Johnsongrass	
Seedling	12
rhizome	18
Panicum (Texas, browntop)	3
fall	4
Quackgrass*	10
Rygrass (Italian, perennial)	6
Sandbur (field, logspine)*	3
Shattercane	12
Sorghum alnum	12
Timothy	6
Volunteer cereals (barley, oats, rye, triticale, wheat)	6**
Wild oats	4
Wild proso millet	4
Wirestem muhly*	8
Witchgrass	6
Woolly cupgrass* ¹	4

*Requires the use of COC plus ammonium nitrogen fertilizer.

Cultivation or re-treatment may be required. (See For Additional Control of Later Emerging Grasses.)

**10 inches in the states of WA, OR, ID, and MT, where the use of MSO adjuvants are preferred. (See Spray Adjuvants.)

Broadleaves	Maximum Height or Diameter (inches)
Burcucumber	3

PRIMERO™ Agricultural Herbicide

Dandelion	6
Hemp dogbane*	4
Jimsonweed	3
Morningglory (ivyleaf, pitted)	3
tall	2
Pigweed (redroot, smooth)	4
Smartweeds (ladysthumb, PA)	4
Thistle, Canada*	4

*Suppression

Popcorn, Field Corn Grown for Seed and Sweet Corn

PRIMERO Agricultural Herbicide may be broadcast or applied with drop nozzles to popcorn or field corn grown for seed that is less than 20" tall (free-standing) or that exhibits up to and including 5 leaf-collars

(V5), whichever is most restrictive. Do not apply to corn that is taller than 20" or that exhibits more than 5 leaf-collars (V5), whichever is more restrictive. Many seed companies have tested seed corn inbreds or yellow popcorn hybrids for sensitivity to PRIMERO Agricultural Herbicide and have reported excellent safety. Do not apply PRIMERO Agricultural Herbicide to any white popcorn inbred, or white popcorn hybrid unless specifically approved by the seed company. This includes "White Dynamite" popcorn.

PRIMERO Agricultural Herbicide may be applied to certain sweet corn hybrids grown for fresh markets or under contract for processing. Applications of PRIMERO Agricultural Herbicide may be applied broadcast or with drop nozzles (post-directed) on sweet corn up to 12 inches tall or up to and including 5 leaf-collars (V5). For sweet corn 12 - 18 inches tall, apply only with drop nozzles. Do not apply to sweet corn taller than 18 inches or those which exhibit 6 or more leaf-collars (V6), and make only one application of PRIMERO Agricultural Herbicide per year. Sweet corn hybrid sensitivity to PRIMERO Agricultural Herbicide is highly variable, and not all hybrids have been tested for crop tolerance. Contact your Rotam Sales Representative for information on local sweet corn hybrids that have been evaluated with PRIMERO Agricultural Herbicide.

Not all seed corn inbreds, popcorn or sweet corn hybrids have been tested, nor does Rotam Agrochemical Company Ltd. have access to all seed company data. Consequently, Rotam Agrochemical Company Ltd. is not responsible for any crop injury arising from the use of PRIMERO Agricultural Herbicide on field corn grown for seed, popcorn or sweet corn. When tank mixing, check the tank mix partner label for tolerances and instructions for use.

(See Soil Insecticide Interaction Information regarding the use of PRIMERO Agricultural Herbicide on popcorn, sweet corn or field corn grown for seed that has been previously treated with a soil insecticide.)

SPRAY ADJUVANTS

Applications of PRIMERO Agricultural Herbicide must include either a crop oil concentrate or a nonionic surfactant. In addition, an ammonium nitrogen fertilizer must be used unless specifically prohibited by tank mix partner labeling. Crop oil concentrate plus ammonium nitrogen fertilizer is the preferred adjuvant system for activity on difficult to control species such as woolly cupgrass, quackgrass, sandbur and wirestem muhly. Consult your local Rotam Sales Representative prior to using other adjuvant systems. If another herbicide is tank mixed with PRIMERO Agricultural Herbicide, select adjuvants authorized for use with both products. Products must contain only EPA exempt ingredients (40 CFR 1001).

PRIMERO™ Agricultural Herbicide
Crop Oil Concentrate (COC) - Petroleum or
Modified Seed Oil (MSO)

- Apply at 1% v/v (1 gallon per 100 gallons spray solution) or 2% under arid conditions.
- MSO adjuvants may be used at 0.5% v/v (0.5 gallons per 100 gallons spray solution) if specifically noted on adjuvant product labeling.
- Oil adjuvants must contain at least 80% high quality, petroleum (mineral) or modified vegetable seed oil with at least 15% surfactant emulsifiers.

Nonionic Surfactant (NIS)

- Apply at 0.25% v/v (1 quart per 100 gallons spray solution) or 0.5% under arid conditions.
- Surfactant products must contain at least 60% nonionic surfactant with a hydrophilic/lipophilic balance (HLB) greater than 12.

Ammonium Nitrogen Fertilizer

- Use 2 quarts/acre of a high-quality urea ammonium nitrate (UAN), such as 28%N or 32%N, or 2 pounds/acre of a spray-grade ammonium sulfate (AMS). Use 4 quarts/acre UAN or 4 pounds/acre AMS under arid conditions.
- Do not use liquid nitrogen fertilizer as the total carrier solution.

Special Adjuvant Types

- Combination adjuvant products may be used at doses that provide the required amount of NIS, COC, MSO and/or ammonium nitrogen fertilizer. Consult product literature for use rates and restrictions.
- In addition to the adjuvants specified above, other adjuvant types may be used if they provide the same functionality. Note: not all adjuvant types have been tested with this product. Consult your local Extension Agent or your Rotam Representative if you have questions concerning use of a specific adjuvant product.

MIXING INSTRUCTIONS

1. Fill the tank 1/4 to 1/3 full of water.
2. While agitating, add the required amount of ROTAM NICOSULFURON 75 WG herbicide.
3. Continue agitation until the PRIMERO Agricultural Herbicide is fully dispersed, at least 5 minutes.
4. Once the PRIMERO Agricultural Herbicide is fully dispersed, maintain agitation and continue filling tank with water. Thoroughly mix ROTAM NICOSULFURON 75 WG herbicide with water before adding any other material.
5. As the tank is filling, add the required spray adjuvants (crop oil concentrate, nonionic surfactant, or ammonium nitrogen fertilizer).
6. If the mixture is not continuously agitated, settling will occur. If settling occurs, thoroughly re-agitate before using.
7. Apply PRIMERO Agricultural Herbicide spray mixture within 24 hours of mixing to avoid product degradation.
8. If PRIMERO Agricultural Herbicide and a tank mix partner are to be applied in multiple loads, pre-slurry the PRIMERO Agricultural Herbicide in clean water prior to adding to the tank. This will prevent the tank mix partner from interfering with the dissolution of the PRIMERO Agricultural Herbicide.

WHEN TO APPLY - SEQUENTIAL APPLICATIONS FOLLOWING REDUCED RATES OF PREEMERGENCE HERBICIDES

PRIMERO Agricultural Herbicide may be used as a sequential application in a planned postemergence weed control program in corn following a reduced rate of a preemergence herbicide.

Apply a reduced rate of a preemergence grass herbicide prior to corn emergence and then follow with a postemergence application of PRIMERO Agricultural Herbicide. Apply products such as Cinch®, Cinch® ATZ, Balance PRO, Axiom, Dual II Magnum, Surpass, Outlook™ and Harness Xtra at as low as 1/4 to 1/2 of the full labeled use rate and follow with a sequential postemergence application of PRIMERO Agricultural Herbicide. Refer to the preemergence grass herbicide label for use restrictions, application information, rotational crop guidelines, and follow any caution statements prior to applying PRIMERO Agricultural Herbicide.

Do not apply PRIMERO Agricultural Herbicide to corn that exhibits herbicide injury from previous applications made to the current or preceding crop.

TANK MIX APPLICATIONS

For Additional Control of Broadleaf Weeds

PRIMERO Agricultural Herbicide may be tank mixed with many herbicides registered for postemergence application in corn for additional control of broadleaf weeds. See the tank mix partner label for weeds controlled, precautions, use restrictions, adjuvant and crop rotation information. The most restrictive language on either label shall apply.

In addition to the tank mixtures noted above, PRIMERO Agricultural Herbicide may be tank mixed with the rates of products listed below for improved control of many broadleaf weeds, including cocklebur, dandelion, Eastern black nightshade, lambsquarters, pigweeds, ragweeds, PA smartweed and velvetleaf. (See Additional Recommendations and/or Recommendations For Specific Weed Problems below for additional information.)

<i>Product</i>	<i>Rate/A</i>
Atrazine*	up to 2 lbs a.i.
Dicamba (e.g. Oracle or any 4 lb/gallon dicamba)	2 – 4 fl oz
Dicamba + Atrazine (e.g. Stratos, Marksman)*	8 – 16 fl oz
Callisto	1.5 – 3.0 fl oz
Distinct	1 – 2 oz
Exceed	0.25 – 0.5 oz
Northstar**	2.5 – 5.0 oz

* Make applications to emerged corn before the corn reaches 12" tall.

** Do not apply to sweet corn, seed corn, or popcorn.

Rates listed are for the specific products noted in the table. If other brands or formulations are used, rates of active ingredients should be adjusted to correspond to the products indicated. Formulations of products other than those listed may not have been tested with PRIMERO Agricultural Herbicide. Check with the manufacturer for information on tank mix

PRIMERO™ Agricultural Herbicide

compatibility prior to using (See Tank Mix Compatibility Testing). Crop oil concentrate plus ammonium nitrogen fertilizer is the preferred adjuvant for tank mixtures when using products at the low end of the rate range indicated in the table. The use of nonionic surfactant is permitted in place of crop oil concentrate for tank mixtures containing dicamba, however, overall weed control maybe reduced. (See Spray Adjuvants under Tank Mixtures with Atrazine rate recommendation.)

**Do not use MSO adjuvants when tank mixing
PRIMERO Agricultural Herbicide with >1.5 Ounces Callisto.**

ADDITIONAL RECOMMENDATIONS AND/OR RECOMMENDATIONS FOR SPECIFIC WEED PROBLEMS

Reduced Rates of PRIMERO Agricultural Herbicide PRIMERO Agricultural Herbicide may be applied at 1/3 - 2/3 ounces for control of the small grass weeds noted in the table below. Always use a crop oil concentrate plus ammonium nitrogen fertilizer when applying reduced rates of PRIMERO Agricultural Herbicide.

**Table 2. Weeds controlled with reduced rates of
PRIMERO Agricultural Herbicide.**

Grasses	Maximum Height or Diameter (inches) Rate Rotam Nicosulfuron 75WG herbicide		
	1/3 oz	1/2 oz	2/3 oz
Barnyardgrass	2	3	4
Foxtails (bristly, giant, green)	2	3	4
yellow	-	2	4
Itchgrass	2	4	6
Johnsongrass, seedling	-	8	12
rhizome	-	8	18
Panicum (Texas, browntop)	1	2	3
fall	1	2	4
Sandbur (field, longspine)	-	1	3
Shattercane	3	6	12
Sorghum alnum	3	6	12
Timothy	2	4	6
Volunteer cereals	-	2	6
Wild oats	2	3	4
Wild proso millet	-	2	4
Witchgrass	2	4	6
Woolly cupgrass	-	-	4

Tank Mixtures with Atrazine

PRIMERO Agricultural Herbicide may be tank be with up to 2 pounds a.i. Atrazine* for control of many broadleaf weeds, including:

Broadleaf Weeds	Maximum Height or Diameter (inches)
Sicklepod	2
Prickly sida	2
Wild Radish	12
Cutleaf evening primrose	6
Florida pusley	2

*For best results add 0.25 - 2.0 quarts Atrazine 4L or 4 - 35 ounces Atrazine 90DF. Products containing Atrazine are Restricted Use Products.

ROTAM NICOSULFURON 75 WG + Atrazine tank mixtures may result in reduced control of grasses (antagonism) if applied to if under low moisture stress or to grasses or the to labeled height. Before ROTAM NICOSULFURON 75 WG + Atrazine tank mixtures, refer to the label for information regarding the maximum amount of Atrazine that of be applied in a season.

Tank Mixtures with Callisto

PRIMERO Agricultural Herbicide may be tank mixed with 1.5 - 3.0 fluid ounces/acre of Callisto herbicide for weed control as indicated in the table below:

Species	Maximum Height or Diameter (inches)					
	Callisto alone			Callisto + Atrazine		
	1.5 oz	2.0 oz	3.0 oz	1.5 oz	2.0 oz	3.0 oz
Cocklebur	4	4	4	10	10	10
Dandelion	10	10	10	10	10	10
Jimsonweed	4	4	4	4	10	10
Kochia	-	-	-	4	4	4
Lambsquarters, common	4	4	4	10	10	10
Morningglory, ivyleaf	4	4	4	4	4	4
Mustard, wild	-	-	4	-	-	10
Nightshade, black, eastern black	4	4	4	10	10	10
Pigweed, palmer	-	-	4	4	4	4
Pigweed, redroot, smooth	4	4	4	10	10	10
Ragweed, common	-	-	-	4	10	10
Ragweed, giant	-	3	4	4	10	10
Smartweed, ladysthumb	-	4	4	4	10	10
Smartweed, Pennsylvania	4	4	4	4	10	10
Sunflower, common	4	4	4	4	4	10
Velvetleaf	4	4	4	10	10	10
Waterhemp, tall, & common	-	4	4	4	10	10

*Plus 0.25 to 0.75 pounds a.i. atrazine per acre may provide better control when weeds are at maximum height.

PRIMERO™ Agricultural Herbicide

For improved grass and broadleaf weed control, PRIMERO Agricultural Herbicide tank mixtures with 1.5 ounces Callisto (with or without atrazine) may be applied with 0.5 % v/v MSO spray adjuvant. Do not use MSO adjuvants when tank mixing ROTAM

NICOSULFURON 75 WG herbicide with >1.5 ounces Callisto. Use a petroleum-based crop oil concentration + an ammonium nitrogen fertilizer.

Tank Mixtures with Impact plus Atrazine

PRIMERO Agricultural Herbicide may be tank mixed with 0.5 to 0.75 fluid ounces/acre of Impact herbicide plus Atrazine at 0.375 to 1.5 pounds ai/acre for weed control as indicated in the table below:

Maximum Weed Height (in inches)

PRIMERO Agricultural Herbicide + Atrazine +

Species	Impact 0.5 oz	Impact 0.75 oz**
Amaranth, Palmer	4"*	6"
Cocklebur, common	5"*	8"
Jimsonweed	4"*	6"
Kochia	4"*	6"
Lambsquarter, common	4"	6"
Momingglory, annual	4"	4"
Mustard, wild	4"*	6"
Nightshade, (black	4"*	6"
Pigweed (redroot, smooth)	4"	6"
Ragweed, common	4"	6"
Ragweed, giant	5"	8"
Smartweed, Pennsylvania	2"*	3"
Smartweed, Ladysthumb	2"*	3"
Sunflower, common	5"*	8"
Thistle, Canada	4"S*	6"S
Velvetleaf	5"	8"
Waterhemp, (tall, common)	4"	6"

Suppression.

* Refer to Impact label for additional information regarding tank mixtures, adjuvants and rotational crops. Current research supports applications at these use rates only within the following geographies: Illinois, north of I-80; Iowa, north of I-80 (excluding the area that is both north of U. S. Hwy. 20 and west of U.S. Hwy. 71); Michigan, entire state; Minnesota, east of U.S. Hwy. 71; Nebraska, north of Hwy. 92; Wisconsin, entire state.

** Refer to Impact herbicide label for specific rotational crop information.

PRIMERO™ Agricultural Herbicide

Tank Mixtures with Lumax or Lexar

PRIMERO Agricultural Herbicide may be tank mixed with 2 pints/acre of Lumax or 2 1/3 pints/acre of Lexar herbicide for weed control as indicated in the table below:

Species	Lumax 2 pts	Lexar 2 1/3 pts
Amaranth, Palmer	4"	4"
Cocklebur, common	10"	10"
Dandelion	10"	10"
Jimsonweed	10"	10"
Kochia	4"	4"
Lambsquarter, common	10"	10"
Morningglory, annual	4"	4"
Mustard, wild	4"	10"
Nightshade, (black,	10"	10"
Pigweed (redroot smooth)	10"	10"
Ragweed, common	10"	10"
Ragweed, giant	10"	10"
Smartweed, Pennsylvania	10"	10"
Smartweed, Ladysthumb	10"	10"
Sunflower, common	4"	4"
Velvetleaf	10"	10"
Waterhemp, (tall, common)	10"	10"

For Additional Control of Later Emerging Grasses

PRIMERO Agricultural Herbicide may be tank mixed with full or reduced rates of preemergence grass herbicides labeled for early postemergence application to field corn (such as Cinch, Cinch ATZ, Prowl, Surpass EC, Dual II Magnum, or Outlook) for residual activity on later emerging flushes of grass. Application must be made before the grass emerges and before other grass weeds on the PRIMERO Agricultural Herbicide label exceed their labeled sizes.

The use of nonionic surfactant is recommended in place of crop oil concentrate for tank mixtures with preemergence grass herbicides where applications are made early postemergence to small grass weeds. (See SPRAY ADJUVANTS for adjuvant rate recommendations.)

When tank mixing PRIMERO Agricultural Herbicide with EC formulated preemergence grass herbicides such as Cinch, Dual II Magnum, or Prowl, do not add Callisto herbicide to the tank mixture. When other formulations of preemergence grass herbicides are tank mixed with ROTAM NICOSULFURON 75 WG + Callisto (such as Cinch ATZ or Bicep II Magnum), limit preemergence herbicide rates to 2/3 times full rates, always add nonionic surfactant in place of crop oil concentrate, and limit broadleaf weed sizes to less than or equal to 4" tall.

When tank mixing PRIMERO Agricultural Herbicide with Lumax or Lexar herbicide, limit Lumax rates to no more than 2 pints and Lexar rates to no more than 2 1/3 pints/acre,

PRIMERO™ Agricultural Herbicide

always add nonionic surfactant in place of crop oil concentrate, omit adjuvants containing ammonium nitrogen fertilizer, and limit applications to corn up to 5" tall.

Tank mixes of PRIMERO Agricultural Herbicide and preemergence grass herbicides must be broadcast applied postemergence to field corn before the crop exceeds the heights listed on the preemergence grass herbicide label. (Refer to WHEN TO APPLY POSTEMERGENCE and the preemergence grass herbicide label for complete postemergence application information, rates, and restrictions.)

Tank Mixtures with Insecticides

ROTAM NICOSULFURON 75 WG may be tank mixed with pyrethroid or carbamate insecticides such as Asana XL or Lannate insecticides. See Soil Insecticide Interaction section for information on use of ROTAM NICOSULFURON 75 WG following soil insecticides application.

Other Tank Mixtures

Other than the exceptions noted, and in addition to the tank mix partners and rates indicated above, PRIMERO Agricultural Herbicide may be tank mixed or followed with sequential applications of other products registered for use in field corn. Applications of full or reduced rates of other products registered for use in corn provided:

- The tank mix product is labeled for the same timing, method of application, adjuvants, and use restrictions as PRIMERO Agricultural Herbicide.
- The tank mixture is not specifically prohibited on the label of the tank mix product.
- The tank mix combination is compatible as determined by a "jar test" described in the TANK MIX COMPATIBILITY TESTING section below.

Weed control and crop response with tank mixtures not specifically recommended in this label are the responsibility of the user and manufacturer of the tank mix product.

TANK MIXING PRECAUTIONS:

A corn plant's predisposition to develop fused tissue emerging from the whorl (rattail) after the V- 11 stage may increase when a product containing dicamba (i.e. Clarity, Marksman) is applied to small corn under early stressful conditions. Be aware of this when applying tank mixes with dicamba to small corn (V-3 stage or smaller) under stressful conditions. (See ENVIRONMENTAL CONDITIONS for a description of these stressful conditions.)

To avoid crop injury or antagonism, apply the products indicated below at least seven days before or three days after the application of PRIMERO Agricultural Herbicide.

- Do not tank mix PRIMERO Agricultural Herbicide with Basagran and Laddok or severe crop injury may occur.
- Do not tank mix PRIMERO Agricultural Herbicide with 2,4-D containing products as severe grass control antagonism may occur.
- Do not tank mix PRIMERO Agricultural Herbicide with foliar-applied organophosphate insecticides such as Lorsban, malathion, parathion, etc., as severe crop injury may occur.

Do not exceed labeled application rates. Do not tank mix PRIMERO Agricultural Herbicide with other products that contain the same active ingredients as PRIMERO Agricultural Herbicide (nicosulfuron) unless the label of either tank mix partner specifies the maximum rate that may be used.

TANK MIX COMPATIBILITY TESTING

Perform a jar test prior to tank mixing to ensure compatibility of PRIMERO Agricultural Herbicide and other pesticides. Use a clear glass quart jar lid and mix the tank mix ingredients in their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately 1/2 hour. If the mixture balls-up, forms flakes, sludges, gels, oily films or layers, or other precipitates, it is not compatible and the tank mix combination should not be used.

SEQUENTIAL ROTAM NICOSULFURON 75 WG APPLICATIONS

Annual grasses may have more than one flush of emerging seedlings. Also, regrowth of treated annual grasses may occur due to adverse environmental conditions following application. Perennial grasses may regrow from underground stems or roots, depending upon environmental conditions. To control grasses under these conditions, a sequential application of PRIMERO Agricultural Herbicide may be necessary. The combined dosage of the sequential applications cannot exceed 1 1/3 ounces per acre of PRIMERO Agricultural Herbicide.

CULTIVATION

A timely cultivation may be necessary to control suppressed weeds, or weeds that emerge after an application of PRIMERO Agricultural Herbicide. Optimum timing for cultivation is 7–14 days after PRIMERO Agricultural Herbicide application or upon seeing the establishment of new weeds.

ENVIRONMENTAL CONDITIONS AND BIOLOGICAL ACTIVITY

PRIMERO Agricultural Herbicide provides best results when applied to young, actively growing weeds. Applications made during warm, moist conditions (70°F or more) and adequate soil moisture both before and after application maximizes performance. The degree and duration of control depend on spray coverage, weed spectrum, weed size, growing conditions before and after treatment, soil moisture, and adjuvant selection.

PRIMERO Agricultural Herbicide is rainfast in 4 hours.

Treating weeds that exceed maximum label height or that are under stress may result in incomplete control. Poor weed control or crop injury may result from applications made to plants under stress from:

- abnormally hot or cold weather
- environmental conditions such as drought, water-saturated soils, hail damage, or frost
- disease, insect, or nematode injury
- prior herbicide, or carryover from a previous year's herbicide application.

Severe stress from conditions preceding or immediately following application may also result in crop injury or root weed control. Stress affects all weeds, but especially weeds such as woolly cupgrass, green and yellow foxtail, and wild proso millet.

If the corn or grass weeds are under stress, delay application until stress passes and both weeds and corn resume active growth.

PRIMERO™ Agricultural Herbicide

PRIMERO Agricultural Herbicide rapidly inhibits the growth of susceptible weeds, reducing weed competition within as little as 6 hours after application. Susceptible plants are controlled in 7–21 days.

SOIL INSECTICIDE INTERACTION INFORMATION

Before using ROTAM NICOSULFURON 75 WG, ensure that it is compatible with any insecticides previously applied to the corn crop.

PRIMERO Agricultural Herbicide may interact with certain insecticides previously applied to the crop. Crop response varies with field corn type, insecticide used, insecticide application method, and soil type. PRIMERO Agricultural Herbicide may be applied to corn previously treated with 'Fortress', Aztec, or Force insecticides or non-organophosphate (OP) soil insecticides regardless of soil type.

- DO NOT APPLY PRIMERO Agricultural Herbicide to corn previously treated with Counter 15G or to corn treated with Counter 20CR in-furrow or over the row at cultivation.
- Applications of PRIMERO Agricultural Herbicide to corn previously treated with Counter 20 CR, Lorsban, or Thimet may cause unacceptable crop injury, especially on soils of less than 4% organic matter.

CROP ROTATION

Rotational crops vary in their response to low concentrations of PRIMERO Agricultural Herbicide remaining in the soil. PRIMERO Agricultural Herbicide dissipates rapidly in warm, acidic, microbiologically active soils.

The amount of PRIMERO Agricultural Herbicide which may be present in the soil depends on application rate, soil pH and organic matter content, elapsed time since application, crop production practices, and environmental factors.

Injury to rotational crops may occur in high-pH, cold soils if dry weather prevails between application and rotational crop planting.

Soil pH should be determined by laboratory analysis using the 1 - 1 soil:water suspension method on representative soil samples taken at 0–4" depth. Soil pH varies within fields; therefore, re-cropping should be based on the highest soil pH within each field. Consult local extension publications for recommended soil sampling procedures.

The following rotational intervals should be observed when using PRIMERO Agricultural Herbicide at a maximum of 1 1/3 ounces:

ROTAM NICOSULFURON 75 WG ROTATIONAL CROP GUIDELINE - 1

No soil pH Restrictions

Crop	Rotational Interval in Months
Corn (field, seed)	Anytime
Corn (pop, sweet)*	10
Soybeans	0.5 (15 days)
Cereals, spring (barley, oats, rye, wheat)	8
Cereals, winter (barley, oats, rye, wheat)	4

PRIMERO™ Agricultural Herbicide

Cotton	10
Dry Beans, Peas, Snap Beans	10
Alfalfa**	12
Red Clover**	12
Other Crops	See Rotational Crop Guidelines 2 and 3

*Except the sweet corn varieties "Merit", "Carnival", and "Sweet Success", for which the minimum time interval is 15 months.

**Except for the state of Kansas east of Highway 75, for Minnesota east and south of the Red River Valley and for the states east of the line formed by the western borders of Iowa, Missouri, Arkansas, and Louisiana, where the minimum time interval is 10 months.

ROTAM NICOSULFURON 75 WG ROTATIONAL CROP GUIDELINE - 2

With Soil pH ≤7.5 Restrictions

Crop	Rotational Interval in Months	
	pH 7.5	pH >7.5
Sorghum	10	18*
Sunflowers	11**	18
All other crops not listed in rotational Guidelines 1 or 2	See Rotational Guideline 3	

*Except in Texas and Oklahoma east of Highway 28 1, where the rotational interval is 10 months, regardless of pH.

**Precipitation following application must exceed 14" prior to planting sunflowers.

ROTAM NICOSULFURON 75 WG ROTATIONAL CROP GUIDELINE - 3

With Soil pH ≤6.5 Restrictions

Crop	Rotational Interval in Months	
	pH 6.5	pH >6.5
Sugarbeets*, potatoes**	10	18***
All other crops not listed in Rotational Guidelines 1 or 2	10	18

*Except on irrigated sites in Colorado, Wyoming, Nebraska, Texas, Michigan, and Ohio, where precipitation following application must exceed 25" prior to planting beets, where the interval is 10 months on soils with pH < 7.5. Sites in Minnesota east and south of the Red River Valley may follow these guidelines provided maximum rates of PRIMERO Agricultural Herbicide do not exceed 0.67 oz.

** Irrigated potatoes following irrigated corn treated in the States of WA OR ID, or Utah can be planted 10 months after using PRIMERO Agricultural Herbicide on sprinkler irrigated corn with no soil pH restrictions, providing the maximum use rate on corn does not exceed 1.0 ounce product per season. Corn treated with PRIMERO Agricultural Herbicide must be grown to maturity and receive a minimum of 18 inches of irrigation water before potatoes can be planted at this rotation interval. Injury to potatoes may occur if less than 18 inches of irrigation is used on the previous corn crop. ROTAM NICOSULFURON 75 WG herbicide may not be used in a tankmix or sequential application program with other ALS-inhibiting herbicides, such as, Exceed or Beacon.

***In North Dakota and northwest Minnesota, the cumulative precipitation in the 18 months following application must exceed 28" in order to rotate to sugarbeets or potatoes.

ROTATIONAL CROP GUIDELINES - 4 may be observed when using a single application of PRIMERO Agricultural Herbicide per cropping season with a maximum use rate of 0.67

PRIMERO™ Agricultural Herbicide

ounces product. Rotational intervals should be extended to 12 months if drought conditions prevail after application and before the rotational crop is planted, unless sprinkler irrigation has been applied and totals greater than 15" during the growing season.

ROTAM NICOSULFURON 75 WG ROTATIONAL CROP GUIDELINES - 4

With 0.67 ounces maximum use rate

Crop	Rotational Interval in Months
Alfalfa*	10
Canola	
Flax**	
Potato	
Red clover	
Sunflower	

* On sprinkler irrigated fields in Idaho, Utah, and Northern Nevada it is best to use deep fall tillage such as plowing prior to planting alfalfa. Product degradation may be less on furrow irrigated soils and may result in some crop injury.

**Rotational intervals should be extended to 18 months if drought conditions prevail after application and before the rotational crop is planted, unless sprinkler irrigation has been applied and totals greater than 15" during the growing season.

APPLICATION INFORMATION

Many crops are highly sensitive to PRIMERO Agricultural Herbicide. All direct or indirect contact (such as spray drift) with crops other than field corn should be avoided (see also SPRAY DRIFT MANAGEMENT). For all application systems, use 50-mesh or larger strainer screens.

Do not apply PRIMERO Agricultural Herbicide through any type of irrigation system.

GROUND APPLICATION

Broadcast Application

- Use a minimum of 15 gallons of water per acre (15 GPA) for best performance. Use a minimum of 10 gallons of water per acre (GPA) for light, scattered stands of weeds.
- For best performance, select nozzles and pressure that deliver MEDIUM spray droplets, for example, as indicated in nozzle manufacturer's catalogues and in accordance with ASAE Standard S572. Nozzles that deliver COARSE spray droplets may be used to reduce drift, provided spray volume is increased to maintain coverage on small weeds. For optimal product performance and minimal spray drift, adjust the spray boom to the lowest possible spray height recommended in manufacturers' specifications.
- Ensure that equipment is set up to avoid applying an excessive rate directly over the rows and into the corn plant whorl. This is most likely to occur when a nozzle is positioned directly above the row.
- Overlaps or starting, stopping, slowing, and turning while spraying may result in crop injury.

PRIMERO™ Agricultural Herbicide

Band Application

For band applications, use proportionately less spray mixture, and carefully calibrate the band applicator to not exceed the labeled rate. Carefully follow the manufacturer's instructions for nozzle type (flat fans), orientation, distance of nozzles from the crop and weeds, spray volumes, calibration and spray pressure.

AERIAL APPLICATION

In New York State and California aerial application is not permitted. Use nozzle types and arrangements that will provide optimum spray distribution and maximum coverage at a minimum of 3 GPA.

Do not apply during a temperature inversion, when winds are gusty, or when conditions favor poor coverage and/or off-target spray movement.

SPRAYER PREPARATION/CLEANUP

It is important that spray equipment is clean and free of previous pesticide deposits before using PRIMERO Agricultural Herbicide and then properly cleaned out following application. Clean all application equipment before applying PRIMERO Agricultural Herbicide. Follow the cleanup procedures specified on the label of the product previously sprayed. If no cleanup procedure is provided, use the procedure that follows. Immediately following applications of PRIMERO Agricultural Herbicide, thoroughly clean all mixing and spray equipment to avoid subsequent crop injury.

Note:

- When cleaning spray equipment before applying ROTAM NICOSULFURON 75 WG herbicide, read and follow label directions for proper rinsate disposal of the product previously sprayed.
- Steam cleaning of aerial spray tanks will help to dislodge any visible pesticide deposits.
- When spraying or mixing equipment will be used over an extended period to apply multiple loads of PRIMERO Agricultural Herbicide, partially fill the tank with fresh water at the end of each day of spraying, flush the boom and hoses, and allow to sit overnight.

Cleanup Procedure

1. Drain the tank and thoroughly hose down the interior surfaces. Flush the tank, hoses, and boom with clean water for a minimum of 5 min.
2. Partially fill the tank with clean water and add one gallon of household ammonia* (containing 3% active) for every 100 gallons of water. Finish filling the tank with water, then flush the cleaning solution through the hoses, boom, and nozzles. Add more water to completely fill the tank and allow to agitate or recirculate for at least 15 min. Again, flush the hoses, boom, and nozzles with the cleaning solution, then drain the tank.
3. Repeat Step 2.
4. Remove the nozzles and screens and clean separately in a bucket containing the cleaning agent and water.
5. Thoroughly rinse the tank with clean water for a minimum of 5 min, flushing the water through the hoses and boom.

* Equivalent amounts of an alternate strength ammonia solution or a tank cleaner is also recommended.

SPRAY DRIFT MANAGEMENT

PRIMERO™ Agricultural Herbicide

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 application decisions.

AVOIDING SPRAY DRIFT IS THE RESPONSIBILITY OF THE APPLICATOR.

IMPORTANCE OF DROPLET SIZE

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **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 of this label.)

Controlling Droplet Size - General Techniques

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- **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.

Controlling Droplet Size - Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles with the highest flow rate that provide uniform coverage.
- **Nozzle Orientation - Orienting** nozzles so that the spray is emitted backwards, parallel to the air stream will produce larger droplets than other orientations.
- **Nozzle Type** - Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types.
- **Boom Length** - The boom length should not exceed ¾ of the wing or rotor length longer booms increase drift potential.
- **Application Height** - Application more than 10 ft above the canopy increases the potential for spray drift.

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) that provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size and equipment type

PRIMERO™ Agricultural Herbicide

determine drift potential at any given wind speed. **AVOID GUSTY OR WINDLESS CONDITIONS.**

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 hot and dry conditions, set up equipment to produce larger droplets to reduce effects of evaporation.

TEMPERATURE INVERSIONS

Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by

increasing temperature 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.

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

INTEGRATED PEST MANAGEMENT

This product may be used as part of an Integrated Pest Management (IPM) program that can include biological, cultural, and genetic practices aimed at preventing economic pest damage. IPM principles and practices include field scouting or other detection methods, correct target pest identification, population monitoring, and treating when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

RESISTANCE

When herbicides that affect the same biological site of action are used repeatedly over several years to control the same weed species in the same field, naturally-occurring resistant biotypes may survive a correctly applied herbicide treatment, propagate, and become dominant in that field. Adequate control of these resistant weed biotypes cannot be expected. If weed control is unsatisfactory, it may be necessary to retreat the problem area using a product affecting a different site of action.

PRIMERO™ Agricultural Herbicide

To better manage herbicide resistance through delaying the proliferation and possible dominance of herbicide resistant weed biotypes, it may be necessary to change cultural practices within and between crop seasons such as using a combination of tillage, retreatment, tank-mix partners and/or sequential herbicide applications that have a different site of action. Weed escapes that are allowed to go to seed will promote the spread of resistant biotypes.

It is advisable to keep accurate records of pesticides applied to individual fields to help obtain information on the spread and dispersal of resistant biotypes. Consult your agricultural dealer, consultant, applicator, and/or appropriate state agricultural extension service representative for specific alternative cultural practices or herbicide recommendations available in your area.

IMPORTANT PRECAUTIONS

Injury to or loss of desirable vegetation may result from failure to observe the following:

- Do not apply PRIMERO Agricultural Herbicide or drain or flush application equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.
- Do not use on lawns, walks, driveways, tennis courts, or similar areas.
- Prevent drift of spray to desirable plants.
- Do not contaminate any body of water.
- Thoroughly clean application equipment immediately after use. (See the Sprayer Cleanup section of this label for instructions.)
- Do not graze or feed forage, hay, or straw from treated areas to livestock within 30 days of PRIMERO Agricultural Herbicide application.

STORAGE AND DISPOSAL

Pesticide Storage: Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Store in a cool, dry place.

Pesticide Disposal: Do not contaminate water, food, or feed by disposal. Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

For Plastic Containers: Triple rinse (or equivalent) the container. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Metal Containers (non aerosol): Triple rinse (or equivalent) the container. 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. It is impossible to eliminate all risks associated with the use of this product. Such risks arise from weather conditions, soil factors, off target movement, unconventional farming techniques, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Rotam Agrochemical Company Ltd. These risks can cause: ineffectiveness of the product; crop injury, or; injury to non-target crops or plants. Rotam Agrochemical Company Ltd does not agree to be an insurer of these risks.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ROTAM AGROCHEMICAL COMPANY LIMITED or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ROTAM AGROCHEMICAL COMPANY LIMITED and Seller harmless for any claims relating to such factors.

ROTAM AGROCHEMICAL COMPANY LIMITED warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM AGROCHEMICAL COMPANY LIMITED, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ROTAM USA LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, in no event shall ROTAM AGROCHEMICAL COMPANY LIMITED or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ROTAM AGROCHEMICAL COMPANY LIMITED and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of ROTAM AGROCHEMICAL COMPANY LIMITED.

Cinch®, Asana® and Lannate® are trademarks or registered trademarks of E. I. DuPont de Nemours and Company.

Axiom, Aztec, and Balance" are trademarks or registered trademarks of Bayer CropScience. Basagran, Clarity, Distinct, Laddok, Marksman, Outlook, Prowl, Thimet are

trademarks or registered trademarks of BASF Ag Products.

Beacon, Callisto, Dual, Exceed, Force, Lexar, Lumax, and Northstar, are trademarks or registered trademarks of Syngenta Crop Protection Inc.

Counter, Thimet, Impact, and Fortress and Impact are registered trademarks of Amvac Chemical Corporation.

Harness is a registered trademark of Monsanto.

Lorsban, and Surpass are registered trademarks of Dow AgroSciences LLC.

Registered: 09/20/2007

Manufactured by:
Rotam Agrochemical Company Limited
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong

31/32

PRIMERO™ Agricultural Herbicide
[Back Container Label/Remains on the
Container when Booklet is removed]

PRIMERO™

Agricultural Herbicide

For use on Corn

Active Ingredient:	By weight
Nicosulfuron* 2-[[[(4,6-dimethoxypyrimidin-2-yl)aminocarbonyl]aminosulfonyl]-N,N-dimethyl-3-pyridinecarboxamide	75%
Inert Ingredients:.....	25%
TOTAL	100%

Contains 75% Technical Active ingredient by weight.

*CASRN: 111991-09-4

EPA Reg. No.: 83100 – 8

EPA EST. No.: 069821-CHN-003

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. If you do not understand this label, find someone to explain it to you in detail.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing.

FIRST AID

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

Note to Physican: No specific antidote. Treat symptomatically.

For Emergency Medical treatment call your local poison control center.

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

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.

ENVIRONMENTAL HAZARDS

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 contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

PERSONAL PROTECTIVE EQUIPMENT(PPE)

Some material that are chemical resistant to this product are listed below. If you want more options follow the instructions for Category A on the EPA chemical resistance category selection chart.

- Long-sleeved shirt and long pants.
- Chemical resistant gloves Category A (such as butyl rubber, natural rubber, neoprene rubber, or nitrile rubber), all > 14 mils.
- Shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with The Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Refer to inside label booklet for additional Directions for Use including Mixing Instructions, Spray equipment Cleanup and Spray Drift Management.

Manufactured by:
Rotam Agrochemical Company Limited
7/F Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong

Net Contents: [TBA]
US Standard Measure