

83979-3

3/8/2010

1 of 23



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAR 8 2010

Mr. Frank E. Sobotka, Ph.D.
Agent
Rotam Agrochemical Company Limited
c/o IPM Resources LLC
4032 Crockers Lake Blvd., Suite 818
Sarasota, FL 34238

RE: Notification of Change in Primary Brand Name: "Rowrunner ATO Herbicide"
EPA Registration Number: 83979-3
Date of Submission: February 1, 2010

Dear Dr. Sobotka:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 1, 2010, for the product the above mentioned product. for the above mentioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions 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 me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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

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

20f23



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number ROTAM NORTH AMERICA, INC. (83979)	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ROWRUNNER ATO Herbicide	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Rotam Agrochemical Company Limited C/O IPM Resources LLC 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

NOTIFICATION

MAR 8 - 2010

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

Notification of a change in Primary Brand Name (EPA Reg. No.: 83979-3) from Rotam Diquat Landscape and Aquatic Herbicide to Rowrunner ATO Herbicide.

Section - III

1. Material This Product Will Be Packaged In:

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	2. Type of Container <input type="checkbox"/> Metal <input checked="" 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
 Label Container

4. Size(s) Retail Container
Gallon/Quart

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled 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
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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.

2. Signature 	3. Title Agent	6. Date Application Received (Stamped)
4. Typed Name Frank Sobotka, Ph.D.	5. Date February 01, 2010	

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IPM Resources LLC

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: 215 497-9501 FAX: 215 497-9502

"an intellectual property management resources company"

February 1, 2010

VIA UPS EXPRESS

Montague.Kathryn@epa.gov
[Ph:1- (703) 305-1243]

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: Kathryn Montague PM 23

Subject: NOTIFICATION of Change in Primary Brand Name
ROTAM Diquat Landscape and Aquatic Herbicide (EPA Reg. : 83979-3)

Dear Ms. Montague:

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

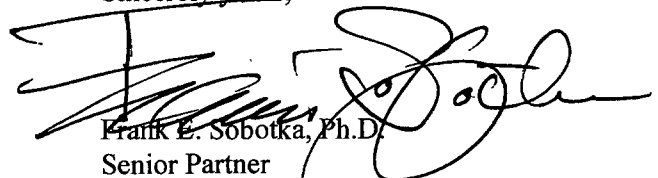
The New Primary Brand Name for the product is as follows:

ROWRUNNER ATO (EPA Reg. No.: 83979-3)

Attached is one copy of the revised label with the new Brand Name.

If you have any questions concerning this Notification please forward all correspondence to the attention of: Dr. Frank E. Sobotka, Senior Partner, IPM Resources LLC.

Sincerely yours,


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

ROWRUNNER™ ATO

Herbicide

TO PREVENT ACCIDENTAL POISONING, NEVER PUT INTO FOOD, DRINK, OR OTHER CONTAINERS, AND USE STRICTLY IN ACCORDANCE WITH ENTIRE LABEL. DO NOT USE THIS PRODUCT FOR REFORMULATION.

ACTIVE INGREDIENT	NOTIFICATION
Diquat dibromide [6,7-dihydrodipyrdo (1,2-a:2',1'-c) pyrazinediium dibromide]	MAR 8 - 2010 37.3%
OTHER INGREDIENTS	62.7%
Total	100.0%

Contains 2 lbs. Diquat cation per gal. as 3.73 lbs. salt per gal.

KEEP OUT OF REACH OF CHILDREN
CAUTION/CUIDADO
 Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
 (If you do not understand the label, find someone to explain it to you in detail.)

See additional Precautionary Statements and Directions For Use inside booklet.

EPA Reg. No. 83979-3 / EPA Est. No. 37429-GA-01

Net Contents: 1 Gallon

Manufactured for:
Rotam North America, Inc.
 1400 NW 107th Avenue, Suite 310
 Miami, FL 33172
 1-866-927-6826



50923

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PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION

Harmful if inhaled. Harmful if swallowed. Causes moderate eye irritation. Avoid breathing spray mist. Avoid contact with eyes, skin, or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are: barrier laminate, butyl rubber >14 mils, nitrile rubber > 14 mils. If you want more options, follow the instructions for Category A on an EPA Chemical Resistance Category Selection Chart.

Mixers, Loaders, Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants, or coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading
- Face shield when mixing or loading

Exception: After this product has been diluted to 0.50% ROWRUNNERATO Herbicide or less in water (i.e., the labeled rate for some spot applications), applicators for **AQUATIC SURFACE APPLICATIONS** must, at a minimum, wear (Note - Mixers and Loaders for this application method must still wear the personal protective equipment (PPE) as described in the above section):

- Long-sleeved shirt and long pants
- Shoes plus socks
- Waterproof gloves
- Protective eyewear

Exception: At a minimum, applicators for **AQUATIC SUBSURFACE APPLICATIONS** must wear (Note - Mixers and Loaders for this application method must still wear the personal protective equipment (PPE) as described in the above section):

- Short-sleeved shirt and short pants
- Waterproof gloves
- Chemical-resistant footwear plus socks

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS STATEMENTS

Mixers and loaders supporting aerial applications are required to use closed systems that provide dermal protection. The closed system must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for Agricultural pesticides [40 CFR 170.240(d)(4)]. When using the closed system, mixers and loaders' PPE requirements may be reduced or modified as specified in the WPS.

ENGINEERING CONTROLS

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

USER SAFETY PRECAUTIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
Prolonged contact of the product with the skin may produce burns.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Remove clothing/PPE immediately if pesticides get inside. Then wash thoroughly and put on clean clothing. Prolonged contact of the product with the skin may produce burns.

FIRST AID

IF INHALED

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

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.

Note to Physician

To be effective, treatment for diquat poisoning must begin IMMEDIATELY. Treatment consists of binding diquat in the gut with suspensions of activated charcoal or bentonite clay, administration of cathartics to enhance elimination, and removal of diquat from the blood by charcoal hemoperfusion or continuous hemodialysis.

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

HOTLINE NUMBER

For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call (303) 623-5716 (Rocky Mountain Poison Control Center)

For Transportation Emergencies: Call CHEMTREC at 1-800-424-9300.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. For Terrestrial Uses, 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 disposing of equipment wash water. For Aquatic Uses do not apply directly to water except as specified on this label.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

Do not apply this product through any type of irrigation system.

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

AGRICULTURAL USE REQUIREMENTS

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

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls over short-sleeved shirt and short pants, or coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

NON-AGRICULTURAL USE REQUIREMENTS

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

Keep all unprotected persons out of operating areas or vicinity where there may be drift.

For terrestrial uses, do not enter or allow entry of maintenance workers into treated areas, or allow contact with treated vegetation wet with spray, dew, or rain, without appropriate protective clothing until spray has dried.

For aquatic uses, do not enter treated areas while treatments are in progress.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Do not contaminate feed, foodstuffs, or drinking water. Do not store or transport near feed or food. Store at temperatures above 32°F. Open dumping is prohibited.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA regional office for guidance.

Container Disposal

Nonrefillable container 5 gallons or less: Nonrefillable container. Do not reuse or refill this container. Triple rinse or pressure rinse promptly after emptying. Then offer for recycling if available or recondition if appropriate, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Residue Removal: Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

For Bulk and Mini-Bulk Containers: Refillable container. Refill this container with pesticides only. Do not reuse this container for any other purpose. Reseal this container and offer for reconditioning, or triple rinse (or equivalent) and offer for recycling or reconditioning, or clean in accordance with manufacturer's instructions. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

Container Precautions: Before refilling, inspect thoroughly for damage, such as cracks, punctures, bulges, dents, abrasions, and damaged or worn threads on closure devices.

Container Handling: After emptying, replace valve caps and tightly rebolt top hatch of tank car or truck. Follow Rotam's instructions for the return of bulk containers.

Refill only with ROWRUNNER ATO Herbicide. The contents of this container cannot be completely removed by cleaning.

Refilling with materials other than ROWRUNNER ATO Herbicide will result in contamination and may weaken container.

After filling and before transporting, check for leaks.

Do not refill or transport damaged or leaking container.

CONTAINER IS NOT SAFE FOR FOOD, FEED, OR DRINKING WATER

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC AT 1-800-424-9300.

GENERAL PRODUCT INFORMATION

ROWRUNNER ATO Herbicide is a nonvolatile herbicide for use as a preharvest aid to desiccate certain crops in order to facilitate harvesting. ROWRUNNER ATO Herbicide can also be use as a general herbicide to control weeds in noncrop areas and nonbearing crops. ROWRUNNER ATO Herbicide is a contact-type herbicide and requires actively growing green plant tissue to function. Thorough coverage of all green plant tissue is essential for effective control. ROWRUNNER ATO Herbicide is rapidly absorbed by green plant tissue and interacts with the photosynthetic process to produce compounds which destroy plant cells. Herbicidal activity is usually quite rapid with effects visible in a few days.

AGRICULTURAL USE DIRECTIONS

ROWRUNNER ATO Herbicide is a nonvolatile herbicidal chemical for use as a general herbicide to control weeds in commercial greenhouses and nurseries; ornamental seed crops (flowers, bulbs, etc. - except in the state of California); landscape, industrial, recreational, commercial, residential, and public areas; turf renovation (all turf areas except commercial sod farms); dormant established turfgrass (bermudagrass, zoysiagrass - nonfood or feed crop); and Herbicide areas. Absorption and herbicidal action is usually quite rapid with effects visible in a few days. ROWRUNNER ATO Herbicide controls weeds by interfering with photosynthesis within green plant tissue. Weed plants should be succulent and actively growing for best results. Rinse all spray equipment thoroughly with water after use. Avoid spray drift to crops, ornamentals, and other desirable plants during application, as injury may result. Application to muddy water may result in reduced control. Minimize creating muddy water during application. Use of dirty or muddy water for ROWRUNNER ATO Herbicide dilution may result in reduced herbicidal activity. Avoid applying under conditions of high wind, water flow, or wave action.

SPRAY DRIFT MANAGEMENT

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR AND THE GROWER.

The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses, or to applications using dry formulations.

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

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

Droplet Size

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

Controlling Droplet Size

Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

Pressure - Do not exceed the nozzle manufacturers suggested pressures. For many nozzle types, lower pressure produces large droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

Number of Nozzles - Use the minimum number of nozzles that provide uniform coverage.

Nozzle Orientation - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the suggested practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.

Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length

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

Application Height

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

Swath Adjustment

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller drops, etc.).

Wind

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity

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

Temperature Inversions

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

Sensitive Areas

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

COMMERCIAL GREENHOUSES AND NURSERIES

For general weed control in commercial greenhouses (beneath benches), field grown and container stock, and other similar areas, ROWRUNNER ATO Herbicide may be applied preplant or postplant preemergence in field grown ornamental nursery plantings or postemergence as a directed spray. ROWRUNNER ATO Herbicide may also be applied preemergence in ornamental seed crops (except in the state of California). Avoid contact with desirable foliage as injury may occur. Do not use on food or feed crops.

Spot spray: Apply either 1-2 qts. ROWRUNNER ATO Herbicide plus the labeled rate of a 75% or greater nonionic surfactant per 100 gals. of water, or 0.75 oz. (22 mls.) of ROWRUNNER ATO Herbicide plus the labeled rate of a 75% or greater nonionic surfactant per 1 gal. of water.

Broadcast: Apply 1-2 pts. of ROWRUNNER ATO Herbicide in a minimum of 15 gals. of water per acre. Add the labeled rate of a 75% or greater nonionic surfactant per 100 gals. of spray mixture. Use an adequate spray volume to insure good coverage.

**ORNAMENTAL SEED CROPS (FLOWERS, BULBS, ETC.) EXCEPT IN THE STATE OF CALIFORNIA
For preharvest desiccation of ornamental seed crops. NOT FOR FOOD OR FIBER CROPS.**

Broadcast (Air or Ground): 1.5-2.0 pts. of ROWRUNNER ATO Herbicide plus the labeled rate of a 75% or greater nonionic surfactant per acre in sufficient water (minimum of 5 gals. by air, 15 gals. by ground) for desiccation and weed burndown. Repeat as needed at no less than 5-day intervals up to three applications. Do not use seed, screenings, or waste as feed or for consumption.

**DIRECTIONS FOR LANDSCAPE, INDUSTRIAL, RECREATIONAL, COMMERCIAL, RESIDENTIAL,
AND PUBLIC AREAS**

ROWRUNNER ATO Herbicide provides fast control of broadleaf and grassy weeds in industrial, recreational, golf course, commercial, residential, and public areas.

ROWRUNNER ATO Herbicide is a nonselective herbicide that rapidly kills undesirable above ground weed growth in 24-36 hours. Avoid application of ROWRUNNER ATO Herbicide to desirable plants.

ROWRUNNER ATO Herbicide is a contact/desiccant herbicide; it is essential to obtain complete coverage of the target weeds to get good control. Improper application technique and/or application to stressed weeds may result in unacceptable weed control. For best results, apply to actively growing, young weeds.

Difficult weeds (such as perennial or deeply-rooted weeds) can often be controlled by tank mixing ROWRUNNER ATO Herbicide with other systemic-type herbicides. Refer to other product labels for specific application directions.

For residual weed control, tank mix ROWRUNNER ATO Herbicide with a preemergent herbicide labeled for the intended use site. When mixing ROWRUNNER ATO Herbicide with another herbicide, it is recommended to mix just a small amount first to determine if the mixture is physically compatible before proceeding with larger volumes.

Rotam North America, Inc. has not tested all possible tank mixtures with other herbicides for compatibility, efficacy or other adverse effects. Before mixing with other herbicides Rotam recommends you first consult your state experimental station, state university or extension Agent.

Grounds Maintenance Weed Control

ROWRUNNER ATO Herbicide can be used as a spot or broadcast spray to control weeds in public, commercial and residential landscapes, including landscape beds, lawns, golf courses and roadsides. ROWRUNNER ATO Herbicide can also be used for weed control around the edges and nonflooded portions of ponds, lakes and ditches.

Trim and Edge Weed Control

ROWRUNNER ATO Herbicide can be used to eliminate undesired grass and broadleaf plant growth in a narrow band along driveways, walkways, patios, cart paths, fence lines, and around trees, ornamental gardens, buildings, other structures, and beneath noncommercial greenhouse benches. Vegetation control with ROWRUNNER ATO Herbicide is limited to the spray application width. Do not exceed the labeled rate of ROWRUNNER ATO Herbicide as excessive rates may result in staining of concrete-based materials.

ROWRUNNER ATO Herbicide, since it does not translocate systemically, can be used as an edging or pruning tool when precisely applied to select areas of grass or to undesirable growth on desirable ornamental bedding plants, ground covers, etc.

Industrial Weed Control

ROWRUNNER ATO Herbicide can be used as a spot or broadcast spray either alone or in combination with other herbicides as a fast burndown or control weeds in rights-of-ways, railroad beds/yards, highways, roads, dividers and medians, parking lots, pipelines, pumping stations, public utility lines, transformer stations and substations, electric utilities, storage yards, and other non-crop areas.

Spot spray: Apply either 1-2 qts. of ROWRUNNER ATO Herbicide plus the labeled rate of a 75% or greater nonionic surfactant per 100 gals. of water, or 0.75 oz. (22 mls.) ROWRUNNER ATO Herbicide plus the labeled rate of a 75% or greater nonionic surfactant per 1 gal. of water.

Broadcast: Apply 1-2 pts. of ROWRUNNER ATO Herbicide per acre in sufficient water to insure good spray coverage. Add the labeled rate of 75% or greater nonionic surfactant per 100 gals. of spray mixture. Greater water volumes are necessary if the target plants are tall and/or dense. It is recommended that 60 gals. or greater water volume be used to obtain good coverage of dense weeds.

TURF RENOVATION (ALL TURF AREAS EXCEPT COMMERCIAL SOD FARMS)

To desiccate golf course turf and other turf areas prior to renovation, apply 1-2 pts. of ROWRUNNER ATO Herbicide per acre plus the labeled rate of a 75% or greater nonionic surfactant in 20-100 gals. of water (4 teaspoons of ROWRUNNER ATO Herbicide plus, the labeled rate of a 75% or greater nonionic surfactant per 1 gal. of water) using ground spray equipment. Apply for full coverage and thorough contact with the turfgrass. Apply only when the turf is dry, free from dew and incidental moisture. For enhanced turf desiccation, especially in the case of thick turfgrass, water volumes should approach 100 gals. of water per acre.

For **suppression** of regrowth and quick desiccation of treated turfgrass, ROWRUNNER ATO Herbicide may be mixed with other systemic nonselective or systemic postemergence grassy weed herbicides. Refer to other product labels for specific application directions and restrictions.

Avoid spray contact with, or spray drift to, foliage of ornamental plants or food crops. Do not graze livestock on treated turf or feed treated thatch to livestock.

DORMANT ESTABLISHED TURFGRASS (BERMUDAGRASS, ZOYSIAGRASS), NONFOOD OR FEED CROP

For control of emerged annual broadleaf and grass weeds, including Little Barley*, Annual Bluegrass, Bromes including Rescuegrass, Sixweeks fescue, Henbit, Buttercup, and Carolina Geranium in established dormant Bermudagrass lawns, parks, golf courses, etc:

Apply 1-2 pts. of ROWRUNNER ATO Herbicide per acre in 20-100 gals. of spray mix by ground as a broadcast application. Add the labeled rate of a 75% or greater nonionic surfactant per 100 gals. of spray mixture.

Bermudagrass must be dormant at application. Application to actively growing Bermudagrass may cause delay or permanent injury. Users in the extreme Southern areas should be attentive to the extent of dormancy at the time of application.

*For control of Little Barley, apply ROWRUNNER ATO Herbicide prior to the mid-boot stage.

AQUATIC USE DIRECTIONS

New York - Not for Sale or Use in New York State without Supplemental Special Local Needs Labeling.

Necessary approval and/or permits must be obtained prior to application if required. Consult the responsible State Agencies (i.e., Fish and Game Agencies, State Water Conservation authorities, or Department of Natural Resources).

Treatment of dense weed areas may result in oxygen loss from decomposition of dead weeds. This loss of oxygen may cause fish suffocation. Therefore, treat only 1/3 to 1/2 of the water body area at one time and wait 14 days between treatments.

For best results on submersed weeds, ROWRUNNER ATO Herbicide should be applied to actively growing (photosynthesizing) weeds when water temperatures have reached or exceeded approximately 50°F, typically during the Spring or early Summer.

For application only to **still water** (i.e. ponds, lakes, and drainage ditches) where there is minimal or no outflow to public waters.

and/or

For applications to **public waters** in ponds, lakes, reservoirs, marshes, bayous, drainage ditches, canals, streams, rivers, and other slow-moving or quiescent bodies of water for control of aquatic weeds. For use by

- Corps of Engineers; or
- Federal or State Public Agencies (i.e. Water Management District personnel, municipal officials); or
- Applicators and/or Licensees (Certified for aquatic pest control) that are authorized by the State or Local government.

Treated water may be used according to the following table or until such time as an approved assay (example: PAM II Spectromatic Method) shows that the water does not contain more than the designated maximum contaminant level goal (MCLG) of 0.02 mg/l. (ppm) of diquat dibromide (calculated as the cation).

Water Use Restrictions Following Applications With ROWRUNNER ATO Herbicide (Days)

Application Rate	Drinking	Fishing and Swimming	Livestock/ Domestic Animals Consumption	Spray Tank Applications** and Irrigation to Turf and Landscape Ornamentals	Spray Tank Applications** and Irrigation to Food Crops and Production Ornamentals
2 gallons/surface acre	3 days	0	1 day	3 days	5 days
1 gallon/surface acre	2 days	0	1 day	2 days	5 days
0.75 gallon/surface acre	2 days	0	1 day	2 days	5 days
0.50 gallon/surface acre	1 day	0	1 day	1 day	5 days
Spot Spray* (< 0.5 gallon/surface acre)	1 day	0	1 day	1 day	5 days

* Add a nonionic surfactant (with at least 75% of the constituents active as a spray adjuvant) at the rate recommended by the manufacturer.

** For preparing agricultural sprays for food crops, turf or ornamentals (to prevent phytotoxicity), do not use water treated with ROWRUNNER ATO Herbicide before the specified time period.

When the contents of more than one spray tank is necessary to complete a single Aquatic application, no water holding restrictions apply between the consecutive spray tanks.

No applications are to be made in areas where commercial processing of fish, resulting in the production of fish protein concentrate or fishmeal, is practiced. Before application, coordination and approval of local and/or State authorities must be obtained.

Floating and Marginal Weeds Including:

Water lettuce, *Pistia stratiotes*

Water hyacinth, *Eichhornia crassipes*

Duckweed, *Lemna* spp.

Salvinia spp. (including *S. molesta*)

Pennywort (*Hydrocotyle* spp.)

Frog's bit¹, *Limnobium spongia*

Cattails, *Typha* spp.

¹Not for use in California

ROWRUNNER ATO Herbicide may be applied by backpack, airboat, spray handgun, helicopter, airplane, or similar application equipment that results in thorough spray coverage.

Spot Treatment: Apply ROWRUNNER ATO Herbicide at 2 quarts per 100 gallons spray carrier (0.5% solution) with an approved Herbicide wetting agent at 0.25-1.0% v/v (1 quart to 1 gallon per 100 gallons water). For cattail control, ROWRUNNER ATO Herbicide should be applied prior to flowering at the maximum application rate (8 quarts of ROWRUNNER ATO Herbicide/100 gallons spray carrier) plus the wetting agent. Repeat treatments may be necessary for complete control.

Spray to completely wet target weeds but not to runoff. Densely packed weeds or mats may require additional applications due to incomplete spray coverage. Re-treat as needed. For best results, re-treat weed escapes within 2 weeks of the initial treatment.

Broadcast Treatment: Apply ROWRUNNER ATO Herbicide at the rate of 0.5-2.0 gals. per surface acre in sufficient carrier along with 16-32 oz./A of an approved wetting agent. Re-treat as necessary for densely populated weed areas. Good coverage is necessary for control of the target weeds.

For duckweed control, apply ROWRUNNERTM ATO Herbicide at 1.0-2.0 gals./A.

Submersed Weeds Including:

Bladderwort, *Utricularia* spp.

Hydrilla, *Hydrilla verticillata* (including Eurasian), *Myriophyllum* spp.

Pondweeds¹, *Potamogeton* spp.

Coontail, *Ceratophyllum demersum*

Elodea, *Elodea* spp.

Brazilian Elodea, *Egeria densa*

Naiad, *Najas* spp.

Algae², *Spirogyra* spp. and *Pithophora* spp.

¹ ROWRUNNER ATO Herbicide controls *Potamogeton* species except Richardson's pondweed, *P. richardsonii*

² Suppression only. For control of *Spirogyra* and/or *Pithophora*, use ROWRUNNER ATO Herbicide in a tank mix with an approved algaecide.

For severe weed or algae infestations, the use of an approved algaecide either as a pretreatment to the ROWRUNNER ATO Herbicide application or in a tank mix, may result in enhanced weed control.

To control submersed weeds, apply ROWRUNNER ATO Herbicide in water at 0.5-2.0 gals. per surface acre (per 4 foot water depth). For severe weed infestations, use the 2.0 gals. per surface acre rate. For best results, re-treat as necessary on 14-21 day intervals. The table below shows how many gallons of ROWRUNNER ATO Herbicide to apply per surface acre based on water depth.

	Gallons of ROWRUNNER ATO Herbicide per Surface Acre Based on Average Water Depth			
	1 Foot	2 Feet	3 Feet	4 Feet
1 gallon/acre rate	0.25 gal.	0.50 gal.	0.75 gal.	1.0 gal.
2 gallons/acre rate	0.50 gal.	1.0 gal.	1.5 gals.	2.0 gals.

Note: For water depths of 2 feet or less including shorelines, do not exceed 1 gallon of ROWRUNNER ATO Herbicide per surface acre.

Subsurface Applications: Where the submersed weed growth, especially Hydrilla, has reached the water surface, apply either in a water carrier or an invert emulsion through boom trailing hoses carrying nozzle tips to apply the dilute spray below the water surface to insure adequate coverage.

Bottom Placement: Where submersed weeds such as Hydrilla, Bladderwort, or Coontail have reached the water surface and/or where the water is slowly moving through the weed growth, the use of an invert emulsion carrier injecting diluted ROWRUNNERTM ATO Herbicide near the bottom with weighted hoses may improve control. The addition of a copper based algaecide may improve control. If algae are present along with the submersed weeds, a pretreatment with a copper based algaecide may improve overall control.

Surface Application for Submerged Aquatic Weeds: Apply the recommended rate of ROWRUNNER ATO Herbicide as a spray in sufficient carrier to fully cover the target area. Applications should be made to ensure complete coverage of the weed areas. In mixed weed populations, use the high rate of application as indicated by weeds present. For dense submersed weeds or water over 2 feet deep, a surface spray is not recommended (ROWRUNNER ATO Herbicide should be applied subsurface in these situations.)

If posting is required by your state or tribe - consult the Agency responsible for pesticide regulations for specific details.

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Manufactured for:
Rotam North America, Inc.
1400 NW 107th Avenue, Suite 310
Miami, FL 33172
1-866-927-6826