2021
Vegetation Management
Massachusetts Rights-of-Way
Yearly Operational Plan

TABLE OF CONTENTS

SECTION	TOPIC	PAGE
	SUMMARY	3
1	INTRODUCTION	4
2	LOCATION OF PROPOSED HERBICIDE TREATMENTS IN 2021	5
3	INTEGRATED VEGETATION MANAGEMENT, INCLUDING ALTERNATIVE CONTROL METHODS	5
4	IDENTIFICATION OF INCOMPATIBLE TARGET VEGETATION	7
5	SENSITIVE AREAS	9
6	DESCRIPTION OF MAP(S) LOCATING THE RIGHTS-OF-WAY	13
7	PROPOSED HERBICIDES, CARRIERS, ADJUVANTS AND RATES	13
8	PROCEDURES AND LOCATIONS FOR HANDLING, MIXING, AND LOADING HERBICIDE CONCENTRATES	16
9	INDIVIDUALS SUPERVISING THE YOP	17
10	CONTRACTORS THAT WILL PERFORM HERBICIDE TREATMENTS	17
11	REMEDIAL SPILL AND EMERGENCY PLAN	18

LIST OF TABLES

TABLE #	TOPIC	PAGE
TABLE 1	TANK MIXES FOR LOW VOLUME FOLIAR APPLICATIONS	14
TABLE 2	TANK MIXES FOR CUT STUMP TREATMENT (CST) APPLICATIONS	15
TABLE 3	TANK MIXES FOR LOW VOLUME BASAL APPLICATIONS	15
TABLE 4	TANK MIXES FOR DORMANT STEM APPLICATIONS	19
TABLE 5	HERBICIDE MANUFACTURERS	19
TABLE 6	STATE AGENCIES	20
TABLE 7	EMERGENCY SERVICES	20
TABLE 8	NATIONAL GRID CONTACTS IN THE CASE OF A SPILL	
	OR ACCIDENT	20
TABLE 9	REMEDIAL PLAN TO ADDRESS SPILLS	21

APPENDICES

APPENDIX #	TOPIC	PAGE
APPENDIX 1	333 CMR 11.00, RIGHTS-OF-WAY MANAGEMENT	22
APPENDIX 2	RIGHTS-OF-WAY PROPOSED FOR TREATMENT IN 2021	41
APPENDIX 3	RIGHTS-OF-WAY TREATED IN 2020	45
APPENDIX 4	LIST OF MUNICIPALITIES FOR NOTIFICATION IN 2021	50
APPENDIX 5	LIST OF IDENTIFIED PRIVATE WELLS	53
APPENDIX 6	SENSITIVE AREAS: TABLE AND ILLUSTRATIONS OF LIMITED SPRAY AND NO SPRAY AREAS	55
APPENDIX 7	LIST OF COMPATIBLE SPECIES AND INCOMPATIBLE SPECIES	60
APPENDIX 8	HERBICIDE LABELS	64
APPENDIX 9	HERBICIDE FACT SHEETS	269
APPENDIX 10	NATIONAL GRID ENVIRONMENTAL POLICY	327

SUMMARY

The purpose of this Yearly Operational Plan (hereafter referred to as “YOP”) is to outline the National Grid USA Electric Companies’ (hereafter referred to as “National Grid”) 2021 program for managing vegetation with herbicides on the included rights-of-way. This program and YOP have been developed in compliance with 333 CMR 11.00, Rights-of-way Management regulations administered by the Massachusetts Department of Agricultural Resources (MDAR).

In compliance with 333 CMR 11.06 and 11.07 and Chapter 85 of the Acts of 2000, the YOP and notification process provides for a 45 day public review and comment period which starts when MDAR publishes a notice in the Environmental Monitor, a 21 day review period for the municipal notification letter (may run simultaneously), and a 48 hour newspaper notice. These review periods give communities an opportunity to provide information that help identify additional areas that may require specific precautions or protection.

Under the supervision of our professional foresters, herbicide applications are part of an Integrated Vegetation Management (IVM) program that also uses mechanical and natural controls and takes into consideration the cultural use of the landscape. This IVM program is outlined in our Five-Year Vegetation Management Plan (VMP), copies of which are available upon request or at:

https://www9.nationalgridus.com/transmission/c3-8_standocs.asp

National Grid retains independent, experienced contractors to perform the treatment applications using herbicide and mechanical control methods. Herbicides are only applied by trained, licensed applicators using hand-held equipment under the direct supervision of certified supervisors/foremen.

Any comments on this YOP should be directed to the contact person listed in Section 9.

1. INTRODUCTION

In compliance with 333 CMR 11.00, Rights-of-way Management, National Grid's Yearly Operational Plan (YOP) outlines their 2021 vegetation management program on selected electrical transmission and sub-transmission rights-of-way. This YOP is consistent with the terms and procedures set forth in National Grid's 2019-2023 Vegetation Management Plan (VMP); with the Massachusetts Pesticide Control Act (Chapter 132B); with all pertinent clauses in Chapter 85 of the Acts of 2000; with the Massachusetts Endangered Species Act (MESA; MGL c. 131 A) and regulations (321 CMR 10.00); Wetlands Protection (310 CMR 10.00) and Drinking Water (310 CMR 22.00) regulations of the Massachusetts Department of Environmental Protection, and with all state and federal acts and regulations that apply to right-of-way vegetation management in the Commonwealth of Massachusetts.

The purpose of 333 CMR 11.00 is to establish a statewide and uniform regulatory process which will minimize the uses of, and potential impacts from, herbicides in rights-of-way on human health and the environment while allowing for the benefits to public safety provided by the selective use of herbicides (333 CMR 11.01).

333 CMR 11.00 (Appendix 1) is the most comprehensive rights-of-way regulation in New England. It requires an Integrated Pest Management (in this case IVM) approach to right-of-way vegetation management; the establishment of standards and procedures to prevent unreasonable risks to humans or the environment, and a multi-layered system of public and municipal notification that requests input about environmentally and culturally sensitive areas. All of this is outlined in National Grid's VMP and annual YOPs, the vehicles for establishing and implementing IVM programs, which serve as guides for the public, state and municipal officials, vegetation management contract personnel and National Grid.

National Grid's IVM program is carried out over the course of a three to five year maintenance cycle on the company's 1,500 miles of rights-of-way throughout the Commonwealth. These transmission and sub-transmission electric line rights-of-way cover a range of terrain types from remote countryside to the middle of busy population

centers. In all locations, the rights-of-way must be kept clear of vegetation that may interfere with the safe, reliable delivery of electric services. To achieve this goal, National Grid utilizes the IVM program described in the VMP and summarized below in Section 3.

2. LOCATION OF PROPOSED HERBICIDE TREATMENTS IN 2021

The rights-of-way proposed for herbicide treatments in 2021 are listed in Appendix 2 and the rights-of-way listed to facilitate “touch up” on segments treated in 2020 are listed in Appendix 3. The municipalities, through which they pass, are listed in two tables in Appendix 4, one for the municipalities for 2021 lines and one for the municipalities for 2020 “touch-up” lines (some municipalities are listed in both tables). Please note that the proposed ROWs may change due to workplan constraints.

3. INTEGRATED VEGETATION MANAGEMENT, INCLUDING ALTERNATIVE CONTROL METHODS

National Grid’s selective use of herbicides for vegetation management is done within the context of the IVM program outlined in our VMP. In brief: IVM is a combination of mechanical, chemical and natural controls that minimize the disadvantages and maximize the benefits of each. The integration of all three controls creates a well-balanced program that reduces the negative impact on compatible vegetation while controlling incompatible vegetation. IVM is an environmentally responsible means of intentionally managing succession by maintaining vegetation below heights that interfere with the delivery of electrical service.

Mechanical and chemical controls are the direct techniques used to target incompatible vegetation (for example, mowing, hand-cutting, selective pruning and herbicide applications, as described in Section 6 of the VMP). Natural control is the process of working with the cycles of plant succession and interspecies competition to facilitate the spread and stabilization of early succession plant communities that discourage the establishment of taller, woody vegetation. Natural controls are the result of the conscientious, selective use of mechanical and chemical controls. All three

controls depend upon each other in a continuous cycle that employs the unique advantages of each.

The cultural component of the IVM program is not technically a control method. Cultural controls are recognizing and managing landscape changes along the right-of-way that prescribe the choice of IVM techniques and adapting or limiting the specific control methods to suit the management situation. These are areas of a right-of-way in which geologic, geographic, climactic, environmental and legal factors along with economic, agricultural, social and recreational uses of the landscape affect the application of IVM management techniques to the existing vegetation.

Within an IVM program, inspections, timing of applications and avoiding fixed schedules maximizes control while minimizing herbicide use. The rights-of-way scheduled for mechanical and chemical treatments in 2021 have incompatible vegetation heights that average from six to ten feet and/or low to moderate densities. Where herbicides are applied by trained, licensed and certified applicators using hand held equipment, applicators will walk to each incompatible plant and apply the minimal effective amount of herbicide (selective herbicide applications).

Mechanical control methods will be used where regulatory, cultural and/or National Grid policy restrictions require hand cutting and/or mowing, including but not limited to the following situations:

1. All vegetation over 12 feet in height will be cut or mowed and when appropriate the stumps treated with herbicides to prevent re-sprouts.

2. All conifers less than two feet in height are not treated.

3. Non sprouting conifers taller than two feet are hand-cut or mowed without herbicides applied to the stumps.

4. Pitch Pine stumps which re-sprout are cut and treated with herbicides.

5. Hand cutting and/or mowing are used in “no-spray” *sensitive areas* (see Appendix 6).

6. Mowing and/or hand cutting are used in areas where easement, National Grid policy and/or landowner agreements preclude herbicide applications.

7. Right-of-way sections devoid of trees: areas where compatible, low growing, shrubs, ferns and grasses make up the vegetative cover; wet areas where a high water table prevents trees from growing; and areas where land use prevents the establishment of trees are not treated with herbicides.

4. IDENTIFICATION OF INCOMPATIBLE TARGET VEGETATION

The primary target “pest” on an electric right-of-way is woody vegetation, primarily trees that are capable of interrupting the safe delivery of energy products to our customers. Other incompatible vegetation includes dense woody vegetation, vines, noxious, nuisance and poisonous vegetation, and all vegetation that interferes with access around structures, access roads & trails, substations and anywhere in which vegetation prevents access to the right-of-way for inspections, maintenance, repairs and emergency access to the lines.

With a few exceptions, all incompatible species will be removed or controlled during a treatment operation. Within the cleared width of the right-of-way, all incompatible species, except conifers less than two feet tall, will be removed or controlled.

Tree species are identified as woody plants that mature at heights exceeding 15 feet. These trees must be removed because they are capable of growing tall enough to grow into or fall onto the lines. In rare isolated instances, such as in steep ravines and on severe slopes, the electric lines are high enough off the ground so that mature trees will not interfere with the operation of the line and, therefore, trees may be left.

Except in no-spray sensitive areas (see Section 5), hardwoods over 12 feet tall are hand cut and the stumps treated with herbicides. Hardwoods less than 12 feet tall

and woody plant species that present safety problems are treated with herbicides using either low volume foliar or basal application methods. As mentioned above, Pitch Pine is the only conifer species treated with herbicides.

Trees that need to be removed will be identified visually by trained treatment crews and include, but are not limited to:

Ash	Cherry	Maple
Aspen	Hemlock	Oak
Beech	Pine	Willow
Birch	Poplar	

All woody vegetation (trees, shrubs, vines) on or encroaching upon existing roads or pathways or immediately adjacent to line structures or equipment will be treated by mechanical or herbicide control methods. If no access along the right-of-way exists, a pathway will be created and maintained in a suitable location by treating all woody vegetation within the selected route. Woody vegetation must be treated in these areas to ensure access to and along the right-of-way, and access to line structures for safe and efficient inspection, maintenance, and repair operations.

Other plant species to be controlled include shrub and vine species and vegetation that because of heavy thorn growth or dermal toxicity may be hazardous including, but not limited to:

Alder	Grapevines	Poison Ivy
Bittersweet	Greenbriar	Sumac (poison)
Blackberry	Hawthorne	Viburnums
Buckthorn	Japanese Knotweed	Virginia Creeper
Bush Honeysuckle	Multiflora Rose	Winterberry

Not all vegetation on the right-of-way are considered incompatible species, in fact, most species are compatible. Compatible plant species that provide the natural controls in our IVM program include, but are not limited to:

Azaleas	Mountain Holly	Spirea
Buttonbush	Mountain Laurel	Sumac
Chokeberry	Privet	Sweet Fern
Common Juniper	Rhododendron	Sweet Pepperbush
Dogwoods	Sedges	Viburnums
High & Low Bush Blueberries	Shadbush	Ferns
Huckleberry	Sheep Laurel	Grasses & Herbaceous sp.

For a complete list of compatible vegetation species and incompatible vegetation species refer to Appendix 7.

5. SENSITIVE AREAS

The general definition of sensitive areas regulated by 333 CMR 11.04 is as follows:

> *…any areas within Rights-of-way, including No-Spray and Limited-Spray Areas, in which public health, environmental or agricultural concerns warrant special protection to further minimize risks of unreasonable adverse effects.*

National Grid also has its own designated sensitive areas including landowner agreements and easement restrictions. Protecting these sites is accomplished by defining specific areas and establishing limited spray and no-spray areas and treatment restrictions within these borders based on the sensitivity of each site and the requirement to minimize any unreasonable adverse impacts within that area.

Sensitive areas regulated by 333 CMR 11.00 include the following:

Water Supplies:
- Zone I's
- Zone II's
- IWPA's (Interim Wellhead Protection Areas)
- Class A Surface Water Sources
- Tributaries to a Class A Surface Water Source
- Class B Drinking Water Intakes
- Private Wells

Surface Waters:
- Wetlands
- Water Over Wetlands
- The Mean Annual High Water Line of a River
- The Outer Boundary of a Riverfront Area
- Certified Vernal Pools

Cultural Sites:
- Agricultural Areas
- Inhabited Areas

Wildlife Areas:
- Certified Vernal Pool Habitat
- Priority Habitat

These sensitive areas consist of no-spray areas in which herbicide use is prohibited, larger limited spray areas where herbicide use is allowed under certain conditions, and/or areas that require special treatment recommendations. Appendix 6 includes diagrams and a table detailing these conditions. Treatment in limited spray areas requires the use of herbicides from the *Sensitive Area Materials List* and application restrictions in 333 CMR 11.04 or in the case of Priority Habitat of State-listed species, approval of the YOP by the Natural Heritage and Endangered Species Program (NHESP) of the Massachusetts Division of Fisheries & Wildlife.

For the purpose of identification, sensitive areas are also separated into readily identifiable in the field and not readily identifiable in the field designations:

1. Sensitive areas “readily identifiable in the field” will be treated and marked according to all applicable restrictions listed in 333 CMR 11.00 and National Grid’s VMP. These areas include but are not limited to rivers and streams, surface waters, wetlands, inhabited areas, agricultural areas and road buffers.

2. Sensitive areas “not readily identifiable in the field” are identified by the use of the data marked on our maps and additional data collected in the YOP and notification processes before the time of treatment. These areas include, but are not limited to public ground water supplies, public surface water supplies and tributaries, private wells, Priority Habitats, certified vernal pools, landowner agreements and easement restrictions.

Sensitive areas will be identified using the appropriate resources and methods from the following list (some of which are already included in National Grid’s records):

1. National Grid right-of-way maps, records and institutional knowledge,

2. Massachusetts Department of Environmental Protection water supply maps and/or GIS mapping layers available through MassGIS,

3. MDAR, Municipal Board of Health maps and lists, and National Grid records of identified private wells along the right-of-way,

4. Correspondence, meetings and input from municipalities within the 45 day YOP and 21 day municipal right-of-way notification letter review and comment periods and the 48 hour newspaper notification (under 333 CMR 11.06 & 11.07 and Chapter 85 of the Acts of 2000),

5. Correspondence and meetings resulting from National Grid's abutter notification procedure,

6. A point person who verifies identified sensitive areas and any additional areas that may require special precautions,

7. United States Geological Survey (USGS) topographical maps,

8. Information from contractor’s knowledge and records,

9. Information from MassGIS,

10. Confidential information from NHESP, and

11. A copy of the YOP and VMP.

As appropriate, sensitive areas will be identified and marked in the field by either National Grid personnel, trained and experienced vegetation management contract personnel, and/or by individuals trained in the identification of sensitive areas.

Priority Habitat of State-Listed Species

In compliance with 321 CMR 10.14, Massachusetts Endangered Species Act Regulations, Part II Exemptions, National Grid has submitted this YOP for approval by the NHESP.

Under the approval process, details about the Priority Habitat of State-listed species that our activities might affect and management recommendations are shared with National Grid under strict confidentiality agreements. Using this data and best management practices, National Grid and contract personnel will follow the appropriate vegetation management treatment methods within these sensitive areas. To identify Priority Habitats, National Grid and vegetation management contract personnel are trained to recognize Priority Habitats using one of the following tools: paper maps, GPS coordinates and/or GIS systems. Particularly sensitive State-listed species will be reviewed and identified in the field for protection by NHESP approved biologists.

Treatment of Wetlands

Pursuant to 333 CMR 11.04(4)(c) based upon the results of two right-of-way wetland impact studies, the Massachusetts Department of Food and Agriculture (now MDAR) in consultation with the Department of Environmental Protection and the Right-of-way Advisory Panel, made a determination that utilities may treat incompatible plant species, except pines, selectively with herbicides in wetlands, under the guidance of an IVM program and with sensitive area approved herbicides except within ten feet of standing or flowing water.

6. DESCRIPTION OF MAP(S) LOCATING THE RIGHTS-OF-WAY

YOP map(s) locating the right(s)-of-way and sensitive areas not readily identifiable in the field will be sent to the appropriate municipal officials.

The maps will include the most current data available at the time of printing. To ensure that applicable sensitive areas are identified on the maps, National Grid is requesting municipal verification of areas currently mapped and the identification of any areas not mapped.

The maps are resources and a tool for the public and vegetation management crews, therefore, they contain the data needed to identify, mark and treat sensitive areas appropriately. At the time of treatment, additional sensitive area information that is collected will be added to the information utilized by National Grid’s vegetation management contractors. Please note that Zone II's are included on the maps, however, National Grid only uses herbicides approved for use within this type of limited spray sensitive area.

7. PROPOSED HERBICIDES, CARRIERS, ADJUVANTS and RATES

Only Commonwealth of Massachusetts recommended herbicides for use in sensitive areas will be used on the full length and width of National Grid's right-of-way corridors. Current herbicide labels are in Appendix 8 and herbicide fact sheets developed and/or approved by MDAR are in Appendix 9.

The following tables outline the proposed herbicides, tank mixes, application methods and estimated application rates:

Table 1: Tank Mixes for Low Volume Foliar Applications				
Herbicides & Adjuvants	**Active Ingredient**	**EPA Registration Number(s)**	**Mix Concentration (per 100 gals. Water)**	**Estimated Application Rate of Active Ingredient Per Acre**
Vastlan*	Triclopyr choline	62719-687	2-7%	16-128 oz.
Krenite S***	Ammonium Salt of Fosamine	42750-247	6-10%	32-128 oz.
Escort XP	Metsulfuron-Methyl	352-439	2-4 oz.	0.125-0.8 oz.
Arsenal,	Isopropylamine salt of Imazapyr	241-346	0.125%-1%	2-8 oz.
Arsenal Powerline, or Polaris**		241-431 228-534		
Milestone	Triisopropanolammonium salt of 2-pyridine carboxylic acid	62719-519	0.1-0.5%	4-7 oz.
Rodeo***	Glyphosate	62719-324	2-7%	16-128 oz.
Induce, Cleancut, or Aqua Fac or other equivalent surfactant****	not applicable	not applicable	0.125%-1%	1-16 oz.
Thinvert (carrier)*****	Mixed with:	62719-324	per label rate	5 gal.
	Rodeo (Glyphosate)			
	Polaris (Imazapyr)	228-534		
	Escort XP (Metsulfuron-Methyl)	352-439		
	Milestone	62719-519		
Point Blank or other drift retardant	not applicable	not applicable	6-16 oz.	1-2 oz.
Carrier: Water	not applicable	not applicable	not applicable	not applicable

*Vastlan will only be utilized if the product is added in 2021 to the MA ROW Sensitive Area Materials List

** Imazapyr will not be applied on the same right-of-way in two consecutive years.

*** Rodeo or Krenite S are often applied in combination with Escort and Arsenal, Arsenal Powerline or Polaris.

**** Equivalent surfactants, drift retardants and basal oils will only be used in case those listed are no longer available or more effective alternatives become available.

***** Will be mixed in accordance with manufacturer's label.

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. Water)	Estimated Application Rate of Active Ingredient Per Acre
Rodeo	Glyphosate	62719-324	40%-50%	Per density of target stems
Garlon 4 Ultra	Triclopyr	62719-527	15%-30%	0.5-3 pints
Arsenal Arsenal Powerline or Polaris**	Isopropylamine salt of Imazapyr	241-346 241-431 228-534	3%-5% (mixed with Rodeo)	Per density of target stems
Carriers: Water or Windshield Washing Fluid	not applicable	not applicable	not applicable	not applicable

** Imazapyr will not be applied on the same right-of-way in two consecutive years.

Table 3: Tank Mixes for Low Volume Basal Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. Water)	Estimated Application Rate of Active Ingredient Per Acre
Garlon 4 Ultra	Triclopyr	62719-527	15%-30%	0.5-3 pints
Polaris**	Isopropylamine salt of Imazapyr	228-534	3%-5%	Per density of target stems
Carrier: Arborchem's low odor basal oil or equivalent	not applicable	not applicable	70%-85%	24-144 oz.

Table 4: Tank Mixes for Dormant Stem Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. Water)	Estimated Application Rate of Active Ingredient Per Acre
Garlon 4 Ultra	Triclopyr	62719-527	2%	Per density of target stems
Arsenal Powerline or Polaris	Isopropylamine salt of Imazapyr	241-346 241-431 228-534	0.5	6 pints per acre or less
Milestone	Triisopropanolammonium salt of 2-pyridine carboxylic acid	62719-519	0.33%	7 oz/acre or less
Carrier: Arborchem's low odor basal oil or equivalent	Not applicable	Not applicable	2-4%	Per density of target stems

8. PROCEDURES AND LOCATIONS FOR HANDLING, MIXING, AND LOADING HERBICIDE CONCENTRATES

National Grid retains independent contractors to accomplish all aspects of handling, mixing, and loading herbicide concentrates. As a contractual term, contractors are required to comply with all applicable laws, regulations, and rules pertaining to handling, mixing, and loading herbicide concentrates.

The majority of the handling, mixing, and loading of herbicide concentrates is done at the contractor's base location. If it is necessary to handle, mix, or load herbicide concentrates at any other location, the contractor is required to comply with herbicide label directions and existing regulations regarding setbacks from Sensitive Areas and safety precautions.

However, National Grid does expect that at a minimum, the following standards will be followed:

1. No handling, mixing, or loading of herbicide concentrates will be done on a right-of-way in the following situation:
    a. within the buffer zones adjacent to any drinking water supplies or surface water,
    b. within 100 feet of any other Sensitive Area.

2. All water to be used mixing herbicide solutions will be secured from a faucet or open bodies of water, that are not drinking water supplies.

3. If pumps are used they must be equipped with anti-siphoning devices.

4. Pumps and hoses used for water will not be used to pump or mix herbicides.

9. INDIVIDUALS SUPERVISING THE YOP

Overall supervision of the YOP will be performed by:

Mariclaire Rigby
Lead Vegetation Strategy Specialist
939 Southbridge Street
Worcester, MA 01610
(508) 860-6282

The New England Lead Vegetation Strategy Specialist is ultimately responsible for the preparation and implementation of this YOP including: work scheduling, procurement of necessary permits, municipal notifications, local and state officials, or other interested parties, and for ensuring overall compliance with the VMP and this YOP.

Coordination of the field application of the YOP, including prescription of herbicides, general application methods for each right-of-way, and contractor selection will be performed by National Grid Vegetation Operations:

Seth Bernatchez
Manager
164 Viscoloid Ave
Leominster, MA 01453
(978) 725-1493

Jonathan Duval
Forestry Supervisor
1250 Brayton Point Rd
Somerset, MA 02725
(978) 840-3816

Eric George
Forestry Supervisor
1101 Turnpike St
North Andover, MA 01845
(978) 725-1046

10. CONTRACTORS THAT WILL PERFORM HERBICIDE TREATMENTS

National Grid retains independent, professional, experienced contractors to perform the treatment applications. The contractor's supervisors and foremen are responsible for: field level implementation of this YOP, coordinating and observing the daily activities of the treatment crews, providing liaison between National Grid and landowners, local officials or other interested parties, and ensuring compliance with the VMP and YOP.

The following contractors may perform herbicide applications on National Grid's rights-of-way:

Lewis Tree Service, Inc.	Stanley Tree	Vegetation Control Service, Inc.
300 Lucius Gordon Drive	662 Great Road	2342 Main Street
West Henrietta, NY 14586	North Smithfield, RI	Athol, MA 01331
(585) 436-3208	(401) 765-4677	(978) 249-5348
Lucas Tree Experts	BluRoc	
12 Northbrook Drive	15 Atwood Dr, Suite 301	
Falmouth, ME 04105	Northampton, MA 01060	
(800) 339-8873	(413) 887-3653	

11. REMEDIAL SPILL AND EMERGENCY PLAN

This section is offered as a general procedural guide for responding to chemical spills or related accidents (related accidents include, but are not limited to fire, poisoning and vehicle accidents). National Grid contracts with independent, professional, certified herbicide applicators that are responsible for the containment, clean up and reporting of chemical spills or accidents. The following is, therefore, only a guide to the minimum resources that shall be available to the treatment crew in the event of a chemical spill or emergency:

Types of Chemical Spills that Require Action

Chemicals include, but are not limited to the following:

- Herbicides
- Bar and Chain Oil
- Motor and Hydraulic Oil/Fluids
- Diesel Fuel
- Gasoline
- Title 3 Hazmat Materials

Required Spill Response Equipment

As a minimum, the treatment crew should have available on the job site:

- ☐ YOP with Emergency Contact List
- ☐ Safety Data Sheets (SDS)
- ☐ Product Label
- ☐ Product Fact Sheets (when applicable)
- ☐ Appropriate Absorbent Material
- ☐ Shovel
- ☐ Broom
- ☐ Flagging
- ☐ Leak Proof Container
- ☐ Heavy-duty Plastic Bags

Personal Contact

In the event of **Personal Contact** with hazardous chemicals:

- ☐ Wash affected area with plenty of soap and water
- ☐ Change clothing which has absorbed hazardous chemicals
- ☐ If necessary, contact a physician
- ☐ If necessary, contact the proper emergency services
  - ☐ If necessary, follow the procedures for Reportable or Non-Reportable Spills as outlined below
- ☐ Avoid breathing the fumes of hazardous chemicals.

Clean-up Procedures

Education and attention will constantly be directed at accident and spill prevention, however, in the event of an unfortunate incident, a spill response check list is included below (Table 8) which can be filled out and used as a procedural guide.

Reference Tables (information subject to change as necessary)

Table 5: Herbicide Manufacturers

Manufacturer	Telephone Number
BASF Corporation	(800) 832-4357
Corteva/ Dow Agro Sciences	(800) 992-5994
NuFarm	(877) 325-1840
Albaugh Inc	800-424-9300

Table 6: State Agencies

State Agency	Telephone Number	Special Instructions
MDAR, Pesticide Bureau	(617) 626-1700	A.S.A.P. (within 48 hours)
Massachusetts Department of Environmental Protection, Emergency Response Section	Emergency Response Coordinator:	For emergencies involving reportable quantities of hazardous materials, call within 2 hours.
	(617) 292-5507	
	Southeast Region: (508) 946-2700	Required info:
	Northeast Region: (978) 694-3200	City/town, street address, site name (if applicable), material, quantity released, environment impact
	Central Region: 508) 792-7650	
	Western Region: (413) 784-1100	
Massachusetts Poison Information Centers	800-682-9211	For medical emergencies involving suspected or known pesticide poisoning symptoms

Table 7: Emergency Services

Emergency Service	Telephone Number	Special Instructions
Massachusetts State Police	(508) 820-2121	Framingham, after hours number
Local Police/Fire Dept	911	
ChemTrec	(800) 424-9300	
Clean Harbors	(800) OIL-TANK	
Pesticide Hotline	(800) 858-7378	PST: 5:30 am - 4:30 pm web:www.NPIC.orst.edu

Table 8: National Grid Contacts in the case of a spill or accident

Name	Telephone Number	Address
Jonathan Duval	(508) 730-4007	National Grid 1250 Brayton Point Rd Somerset, MA 02725
Eric George	(978) 725-1046	National Grid 110 Turnpike Street North Andover, MA 01845
Seth Bernatchez	(978) 725-1493	National Grid 164 Viscoloid Ave Leominster, MA 01453

Table 9: Remedial Plan to Address Spills

REPORTABLE SPILLS

(Spills of a reportable quantity of material, in accordance with 310 CMR 40.0000):

FOLLOW STEPS 1-11 and contact the National Grid Transmission Forester

NON-REPORTABLE SPILLS

FOLLOW STEPS 1 - 4, 7 - 11 and contact the National Grid Transmission Forester

Order	ACTION		Done (√)
1	Use any and all PPE as directed by product label or SDS.		
2	Cordon-off spill area to unauthorized people and traffic to reduce the spread and exposure of the spill.		
3	Identify source of spill and apply corrective action, if possible stop or limit any additional amount of spilled product.		
4	Contain spill and confine the spread by damming or diking with soil, clay or other absorbent materials.		
5	Report spill of "reportable quantity" to the Massachusetts DEP and DAR:		
	Massachusetts MDAR, Pesticide Bureau	(617) 626-1700	
	Massachusetts Department of Environmental Protection, Emergency Response Section (appropriate region)	See Table 5	
6	If the spill cannot be contained or cleaned-up properly, or if there is a threat of contamination to any bodies of water, immediately contact any of the following applicable emergency response personnel:		
	Local fire, police, rescue	911	
	National Grid Transmission Forester	See Table 7	
	Product Manufacturer(s)		
	1	See Table 4 and/or Herbicide Label (Appendix 8)	
	2		
	3		
	ChemTrec	(800) 424-9300	
	Additional Emergency Personnel		
	If there is a doubt as to who should be notified, contact Massachusetts State Police.	(508) 820-2121 or 911	
7	Remain at the scene to provide information and assistance to responding emergency clean-up crews.		
8	Refer to the various sources of information relative to handling and clean up of spilled product.		
9	If possible, complete the process of "soaking up" with absorbent materials.		
10	Sweep or shovel contaminated products and soil into leak proof containers for proper disposal at approved location.		
11	Spread activated charcoal over spill area to inactivate any residual herbicide.		

APPENDIX 1

33 CMR 11.00 RIGHTS-OF-WAY MANAGEMENT

333 CMR 11.00: RIGHTS OF WAY MANAGEMENT

Section

11.01 Purpose
11.02 Definitions
11.03 General Provisions
11.04 Sensitive Area Restrictions
11.05 Vegetation Management Plan (VMP)
11.06 Yearly Operational Plan (YOP)
11.07 Public Notification
11.08 Notice of Modification and Revocation
11.09 Right-of-Appeal
11.10 Penalties
11.11 Rights-of-Way Advisory Panel

11.01: Purpose

The purpose of 333 CMR 11.00 is to establish a statewide and uniform regulatory process which will minimize the uses of, and potential impacts from herbicides in rights-of-way on human health and the environment while allowing for the benefits to public safety provided by the selective use of herbicides. Specific goals of 333 CMR 11.00 are to:

1. Ensure that an Integrated Pest Management (IPM) approach to vegetation management is utilized on all rights-of-way covered by 333 CMR 11.00.
2. Establish standards, requirements and procedures necessary to prevent unreasonable risks to humans or the environment, taking into account the economic, social and environmental costs and benefits of the use of any pesticide.
3. Ensure ample opportunity for public and municipal agency input on potential impacts of herbicide application to rights-of-way in environmentally sensitive areas.
4. Establish a mechanism for public and municipal review of rights-of-way maintenance plans.

11.02: Definitions

For the purposes of 333 CMR 11.00, unless the context clearly requires otherwise, the following definitions shall apply:

Agricultural Area includes, but is not limited to, actively cultivated gardens, greenhouses, orchards, fields, pastures, and other areas under cultivation or agricultural management.

Applicant, any person representing any federal, state or local government or agency, utility, railroad or pipeline, that intends to maintain a right-of-way in the Commonwealth by application of herbicides.

Associated Surface Water Body, as identified on the most current available maps prepared by the Department of Environmental Protection, any body of water that is hydrologically connected to a Class A surface water source.

Ballast, the coarse gravel or crushed rock on which the ties, tracks and switching, signaling and communication devices of a railroad are laid.

Broadcast, any non-selective herbicide application technique which results in application to all vegetation within a target area.

Certified Vernal Pool, a confined basin depression, certified and mapped by NHESP pursuant to the provisions of 310 CMR 10.57(2)(a)5,6, which, at least in most years, holds water for a minimum of two continuous months during the spring and/or summer, and which is free of adult fish populations.

Certified Vernal Pool Habitat, that vernal pool habitat which has been certified and mapped by NHESP pursuant to the provisions of 310 CMR 10.57(2)(a)5,6 or, in the event that such habitat has not been mapped, the area extending 100 feet horizontally outward from the boundary of any Certified Vernal Pool.

Class A Waters, waters which are designated as a source of public water supply, as defined in 314 CMR 4.05(3)(a).

Class B Drinking Water Intakes, intakes to Class B waters suitable as sources of public water supply with appropriate treatment, as defined at 314 CMR 4.05(3)(b) and as identified on the most current available maps prepared by the Department of Environmental Protection.

Department, the Department of Agricultural Resources.

FIFRA, the Federal Insecticide, Fungicide and Rodenticide Act, Public Law 92- 516.

Foliar Treatment, any technique which applies herbicide to leaves of target vegetation.

Inhabited Area, any area where people generally live, work or gather, including, but not limited to, any residence, school, hospital, park or recreational facility.

Interim Wellhead Protection Area (IWPA), for public water systems using wells or well fields that lack a Department of Environmental Protection-approved Zone II, an interim wellhead protection area, as that term is defined in the Massachusetts drinking water regulations, 310 CMR 22.02, and as identified on the most current available maps prepared by the Department of Environmental Protection, shall apply. Generally, this is a 1/2- mile radius for sources whose approved pumping rate is 100,000 gallons per day or greater. For smaller sources, the radius in feet is determined by multiplying the approved pumping rate in gallons per minute by 32 and adding 400.

Limited Application Waiver, a waiver from the requirements of 333 CMR 11.05 and 11.06, granted at the Department's sole discretion pursuant to 333 CMR 11.03(14), when the reason for the application is emergency public health or safety or when the application is for one time only.

Limited Spray Area, any area that is both within a Right-of-Way and within:

(a) any Zone II or IWPA
(b) a distance of between 100 feet and 400 feet of any Class A Surface Water Source
(c) a distance of between 10 and 200 feet of any tributary or associated surface water body where the tributary or associated surface water body runs outside the Zone A for the Class A surface water source
(d) a lateral distance of between 100 and 200 feet for 400 feet upstream, on both sides of the river, of a Class B Drinking Water Intake
(e) a distance of between 50 and 100 feet of any identified Private Well
(f) a distance of between 10 and 100 feet of any Wetlands or Water Over Wetlands
(g) a distance of between 10 feet from the mean annual high water line of any river and the outer boundary of the Riverfront Area
(h) a distance of between ten feet from any Certified Vernal Pool and the outer boundary of any Certified Vernal Pool Habitat
(i) a distance of 100 feet of any Agricultural or Inhabited Area.

Low Pressure, pressure under 60 pounds per square inch (psi).

Maps, United States Geological Survey maps of scale 1:25,000 or other maps, as determined by the Department, which are of such accuracy and scale to provide sufficient detail so that sensitive areas can be delineated.

NHESP, the Natural Heritage and Endangered Species Program within the Massachusetts Division of Fisheries and Wildlife.

No-Spray Area, any area that is both within a Right-of-Way and within:

(a) any Zone I
(b) 100 feet of any Class A Surface Water Source
(c) 100 feet of any tributary or associated surface water body where the tributary or associated surface water body runs within 400 feet of a Class A surface water source
(d) 10 feet of any tributary or associated surface water body where the tributary or associated surface water body is at a distance greater than 400 feet from a Class A surface water source
(e) a lateral distance of 100 feet for 400 feet upstream, on both sides of the river, of a Class B Drinking Water Intake
(f) 50 feet of any identified Private Well
(g) 10 feet of any Wetlands or Water Over Wetlands
(h) 10 feet of the mean annual high-water line of any river
(i) 10 feet of any Certified Vernal Pool.

Person, an individual, association, partnership, corporation, company, business organization, trust, estate, the Commonwealth or its political subdivisions, administrative agencies, public or quasi-public corporation or body, or any other

legal entity or its legal representatives, agent or assignee, or a group of persons.

Person Aggrieved, any person who, because of an act or failure to act by the Department may suffer an injury in fact which is different either in kind or magnitude from that suffered by the general public and which is within the scope of the interests identified in 333 CMR 11.00. Such person must specify in writing sufficient facts to allow the Department to determine whether or not the person is in fact aggrieved.

Private Well, any private drinking water supply identified by the local Board of Health, the well owner or the Department of Agricultural Resources.

Private Well Registry, a registry of private wells located within 100 feet of a right-of-way which is maintained by the Department of Agricultural Resources. Homeowners must notify the Department by completing a registration form which is available directly from the Department or online at the Department website.

Public Ground Water Source, a source of water for a Public Water Supply System, as that term is defined in the Massachusetts drinking water regulations at 310 CMR 22.02.

Public Water Supplier, as defined at 310 CMR 22.02(1), any person who owns or operates a public water supply system.

Right(s)-of-Way (ROW), any roadway, or thoroughfare on which public passage is made and any corridor of land over which facilities such as railroads, powerlines, pipelines, conduits, channels or communication lines or bicycle paths are located.

Rights-of-Way Advisory Panel, a panel established to advise the Department on issues relating to 333 CMR 11.00 and to fulfill specific functions as detailed within 333 CMR 11.05 and 11.11.

River, a river as defined at 310 CMR 10.04 and as identified on the most current available maps prepared by the Department of Environmental Protection.

Riverfront Area, a riverfront area as defined at 310 CMR 10.58(2) and as identified on the most current available maps prepared by the Department of Environmental Protection. In general, this term shall mean the area between the mean annual high-water line of a perennially flowing river and a parallel line 200 feet away.

Selective Application, any application of herbicides, in such a manner that the delivery to the target vegetation is optimized and delivery to non-target vegetation and the environment is minimized.

Sensitive Areas, as defined in 333 CMR 11.04, any areas within Rights-of-Way, including No-Spray and Limited-Spray Areas, in which public health, environmental or agricultural concerns warrant special protection to further minimize risks of unreasonable adverse effects.

State-listed Species, any species on the Massachusetts list of Endangered, Threatened, and Special Concern Species as described in the Massachusetts Endangered Species Act (M.G.L. c. 131A; 321 CMR 10.02).

State-listed Species Habitat, the Estimated Habitats of Rare Wildlife (310 CMR 10.59 and 10.37) and the Priority Habitats for State-listed Species (321 CMR 10.02) as shown on the most recent edition of the Massachusetts Natural Heritage Atlas prepared by NHESP.

Stem Treatment, any technique including, but not limited to, stump, basal, stem, injection, banding, frill, or girdle and any other technique which delivers herbicide at low pressure to the stump, base or stem of the target vegetation.

Surface Water Source, any lake, pond, reservoir, river, stream or impoundment designated as a public water supply in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00, as identified on the most current available maps prepared by the Department of Environmental Protection.

Target Vegetation, any plant species which has the potential to interfere with the operation and safety of the right-of-way.

Touch-up Application, any limited application of herbicides following an initial treatment, which is necessary to achieve the desired vegetation control.

Tributary, as identified on the most current available maps prepared by the Department of Environmental Protection, any body of running, or intermittently running, water which moves in a definite channel, naturally or artificially created, in the ground due to a hydraulic gradient, and which ultimately flows into a Class A surface water source, as defined in 314 CMR 4.05(3)(a).

Vegetation Management Plan (VMP), a long term management plan for the applicant's right-of-way system which describes the intended program for vegetation control over a five year period.

Vernal Pool, see Certified Vernal Pool.

Water Over Wetlands, the ocean or any estuary, lake or pond as defined at 310 CMR 10.04.

Wetland(s),
any of the following areas as defined in 310 CMR 10.02(1)(a), (b), (c) and (f):

(a) Any bank,
any freshwater wetland,
any coastal wetland,
any beach,
any dune,
any flat,
any marsh,
or any swamp

on

the ocean
any estuary
any creek
bordering any river
any stream
any pond
or any lake

(b) Land under any of the water bodies listed above
(c) Land subject to tidal action
(f) Riverfront area.

Wetlands Determination, a written determination of the boundaries of Wetlands and boundaries of areas within 100 feet of Wetlands in accordance with the regulations of the Department of Environmental Protection (DEP) at 310 CMR 10.05(3)(a)1. and 2.. 310 CMR 10.03(6)(b) require applicants not eligible for a public utility exemption to submit these determinations with their VMPs if they will apply herbicides within 100 feet of wetlands and will not submit a Notice of Intent under M.G.L.c. 131, §40, the Wetlands Protection Act. In order to obtain a Wetlands Determination, the applicant should submit a request to the conservation commission on maps of a scale that will enable the conservation commission or Department of Environmental Protection to find and delineate the boundaries of Wetlands and buffer zones within the vicinity of the right-of-way herbicide management area. To be considered "valid", the Wetlands Determination should be made no sooner than six months immediately prior to the submission of the Vegetation Management Plan. The Wetlands Determination shall cover the period of the Vegetation Management Plan only and shall expire at the end of the five year period of that Vegetation Management Plan.

Yearly Operational Plan (YOP), the yearly operational plan which describes the detailed vegetation management operation for the calendar year consistent with the terms of the long term Vegetation Management Plan.

Zone A, as identified on the most current available maps prepared by the Department of Environmental Protection, the protective land area for a Surface Water Source, Class A water source, Tributary, or Associated Surface Water Body defined in 310 CMR 22.02 as:

(a) the land area between the Class A surface water source and the upper boundary of the bank;
(b) the land area within a 400 foot lateral distance from the upper boundary of the bank of a Class A surface water source, as defined in 314 CMR 4.05(3)(a); and
(c) the land area within a 200 foot lateral distance from the upper boundary of the bank of a Tributary or Associated Surface Water Body.

Zone I, as identified on the most current available maps prepared by the Department of Environmental Protection and as defined at 310 CMR 22.02, the protective radius required around a public water supply well or wellfield. For public water system wells with approved yields of 100,000 gallons per day (gpd) or greater, the protective radius is 400 feet. Tubular wellfields require a 250 foot protective radius. Protective radii for all other public water system wells are determined by the following equation: Zone I radius in feet = (150 x log of pumping rate in gpd) –350.

Zone II, as identified on the most current available maps prepared by the Department of Environmental Protection and as defined at 310 CMR 22.02, the aquifer recharge area for a public water supply well or wellfield.

11.03: General Provisions

(1) No person shall use an herbicide for the purpose of clearing or maintaining a right-of-way unless appropriately certified by the Department, or licensed by the Department and working under the on-site supervision of an appropriately certified applicator.

(2) No person shall use an herbicide for the purpose of clearing or maintaining a right-of-way except in accordance with a Vegetation Management Plan (VMP) and a Yearly Operational Plan (YOP) as approved by the Department. The YOP shall be available at the work site at all times during herbicide applications and be made available to the Department and municipal officials including the Conservation Commission and Board of Health upon reasonable request.

(3) No person shall handle, mix or load an herbicide concentrate on a right-of- way within 100 feet of a sensitive area.

(4) The perimeter of any sensitive areas which are not readily identifiable on the ROW shall be identified with a clearly visible marker system, consistent with the VMP, prior to any herbicide application.

(5) No foliar application of herbicides shall be used to control vegetation greater than 12 feet in height except for side trimming.

(6) No herbicide shall be applied when the wind velocity is such that there is a high propensity to drift off target and/or during measurable precipitation, and no person shall apply herbicides in such a manner that results in drift into any No-spray Area.

(7) No person shall apply herbicides by aircraft for the purpose of clearing or maintaining a right-of-way.

(8) No touch-up applications shall be carried out except under the following conditions:

(a) Touch-up applications must occur within 12 months of the initial application.
(b) All applicable public notification procedures of M.G.L. c. 132B, § 6B, as outlined in 333 CMR 11.07(1) and (3), are followed.
(c) No more than 10% of the initially identified target vegetation on the applicant's right-of-way in any municipality may be treated and the total amount of herbicide applied in any one year shall not exceed the limits specified by the label or Yearly Operational Plan.
(d) The Department may impose such additional restrictions or conditions on the use of herbicides as it deems necessary to protect public health and the environment.

(9) The Department will maintain mailing lists of individuals and groups desiring to obtain notices on various aspects of the Program.

(10) No person shall apply any herbicide identified as a Potential Ground Water Contaminant pursuant to 333 CMR 12.00 to a right-of-way.

(11) No person shall use an herbicide for the purpose of clearing or maintaining a right-of-way unless that person has obtained the most current available map of public ground water sources from the Department of Environmental Protection.

(12) No person shall use an herbicide for the purpose of clearing or maintaining a right-of-way unless that person has done one or more of the following:

(a) obtained a current list of identified Private Wells within 100 feet of the right-of-way from the Board of Health, or
(b) obtained a current list of all private wells, within 100 feet of the right of way from the Department of Agricultural Resources private well registry; or
(c) followed an alternative Private Well identification method outlined in an approved YOP.

(13) The applicator shall provide any employee of any state agency, or authority as defined in M.G.L. c. 3, § 39, when such employee is, within a right-of-way, using pesticides, supervising the use of pesticides, or present during the use of pesticides, with personal protective equipment and clothing. Applicators should note that other federal or state laws or regulations pertaining to pesticide applications may require this personal protective equipment to include protections according to Material Safety Data Sheets (MSDS's), the product label, and any other supporting technical data supplied by the manufacturer.

(14) Notwithstanding the provisions of 333 CMR 11.03(2) or other provisions of 333 CMR 11.00, the Department may, at its sole discretion, issue Limited Application Waivers to applicants wishing to apply herbicides to clear or maintain rights-of-way without VMPs or YOPs, but only under the following conditions:

(a) The applicant must demonstrate either:
1. that the application will not occur more than once in a five-year period unless a VMP and a YOP are prepared and all other requirements of 333 CMR 11.00 are met; or
2. that the application is necessary to protect public health or safety.

(b) The applicant must still adhere to all public notification requirements established at 333 CMR 11.07(1) and (3).

(c) The applicant must provide the Department with a letter establishing the concurrence of the chief elected official or board of selectmen of the municipality where the application is to be made.

(d) The applicant may only use herbicides on the Department's "Herbicides Recommended for Use in Sensitive Areas List."

(e) If the application could impact Wetlands, the Department recommends that the applicant send a copy of its application for a Limited Application Waiver to the Department of Environmental Protection's Division of Wetlands and Waterways no less than 21 days before the proposed application.

(f) It should be noted that, with certain exceptions for public utilities, wetlands regulations at 310 CMR 10.03(6)(b) currently require

Wetlands Determinations prior to any application within 100 feet of a Wetland.

Limited Application Waivers shall be issued solely at the Department's discretion, and the Department may impose such additional restrictions or conditions on the use of herbicides as it deems necessary to protect public health and the environment.

11.04: Sensitive Area Restrictions

(1) General

In any sensitive area:

(a) No more than the minimum labeled rate of herbicide for the appropriate site, pest, and application method shall be applied.

(b) Herbicides shall only be applied selectively by low pressure, using foliar techniques or basal or cut-stump applications, or other method approved for use by the Department.

(c) No person shall apply herbicides for the purpose of clearing or maintaining a right-of-way in such a manner that results in drift to any area within 10 feet of standing or flowing water in a wetland; or area within 400 feet of a public drinking water supply well; or area within 100 feet of any Class A surface water used as a public water supply; or area within 50 feet of a Private Well.

(d) Only herbicides specified by the Department as acceptable for use in sensitive areas pursuant to the Cooperative Agreement executed between the Department of Agricultural Resources and the Department of Environmental Protection on July 1-2, 1987, or future amendments thereto, shall be used in sensitive areas. Applicants proposing to use an herbicide which has been registered for use on rights-of-way but has not yet been evaluated pursuant to the provisions of the Cooperative Agreement may request that such herbicides be evaluated pursuant to said provisions. For an herbicide that has been evaluated pursuant to the provisions of the Cooperative Agreement, applicants proposing to use such herbicide in a manner inconsistent with the terms and conditions of use imposed in the guidelines may request a modification or waiver of such terms or conditions. A request for such modification or waiver shall provide a detailed rationale for use, with all relevant data including but not limited to environmental fate, efficacy and human health effects of the proposed herbicide. Such herbicides and/or uses shall be subject to the evaluation standards adopted by the Departments of Agricultural Resources and Environmental Protection in the Cooperative Agreement.

Commentary

Applicants not eligible for the public utilities exemption from the Wetlands Protection Act outlined at 310 CMR 10.03(6)(a), who wish to apply pesticides registered for use in Massachusetts to rights-of-way, may choose to apply herbicides determined to be suitable for use in sensitive areas in accordance with the provisions of the Cooperative Agreement mentioned above or, alternatively, such applicants may

proceed pursuant to the provisions of 310 CMR 10.00 as authorized by M.G.L. c. 131, § 40.

(e) The Department may impose such additional restrictions or conditions on the use of herbicides within or adjacent to sensitive areas as it determines necessary to protect human health or the environment. Such changes may be proposed by a municipal agency or individual during the public comment period.

(f) In the event of a question or dispute as to which setback applies to a sensitive area, the most restrictive setback shall apply.

(2) Water Supplies

(a) Public Ground Water Sources

1. No herbicides shall be applied within a Zone I.
2. No herbicides shall be applied within a Zone II or IWPA unless:
   a. A minimum of 24 months has elapsed since the last application to the site; and
   b. Herbicides are applied selectively by low pressure, using foliar techniques or basal or cut-stump applications.

(b) Class A Public Surface Water Sources, Associated Surface Water Bodies, Tributaries and Class B Drinking Water Intakes

1. No herbicides shall be applied within 100 feet of any Class A public surface water source.
2. No herbicides shall be applied within 100 feet of any tributary or associated surface water body located within the Zone A of a Class A public surface water source, or within 10 feet of any tributary or associated surface water body located outside of the Zone A of the Class A public surface water source.
3. No herbicides shall be applied within a lateral distance of 100 feet for 400 feet upstream of any Class B Drinking Water Intake.
4. No herbicides shall be applied within a distance of between 100 feet from any Class A surface water source and the outer boundary of any Zone A, or within a distance of between 10 feet and the outer boundary of the Zone A for any tributary or associated surface water body located outside of the Zone A of a Class A surface water source, or within a lateral distance of between 100 and 200 feet for 400 feet upstream of a Class B Drinking Water Intake, unless:

   a. A minimum of 24 months has elapsed since the last application to the site; and
   b. Herbicides are applied selectively by low pressure, using foliar techniques or basal or cut-stump applications.

(c) Private Wells

1. No herbicides shall be applied within 50 feet of an identified Private Well.

2. No herbicides shall be applied within a distance of between 50 feet and 100 feet of an identified Private Well, unless:

a. A minimum of 24 months has elapsed since the last application to the site; and

b. Herbicides are applied selectively by low pressure, using foliar techniques or basal or cut-stump applications.

(3) State-listed Species Habitat

(a) Any person proposing to apply an herbicide within any State-listed Species Habitat who does not have a current Yearly Operational Plan approved in writing by the Division of Fisheries and Wildlife pursuant to 321 CMR 10.14(12), shall submit all necessary materials required for review pursuant to 321 CMR 10.18.

(b)The management of vegetation within existing utility rights-of-way shall be exempt from the requirements of 321 CMR 10.18 through 10.23, provided that the management is carried out in accordance with a Yearly Operational Plan approved in writing by the Division of Fisheries and Wildlife, pursuant to 321 CMR 10.14(12).

(c) No person shall apply an herbicide within State-listed Species Habitat unless the application is approved by the Division of Fisheries and Wildlife pursuant to 333 CMR 11.04 (3a and 3b), and such approval is submitted to the Department.

(4) Wetlands, Waters Over Wetlands, Riverfront Areas, and Certified Vernal Pools

(a) No herbicide shall be applied on or within 10 feet of a Wetland or Water Over a Wetland, within 10 feet of the mean annual high-water line of any River, or within 10 feet of any Certified Vernal Pool.

(b) No herbicide shall be applied on or within a distance of between 10 feet and 100 feet of any Wetland or Water Over a Wetland, within a distance of 10 feet from the mean annual high-water line of any River and the outer boundary of any Riverfront Area, or within a distance of 10 feet from any Certified Vernal Pool and the outer boundary of any Certified Vernal Pool Habitat unless:

1. A minimum of 12 months has elapsed since the last application to the site; and
2. Herbicides are applied selectively by low pressure, using foliar techniques or basal or cut-stump applications.

(c) Notwithstanding 333 CMR 11.04(4) (a) –(b), public utilities providing electric, gas, water, telephone, telegraph and other telecommunication services (and other applicants, if consistent with all relevant provisions of the Massachusetts Wetlands Protection Act and its regulations in effect at the time of application) may apply herbicides on or within 10 feet of a Wetland in accordance with the following conditions:

1. Submission of a study, the design of which is subject to prior approval by the Departments of Agricultural Resources and Environmental Protection, evaluating impacts of the proposed vegetation management

program utilizing herbicides on or within 10 feet of Wetlands, and comparing those impacts to those which would result if only non-chemical control methods were used in these areas. The study must detail vegetation management practices and use patterns specific to those used by the type of entity submitting the study; and

2. A finding by the Department, after consultation with the Rights-of-Way Advisory Panel, that the proposed vegetation management program utilizing herbicides on or within 10 feet of Wetlands will result in less impacts to the Wetlands than mechanical control.

3. Notwithstanding the above, no herbicides shall be applied on or within ten feet of any standing or flowing water in a Wetland.

(5) Inhabited and Agricultural Areas

No foliar herbicide shall be applied within 100 feet of any Inhabited Area or any Agricultural Area unless:

1. A minimum of 12 months has elapsed since the last application to the site; and
2. Herbicides are applied selectively by low pressure, using foliar techniques or basal or cut-stump applications.

11.05: Vegetation Management Plan (VMP)

(1) General.

(a) Unless otherwise specified by the Department, all VMPs should be submitted by the applicant no later than September 1st prior to the calendar year of the proposed first year of maintenance. All approved VMPs shall be effective for a five year period unless otherwise modified, or revoked by the Department.

(b) The VMP shall be presented on forms and/or format approved by the Department.

(2) Requirements. The VMP shall include, but not be limited to, the following:

(a) General statement of goals and objectives of the VMP.

(b) Identification of target vegetation.

(c) Intended methods of vegetation management and rationale for use, including vegetation control techniques, equipment proposed for use, timing of applications and alternative control procedures.

(d) Discussion of justification for proposed herbicide applications, including a description of the alternative control methods considered and the reasons that they were rejected.

(e) Methods, references and sources for identifying sensitive areas and control strategies proposed for sensitive areas. Applicants should note that Department of Environmental Protection regulations at 310 CMR 10.03(6)(b) currently require Wetlands Determinations for applicants that are not eligible for a public utility exemption.

(f) Operational guidelines for applicators relative to herbicide use.

(g) Identification and qualifications of individuals developing and submitting a plan.
(h) A detailed description of the IPM Program, showing how it will minimize the amount and frequency of herbicide application.
(i) Description of alternative land use provisions or agreements that may be established with individuals, state, federal or municipal agencies that would minimize the need for herbicides, including the rationale for accepting or denying any reasonable request made by any individual.
(j) Description of a remedial plan to address spills and related accidents.
(k) For state agencies and authorities as defined in M.G.L. c. 3, § 39, a description of the applicant's policy to eliminate or, if necessary, reduce the use of pesticides for any vegetation management purpose along roadways, and a demonstration that, for the proposed application, the costs of non-chemical vegetation control significantly outweigh the benefits.

(3) Public Notice, Review and Comment.

(a) Upon receipt of the proposed VMP, the Department shall schedule and hold appropriate regional public hearings affording all interested parties the opportunity to comment, both at the hearings and in writing to the Department, on the proposed plan.
(b) At least 21 days prior to the public hearings, the Department shall publish notice of the hearings in the Environmental Monitor and regionally located newspapers, and send notice to municipalities covered by the plan and to the appropriate mailing list. The notice will include locations where copies of the VMP can be reviewed.
(c) The public shall have no less than 45 days, starting from publication of the Environmental Monitor notice, to comment upon proposed VMPs, unless the Department extends the comment period for good cause.
(d) Wherever a chief elected official, Board of Health or Conservation Commission in a municipality covered by the proposed VMP requests a copy of the proposed plan, the applicant shall, at least 21 days prior to the end of the public comment period, respond to this request. The response must either include a copy of the proposed VMP, or an Internet address where the VMP may be viewed and a note that a hard copy will be provided promptly upon further request.

(4) Disposition of VMP.

(a) 25 copies of the proposed VMP shall be submitted to the Department. The Department shall distribute copies of the proposed VMP to each member of the Rights-of-Way Advisory Panel. The Department may, at its sole discretion, allow electronic presentation of the VMP in lieu of some or all of the 25 copies that would otherwise be submitted pursuant to this subsection.
(b) Within 30 days of the end of the public comment period unless extended for good cause, the Rights-of-Way Advisory Panel shall review the VMPs and recommend in writing to the Department

approval, denial or modification of each VMP; if necessary, the Advisory Panel may request additional information from the applicant.

(c) Within 21 days of the end of the Rights-of-Way Advisory Panel review period, unless extended by the Department for good cause, the Department will notify the applicant and the Advisory Panel in writing one of the following:

1. request for additional information or modification; or
2. denial of VMP; or
3. approval of VMP.

(d) The VMP may be modified, withdrawn or amended by the applicant through a written request sent by certified mail to the Department.

(e) Resubmission of a denied VMP, updating of a VMP, or a significant amendment to an approved VMP shall be processed according to 333 CMR 11.05.

(f) The applicant must send a copy of the approved VMP, or an Internet address where the VMP may be viewed and a note that a hard copy will be provided promptly upon further request, to the chief elected official, Board of Health, and Conservation Commission in each municipality covered by the plan.

(5) Time for Action. Non-action by the Department on a VMP within the time specified herein does not constitute approval of the submitted plan. In the event that the Department fails to notify the applicant of a decision within the time specified above and upon written request from the applicant, the Commissioner must issue a finding within ten days of receipt stating the reason for the delay and providing an estimated completion date.

11.06: Yearly Operational Plan (YOP)

(1) General.

(a) The applicant is responsible for the accuracy and completeness of all information submitted with the YOP. The YOP shall be consistent with the objectives of the VMP and shall describe the intended operational program for that calendar year.

(b) The YOP shall be presented on forms and in a format approved by the Department.

(2) Requirements. The YOP shall include but not be limited to the following:

(a) Maps locating the rights-of-way and sensitive areas not readily identifiable in the field;

(b) Herbicides proposed including EPA Registration numbers, application rates, carriers and adjuvants;

(c) Herbicide application techniques and alternative control procedures proposed.

(d) The name, address and phone number of the company which will perform any herbicide treatment;

(e) Identification of target vegetation;

(f) The name, address and phone number of the individual representing the YOP applicant;

(g) Description of methods used to flag or otherwise designate sensitive areas on the right-of-way;
(h) Herbicide Fact Sheets as approved by the Department; and
(i) Procedures and locations for handling, mixing and loading of herbicide concentrates.

(3) Public Notice, Review and Comment.

(a) Upon submittal of the YOP for approval, the Department will publish a notice in the Environmental Monitor. Said notice shall be provided by the applicant and shall include the information on the municipalities through which the rights-of-way pass, a brief description of the intended program, and the procedure for public review and comment. The Department shall send notification of the publication to the applicant and the appropriate mailing list.
(b) Upon submittal of the YOP to the Department, the applicant shall provide by certified mail under separate cover to the Board of Health, Conservation Commission, chief elected municipal official, and where applicable, the Massachusetts Water Resources Authority and Massachusetts Department of Conservation and Recreation, a copy of the proposed YOP (or an Internet address where the proposed YOP may be viewed and a note that a hard copy will be provided promptly upon request) and the Environmental Monitor notice for the municipality or municipalities in which the herbicide treatment is proposed. Community water suppliers shall receive electronic information or a one page notification by mail which provides details about where to receive more information. The applicant shall maintain copies of the packet sent to municipalities and certified mail receipts. The applicant shall make copies of the packet, certified mail receipts, and any further correspondence regarding hard copies of YOPs in lieu of Internet viewing, available to the Department upon request.
(c) The Department shall allow a 45-day comment period on proposed YOPs, unless extended for good cause, commencing with the publication of the notice in the Environmental Monitor and receipt of the proposed YOP and Environmental Monitor notice by each municipality.
(d) The Department may approve, deny or modify YOPs after the 45-day comment period has expired.

(4) Disposition of YOP.

(a) The applicant shall submit the YOP to the Department at least 90 days prior to the proposed commencement of application to allow completion of the comment and review period.
(b) The Department shall review the YOP to ensure that the YOP is consistent with the approved VMP. Any inconsistencies or deficiencies will be noted by the Department and returned with the YOP to the applicant.

(c) Where practical, the Department shall approve or deny the YOP within 90 days of receipt. The Department will provide notice of the decision to the applicant, municipal agencies and commentators in writing.

(d) The approved YOP in conjunction with the VMP shall govern the application of herbicide for a period not to exceed 12 months in accordance with other laws and regulations of the State and Federal governments and impose such conditions as necessary to minimize the risk of adverse effects on human health and the environment.

(5) Time for Action. Non-action by the Department on a YOP within the time specified herein does not constitute approval of the submitted plan. In the event that the Department fails to notify the applicant of a decision within the time specified above and upon a written request from the applicant, the Commissioner must issue a finding within ten days of receipt stating the reason for the delay and providing an estimated completion date.

11.07: Public Notification

(1) At least 21 days in advance of application of herbicide to a right-of-way in any city or town, the applicant shall notify the Department, the board of health and the local public water supplier and, by registered mail, the mayor, city manager or chairman of the board of selectman, and the conservation commission in the municipality where the right-of-way lies. The notice shall include the following information: the approximate dates on which such herbicide application shall commence and conclude, provided however, that said application shall not commence more than ten days before nor conclude more than ten days after said approximate dates; the method and locations of application; a Department-approved Herbicide Fact Sheet on the active ingredient(s) of the herbicide(s) used; the EPA registration number(s) for the herbicide(s) used; the name, title, business address and phone number of the certified commercial applicator or licensed applicator, or the contractor, employer or employees responsible for carrying out the application. Where specific information required for this notice is already contained in the current YOP that is on file with the local official, the applicant may incorporate the appropriate pages of the YOP by reference in its notice to that official, indicating that these pages are also directly available from the applicant upon request.

(2) This public notice may run concurrently with the public notice and comment period in 333 CMR 11.06(3), provided that the notice is distributed at least 21 days prior to the herbicide application, and that, prior to the herbicide application, the public notice and comment period has closed and the Department has granted YOP approval without modifications. When the Department's final approval requires modifications or application dates are selected after YOP approval, separate notice under 333 CMR 11.07(a) is required.

(3) At least 48 hours prior to the application referred to in 11.07(a), the applicant must publish a conspicuous notice in at least one newspaper of general circulation in the city or town where the right-of-way lies. The notice must appear in the local section of the newspaper and measure at least four by five

inches in size. The notice shall contain the following information: the method and locations of pesticide application; the approximate dates on which the pesticide application shall commence and conclude, provided that the applications shall not commence more than ten days before nor conclude ten days after said approximate dates; a list of potential pesticides to be used; a description of the purpose of the application; and the name, title, business address and phone number of a designated contact person representing the applicant from whom any citizen may request further information. The notice should apply only to the calendar year in which the notice is published. Upon request the notice must be made available to the Department.

11.08: Notice of Modification and Revocation

(1) The Department may suspend approval of any VMP or YOP, by written notice to the applicant and applicator, halting the application of herbicide to that right-of-way of the above mentioned YOP. After 21 days if the applicant does not request a hearing, the Department may revoke or modify the VMP and YOP, if it finds:
   (a) that the terms, conditions of restrictions thereof, are being violated or are inadequate to avoid unreasonable adverse effects on the environment or on human health; or
   (b) that the applicant has made a false or misleading statement or has not provided information requested by the Department or Rights-of-Way Advisory Panel; or
   (c) that the applicant has violated any provision of the Massachusetts Pesticide Control Act or FIFRA, or any regulations, standards, orders or license issued under either.

(2) Upon notice of revocation or modification, the applicant may modify the YOP by written request to the Department. Applications to modify the YOP shall be submitted in the manner set forth in 333 CMR 11.06 and disposed of in the manner set forth in 333 CMR 11.06. The Department may waive all or part of the requirement if it determines that the proposed changes do not significantly change the terms of the approved YOP.

11.09: Rights of Appeal

Any person aggrieved by the decision of the Department to approve, deny, modify or revoke a VMP or YOP may request an adjudicatory hearing. The request for a hearing must be received by the Department within 21 calendar days after receipt of the decision. The request should state clearly and concisely the facts of the proceeding, the reasons the decision is alleged to be inconsistent with 333 CMR 11.00 and the relief sought by the adjudicatory hearing. The adjudicatory hearing before the Pesticide Board shall be conducted in accordance with the informal rules of adjudicatory proceeding as set forth in the regulations promulgated pursuant to M.G.L. c. 30A.

11.10: Penalties

Any person who violates any provision of 333 CMR 11.00 shall be subject to the criminal and civil penalties set forth in M.G.L. c. 132 B, § 14.

11.11: Rights-of-Way Advisory Panel

(1) A Rights-of-Way Advisory Panel shall be established to advise the Department on issues relating to 333 CMR 11.00 and to fulfill specific functions as detailed within 333 CMR 11.00.

(2) The Department shall request that the following members participate on the Rights-of-Way Advisory Panel: the Commissioners/Secretaries or his/her designee of the Department of Environmental Protection, the Department of Public Health, and the Executive Office of Transportation and Construction; and a representative of each of the following, all to be appointed by the Department Commissioner: the Massachusetts Association of Conservation Commissions, the Massachusetts Association of Health Boards, the Massachusetts Department of Conservation and Recreation, and an Environmental Advocacy Organization Representative, a member of the University of Massachusetts Extension who is well versed in weed science and Integrated Pest Management of weeds, a representative of the Massachusetts Railroad Association, a representative of a utility company, and a commercial pesticide applicator.

(3) Non-agency representatives shall remain on the panel for a term of five years. Any member absent from two or more consecutive meetings may be removed from the Advisory Panel at the discretion of the Commissioner of the Department, and a replacement requested from the representative agency, industry group, or association.

(4) The Advisory Panel shall meet at least once each year, and shall hold further meetings upon the request of the Department of Agricultural Resources or at the request of any two members of the Advisory Panel.

(5) All Advisory Panel members shall serve without compensation.

APPENDIX 2

RIGHTS-OF-WAY PROPOSED FOR TREATMENT IN 2021

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

ROW #	Municipalities						
1201	Belchertown	Brimfield	Brookfield	Charlton	Palmer	Sturbridge	Warren
1203	Auburn	Charlton	Millbury	Oxford	Sutton		
1207	Attleboro	Mansfield	North Attlebor	Norton	Plainville	Wrentham	
1251	Boylston	Grafton	Millbury	Shrewsbury	Sterling	West Boylston	
1273	Boxford	Haverhill					
1275	Boxford	Georgetown	Groveland				
1431	Milford						
1455	Ashburnham	Fitchburg	Westminster	Winchendon			
1457	Fitchburg	Leominster					
1491	Boxford	Danvers	Middleton	North Andover	North Reading	Peabody	Salem
1493	Southborough						
1515	Lowell	Tewksbury					
1531	Millbury	Sutton					
1533	Brimfield	Monson	Palmer				
1535	Palmer						
1588	Beverly	Salem					
1681	Clinton	Lancaster	Sterling	West Boylston			
1683	Clinton	Lancaster	Sterling				
2032	Rehoboth	Seekonk	Swansea				
2034	Attleboro	Seekonk					
2036	Attleboro	North Attleboro					
4025	Hingham	Hull					
4040	Stoughton						
4042	Avon	Brockton					
4044	Brockton						
4058	Abington	Rockland					
4060	Abington	Rockland					
4064	Hanover	Rockland					
4070	Hanover	Pembroke					
4072	Pembroke						
4074	Pembroke						
4076	Norwell						
4078	Cohasset	Hingham	Norwell	Scituate			
4250	Attleboro	North Attlebor	Plainville				
4330	Wrentham						
4340	Foxborough	Mansfield					
4445	Milford						
5130	Georgetown	Groveland	Newbury	Newburyport			
5195	Andover	Lawrence					
5245	Lowell						
5270	Chelmsford	Dracut	Lowell				
5320	Chelmsford	Tyngsboro					
6030	Gloucester	Rockport					
7320	Groton	Pepperell					
7420	Ayer	Groton	Shirley				
7510	Millbury						
7540	Holden	Rutland					
8310	North Adams						

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

APPENDIX 3

RIGHTS-OF-WAY TREATED IN 2020

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

ROW #	Municipalities						
1205	Somerset	Swansea	Rehoboth	Dighton			
1272	Methuen	Haverhill					
1335	Rowe						
1443	Methuen						
1479	Salem	Peabody	Lynn	Lynnfield	Wakefield		
1581	Somerset	Swansea	Seekonk				
1585	Seekonk	Attleboro					
1605	Warwick	Royalston	Winchendon				
1607	Winchendon	Gardner	Westminster	Fitchburg	Leominster		
1609	Royalston	Athol					
1611	Winchendon	Templeton					
1613	Gardner						
1615	Westminster						
1633	Spencer	Leicester	Auburn	Millbury			
1645	Ware	West Brookfield	Palmer				
1647	Palmer	Monson	Wilbraham	Hampden	East Longmeadow		
1648	East Longmeadow						
2000	Bridgewater	West Bridgewater	Easton	Mansfield	Foxborough	Sharon	Walpole
2002	Bridgewater						
4003	Sterling	Leominster					
4011	Bridgewater	West Bridgewater	Brockton	Whitman			
4018	Berkley	Taunton	Raynham	Bridgewater			
4048	East Bridgewater	Brockton					
4050	East Bridgewater						
4052	East Bridgewater	Bridgewater					
4054	East Bridgewater	Hanson					
4062	Whitman	East Bridgewater					
4125	Marlborough						
5120	Lawrence	North Andover					
5200	Haverhill	North Andover					
5280	Westford						
5282	Westford						
5290	Westford	Chelmsford					
5310	Billerica						
6010	Saugus	Lynnfield					
7210	Sturbridge	Southbridge					
7211	Sturbridge						
7212	Southbridge						
7215	Webster						
7217	Webster						
7440	Leominster						
7460	Leominster						
7470	Leominster						
7480	Leominster						
7810	Royalston	Templeton					
8030	Palmer	Monson					
8031	Palmer	Monson					
8040	Ware	West Brookfield					
8390	Florida						
8410	Stockbridge	Great Barrington	Lee				
8420	Great Barrington	Sheffield					
8440	Lenox						

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

APPENDIX 4

LIST OF MUNICIPALITIES FOR NOTIFICATION IN 2021

(INCLUDES 2021 MUNICIPALITIES AND

2020 POTENTIAL “TOUCH UP” MUNICIPALITIES)

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

2021 Municipalities						
Abington	Brimfield	Georgetown	Lawrence	North Andover	Rehoboth	Stoughton
Andover	Brockton	Gloucester	Leominster	North Attleboro	Rockland	Sturbridge
Ashburnham	Brookfield	Grafton	Lowell	North Reading	Rockport	Sutton
Attleboro	Charlton	Groton	Mansfield	Norton	Rutland	Swansea
Auburn	Chelmsford	Groveland	Middleton	Norwell	Salem	Tewksbury
Avon	Clinton	Hanover	Milford	Oxford	Scituate	Tyngsboro
Ayer	Cohasset	Haverhill	Millbury	Palmer	Seekonk	Warren
Belchertown	Danvers	Hingham	Monson	Peabody	Shirley	West Boylston
Beverly	Dracut	Holden	Newbury	Pembroke	Shrewsbury	Westminster
Boxford	Fitchburg	Hull	Newburyport	Pepperell	Southborough	Winchendon
Boylston	Foxborough	Lancaster	North Adams	Plainville	Sterling	Wrentham

2020 "Touch Up" Municipalities					
Athol	Easton	Leicester	Palmer	Somerset	Ware
Attleboro	Fitchburg	Lenox	Peabody	Southbridge	Warwick
Auburn	Florida	Leominster	Raynham	Spencer	Webster
Berkley	Foxborough	Lynn	Rehoboth	Sterling	West Bridgewater
Billerica	Gardner	Lynnfield	Rowe	Stockbridge	West Brookfield
Bridgewater	Great Barringto	Mansfield	Royalston	Sturbridge	Westford
Brockton	Hampden	Marlborough	Salem	Swansea	Westminster
Chelmsford	Hanson	Methuen	Saugus	Taunton	Whitman
Dighton	Haverhill	Millbury	Seekonk	Templeton	Wilbraham
East Bridgewater	Lawrence	Monson	Sharon	Wakefield	Winchendon
East Longmeadow	Lee	North Andover	Sheffield	Walpole	

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

APPENDIX 5

LIST OF IDENTIFIED PRIVATE WELLS FOR 2021 MUNICIPALITIES

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

CITY/TOWN	PWS NAME	MAILING NAME	MAIL ADDR LINE 1	MAIL TOWN	MAIL STATE	MAIL ZIP
ATTLEBORO	ATTLEBORO WATER DEPT	ATTLEBORO WATER DEPT	1296 WEST ST	ATTLEBORO	MA	02703
AUBURN	AUBURN WATER DISTRICT	AUBURN WATER DISTRICT	P.O. BOX 187	AUBURN	MA	01501
AUBURN	ELM HILL WATER DISTRICT	ELM HILL WATER DISTRICT	55 JEROME AVE	AUBURN	MA	01501
AUBURN	WOODLAND WATER DISTRICT	AUBURN WATER DISTRICT	P.O. BOX 187	AUBURN	MA	01501
AYER	AYER DPW WATER DIVISION	AYER DPW WATER DIVISION	25 BROOK STREET	AYER	MA	01432
BELCHERTOWN	BELCHERTOWN WATER DISTRICT	BELCHERTOWN WATER DISTRICT	PO BOX 801	BELCHERTOWN	MA	01007
BEVERLY	BEVERLY WATER DEPT	BEVERLY WATER DEPT	148 PARK ST	BEVERLY	MA	01915
BEVERLY	SALEM BEVERLY WATER SUPPLY BOARD	SALEM BEVERLY WATER SUPPLY BOARD	50 ARLINGTON AVE	BEVERLY	MA	01915
CHELMSFORD	CHELMSFORD WATER DISTRICT	CHELMSFORD WATER DISTRICT	20 WATERSHED LN	CHELMSFORD	MA	01824
CHELMSFORD	EAST CHELMSFORD WATER DISTRICT	EAST CHELMSFORD WATER DISTRICT	75 CANAL ST	CHELMSFORD	MA	01824
NORTH CHELMSFORD	NORTH CHELMSFORD WATER DIST	NORTH CHELMSFORD WATER DIST	P.O. BOX 655	NORTH CHELMSFORD	MA	01863
CLINTON	CLINTON WATER DEPT	CLINTON WATER DEPT	242 CHURCH ST	CLINTON	MA	01510
GRAFTON	GRAFTON WATER DISTRICT	GRAFTON WATER DISTRICT	P.O. BOX 537 44 Millbury St	GRAFTON	MA	01519
SOUTH GRAFTON	SOUTH GRAFTON WATER DISTRICT	SOUTH GRAFTON WATER DISTRICT	370 PROVIDENCE ROAD	SOUTH GRAFTON	MA	01560
GROTON	GROTON WATER DEPARTMENT	GROTON WATER DEPARTMENT	173 MAIN STREET, TOWN HALL	GROTON	MA	01450
WEST GROTON	WEST GROTON WATER SUPPLY DISTRICT	WEST GROTON WATER SUPPLY DISTRICT	P.O. BOX 246	WEST GROTON	MA	01472
HAVERHILL	HAVERHILL WATER DEPT	HAVERHILL WATER DEPT	131 AMESBURY ROAD	HAVERHILL	MA	01830
HINGHAM	HINGHAM/HULL AQUARION WATER COMPANY OF	HINGHAM/HULL AQUARION WATER COMPANY OF	900 MAIN STREET	HINGHAM	MA	02043
LANCASTER	LANCASTER WATER DEPARTMENT	LANCASTER WATER DEPARTMENT	392 MILL ST EXTN	LANCASTER	MA	01523
LEOMINSTER	LEOMINSTER WATER DIVISION	LEOMINSTER WATER DIVISION	109 GRAHAM ST	LEOMINSTER	MA	01453
LOWELL	LOWELL REGIONAL WATER UTILITY	LOWELL REGIONAL WATER UTILITY	815 PAWTUCKET BLVD	LOWELL	MA	01854
MANSFIELD	MANSFIELD WATER DIVISION	TOWN OF MANSFIELD, WATER DIVISION	SIX PARK ROW	MANSFIELD	MA	02048
MILLBURY	AQUARION WATER COMPANY MILLBURY	AQUARION WATER COMPANY: MILLBURY	24 PROVIDENCE ST	MILLBURY	MA	01527
NORTH ADAMS	NORTH ADAMS WATER DEPT	NORTH ADAMS WATER DEPT	10 MAIN ST CITY HALL	NORTH ADAMS	MA	01247
NORTH ATTLEBOROUGH	NORTH ATTLEBORO WATER DEPT	NORTH ATTLEBORO WATER DEPT	49 WHITING ST	NORTH ATTLEBOROUGH	MA	02760
NORTON	NORTON WATER DEPARTMENT	NORTON WATER DEPARTMENT	P.O. BOX 1168	NORTON	MA	02766
EAST PEPPERELL	PEPPERELL DPW WATER DIVISION	PEPPERELL WATER DEPARTMENT	P.O. BOX 175	EAST PEPPERELL	MA	01463
PLAINVILLE	PLAINVILLE WATER DEPARTMENT	PLAINVILLE WATER DEPARTMENT	P.O. BOX 1565	PLAINVILLE	MA	02762
RUTLAND	RUTLAND WATER DEPARTMENT	RUTLAND WATER DEPARTMENT	17 POMMOGUSSETT RD	RUTLAND	MA	01543
SEEKONK	SEEKONK WATER DISTRICT	SEEKONK WATER DISTRICT	P.O. BOX 97 50 Water Lane	SEEKONK	MA	02771
SHIRLEY	SHIRLEY WATER DISTRICT	SHIRLEY WATER DISTRICT	124 AYER RD	SHIRLEY	MA	01464
SHREWSBURY	SHREWSBURY WATER DEPARTMENT	SHREWSBURY WATER DEPARTMENT	100 MAPLE AVE	SHREWSBURY	MA	01545
SOUTHBOROUGH	SOUTHBOROUGH DPW WATER DIVISION (MWRA)	SOUTHBOROUGH DPW WATER DIVISION	147 CORDAVILLE RD	SOUTHBOROUGH	MA	01772
STERLING	STERLING WATER DEPARTMENT	STERLING WATER DEPT	171 WORCESTER ROAD	STERLING	MA	01564
SUTTON	WILKINSONVILLE WATER DISTRICT	WILKINSONVILLE WATER DISTRICT	P.O. BOX 173 13A Providence Rd	SUTTON	MA	01590
SWANSEA	SWANSEA WATER DISTRICT	SWANSEA WATER DISTRICT	700 WILBUR AVE	SWANSEA	MA	02777
TEWKSBURY	TEWKSBURY WATER DEPT	TEWKSBURY WATER DEPT	71 MERRIMACK DR	TEWKSBURY	MA	01876
WEST BOYLSTON	WEST BOYLSTON WATER DISTRICT	WEST BOYLSTON WATER DISTRICT	183 WORCESTER ST	WEST BOYLSTON	MA	01583
WESTMINSTER	WESTMINSTER DEPARTMENT OF PUBLIC WORKS	WESTMINSTER DEPARTMENT OF PUBLIC WORKS	P.O. BOX 376	WESTMINSTER	MA	01473
WINCHENDON	WINCHENDON WATER DEPARTMENT	WINCHENDON WATER DEPARTMENT	109 FRONT ST	WINCHENDON	MA	01475
WRENTHAM	WRENTHAM WATER DIVISION	WRENTHAM WATER DIVISION	P.O. BOX 658	WRENTHAM	MA	02093

Note: Rights-of-way proposed for treatment may change due to workplan constraints.

APPENDIX 6

SENSITIVE AREAS: TABLE AND ILLUSTRATIONS OF LIMITED SPRAY AND NO SPRAY AREAS

CONTROL STRATEGIES FOR SENSITIVE AREAS[#]

Sensitive Area	No-Spray and Limited Spray Areas (feet)	Control Method	Restriction Code
Public Ground Water Supplies	400'	Mechanical Only	None
Primary Recharge Area	Designated buffer zone or 1/2 mile radius	Mechanical, Recommended Herbicides*	24 months
Public Surface Water Supplies (Class A & Class B)	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, within 400' upstream of water source	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, greater than 400' upstream of water source	10'	Mechanical Only	None
	10'-200'	Recommended Herbicides	24 months
Class B Drinking Water Intake, within 400' upstream of intake	100'	Mechanical Only	None
	100'-200'	Recommended Herbicides	24 months
Private Drinking Water Supplies	50'	Mechanical Only	None
	50'-100'	Recommended Herbicides	24 months
Surface Waters	10'	Mechanical Only	None
	10'-100'	Recommended Herbicides	12 months
Rivers	10' from mean annual high water line	Mechanical Only	None
	10'-200'	Recommended Herbicides	12 months
Wetlands	100' (treatment in wetlands permitted up to 10' of standing water)*[+]	Low-pressure Foliar, CST, Basal Recommended Herbicides	24 months
Inhabited Areas	100' (for high-pressure foliar only)	Recommended Herbicides	12 months
Agricultural Area (Crops, Fruits, Pastures)	100' (for high-pressure foliar only)	Recommended Herbicides	12 months
Certified Vernal Pools	10'	Mechanical Only when water is present	None
Certified Vernal Pool Habitat	10'-outer boundary of habitat	No treatment without written approval per 321 CMR 10.14(12)	
Priority Habitat	No treatment without written approval per 321 CMR 10.14(12)		

Restrictions "24 Months": A minimum of twenty-four months shall elapse between applications
"12 Months": A minimum of twelve months shall elapse between applications

*Massachusetts recommended herbicides for sensitive sites

[+]Per "Decision Concerning the Wetlands Impact Study"

[#]Table Compiled by Jeffrey M. Taylor, Vegetation Control Service, Inc.

Vegetation Control Strategies in Sensitive Areas

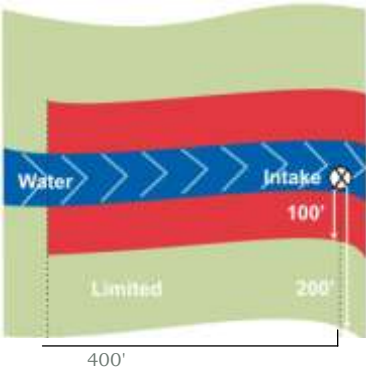
Required by 333 CMR 11.00 and/or approved Vegetation Management Program and Yearly Operational Plan.

<u>Sensitive areas not readily identified in the field:</u>

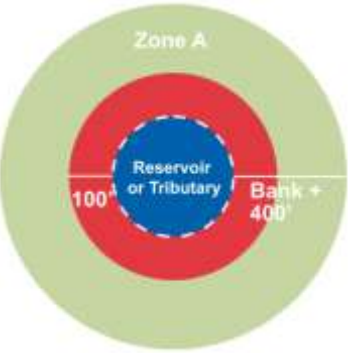
- Mapped on electronic USGS Topographic Maps.
- Contractor will be provided electronic and hard copy of maps with which to flag the boundaries of no-herbicide zones within the right-of-way (ROW) prior to herbicide application.

Public Ground Water Supply Well Zone I

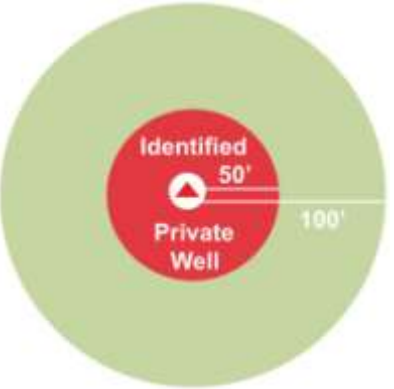
Drinking Water Intake Class B



Public Surface Water Source Class A



Identified Private Drinking Water Well



Sensitive areas readily identifiable in the field:

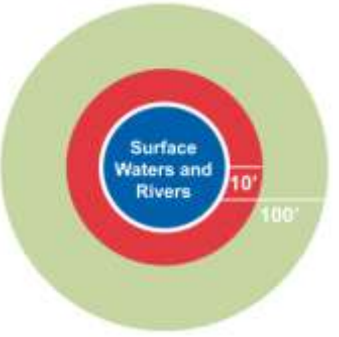
- Consult USGS Topographic Maps
- Contractor will be provided electronic and hard copy of maps with which to flag the boundaries of no-herbicide zones within the right-of-way (ROW) prior to herbicide application.
- Contractor will mark additional areas not found on maps

Wetlands

Defined by Chapter 131, Section 40

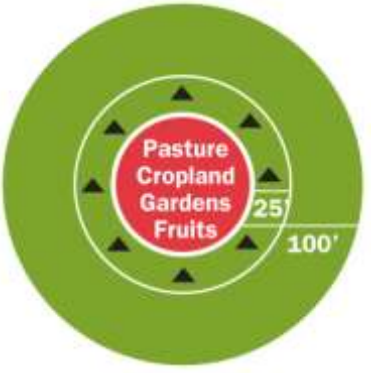
Surface Waters and Rivers

All surface water and water over wetlands. Mean high water for rivers.

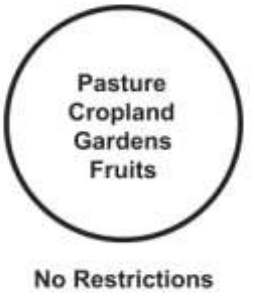


Agricultural Areas

Active - Growing Season



Inactive Agricultural

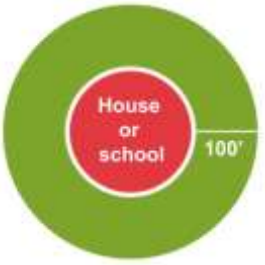


Sensitive areas readily identifiable in the field: *continued*

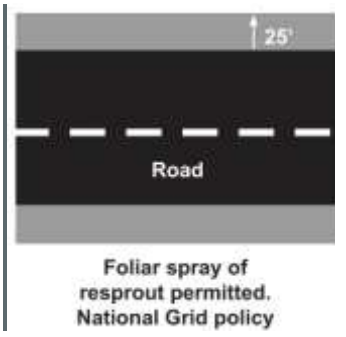
- Consult USGS Topographic Maps
- Contractor will be provided electronic and hard copy of maps with which to flag the boundaries of no-herbicide zones within the right-of-way (ROW) prior to herbicide application.
- Contractor will mark additional areas not found on maps

Inhabited Areas

Where people live, work, or gather



Road Crossings



KEY

= No Herbicide Use

= Water

= Public Ground Water Supply Well or Private Well

= Limited Herbicide Use

1.) Herbicide recommended for use in sensitive area: per (333 CMR 11.04(1)(d)).

2.) Cut stump, basal and low pressure foliar.

3.) 24 months elapsed since previous treatment.

12 months elapsed since previous treatment.

4.) No herbicides applied to conifer species and carriers reviewed by DAR and DEP.

5.) Cut stump only.

6.) Cut stump and basal treatments. (Foliar application to resprouts is permitted.) No other conditions.

APPENDIX 7

LIST OF COMPATIBLE SPECIES AND INCOMPATIBLE SPECIES

EXHIBIT A:

Capable Tall Growing Species

The following is a list of tall growing tree species that are considered undesirable in most right-of-way situations and should be removed from the right-of-way floor wherever practicable, to the extent permitted by landowner constraints and easement conditions. The primary objective of the Transmission Right-of-Way Management Program is to effectively remove and control the re-growth and reinvasion of these species.

In sites, due to terrain, conductor height, or other right-of-way variable, where a normally undesirable tall growing species will never reach the ATVM clearance distances, such tree may be retained on the right-of-way during routine maintenance as long as there is no undesirable affect or risk to access, construction, reliability or public safety. Such locations will be determined through a combination of field measurements, profile mapping or other technology and will also be routinely reviewed and verified during each inventory cycle.

Ash	ASH	Cucumber Tree	CUC
Mountain	MAS	Elm	ELM
Balsam Fir	BAF	Hemlock	HEM
Basswood	BAS	Hickory	HIC
Beech	BEE	Hophornbeam	HOP
Birch	BIR	Maple	MAP
Cherry		Oak	OAK
Black	BCH	Pine	PIN
Choke	CCH	Poplar/Aspen	POP
Domestic	DCH	Red Mulberry	MUL
Pin (Fire)	PCH	Sassafras	SAS
Black Gum/Tupelo	BGU	Spruce	SPR
Black Locust	BLO	Tamarack/Larch	TAM
Black Walnut	BWA	Tree-of-Heaven	THE
Butternut	BUT	Tulip/Yellow Poplar	TUL
Catalpa	CAT	Willow	WIL
Cedar	CED	Other	OTH
Chestnut	CHE		

EXHIBIT B:

Small to Medium Trees

The following is a list of small to medium trees that may be compatible along the edges of the right-of-way, except on narrower sub-transmission rights-of-way. They should be removed within the wire zone except where the mature height would not invade the National Grid Minimum Clearance Distance (Clearance 2) or local conditions do not warrant removal. Any plant on the right-of-way that invades the National Grid Minimum Clearance Distance (Clearance 2) may be removed. These smaller tree species may be preferred for retention in buffer areas and other sensitive sites rather than taller growing tree species.

Species	**Code**
Apple	APP
Autumn Olive	AUT
Buckthorn	BUC
Common Buckthorn	“
European Buckthorn	“
Dogwood	
Alternate Leaf	ADG
Flowering	FDG
Cedars	CED
American Hornbeam	
“Ironwood”	HOR
Hawthorne	HAW
Mountain Maple	MOM
Pear	PER
Russian Olive	RUS
Shadbush/Serviceberry	SHD
Shrub Willow	WIL
Speckled Alder	ALD
Staghorn Sumac	SUM
Witch Hazel	WIH

EXHIBIT C:

Woody Shrubs

The following is a list of shrub species commonly found on rights-of-way across the service territory. While they are nearly always compatible in the border zone, several may grow tall enough to enter National Grid Minimum Clearance Distance (Clearance 2).

Species	**Code**	**Species**	**Code**
American Barberry	BAR	Privet	PRI
Chokeberry		Gooseberry	RIB
Black Chokeberry	BCB	Rose	
Red Chokeberry	RCB	Domestic	DOR
Blueberry		Multiflora	MUR
Low	BLU	Rubus	RUB
Highbush	HBL	Blackberry	"
Button Bush	BTN	Raspberry	"
Dewberry	DEW	Silverberry	
Dogwood	DOG	American	SIL
Red Osier	"	Sumac	SUM
Stiff (similar to Red Osier)	"	Smooth	"
Grey	"	Winged	"
Silky	"	Common Spicebush	SPB
Roundleaf	"	Spirea	SPI
Elderberry	ELD	Sweetfern	"
Hazelnut	HAZ	Steeple Bush	"
American Hazelnut	"	Sweetfern	SWF
Beaked Hazelnut	"	Viburnum	VIB
Honeysuckle	HON	Arrowwood	ARR
Huckleberry	HUC	Highbush Cranberry	HCR
Juniper	GRJ	Mapleleaf	MVB
Dwarf	"	Nannyberry	NAN
Ground/Trailing	"	Northern Wild Raisin	RAI
Mountain Holly	MOH	Hobblebush	HOB
Mountain Laurel	MOL	Winterberry Holly	WIN
New Jersey Tea	NJT	American Yew	AMY
Northern Prickly Ash	NPA		
Shrub Oak	SOK	Climbing Vines	
		Bittersweet	CLB
		Grape	GRA

Note that some of these species can be classified as either exotic or invasive. In addition, some of these species are noxious plants – particularly Multiflora Rose and Poison Sumac. In most situations management objectives within and adjacent to the right-of-way may warrant the removal or reduction of these species. Future discussions with State and Federal agencies to address invasive and exotic species on a landscape scale may require modifications of the current treatment course of action for some species.

Specimen Label

Dow AgroSciences

Vastlan™

SPECIALTY HERBICIDE

®™ Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

TRICLOPYR CHOLINE	GROUP	4	HERBICIDE

For the control of woody plant species and annual and perennial broadleaf weeds on

- **range and permanent grass pastures, grasses grown for hay, Conservation Reserve Program (CRP) sites;**
- **forest sites, conifer and tree plantations, and Christmas tree plantations;**
- **non-crop areas for example, airports, barrow ditches, communication transmission lines or structures, manufacturing and storage sites, electrical power and utility rights-of-way, fencerows, gravel pits, industrial sites, military lands, mining and drilling areas, non-irrigation ditch banks, oil and gas pads, parking lots, petroleum tank farms, pipelines, railroads, roadsides, storage areas, storm water retention areas, substations, unimproved rough turf grasses, vacant lots and other non-crop residential areas, and around farm buildings;**
- **natural areas (open space) for example, campgrounds, parks, prairie management, trails and trailheads, recreation areas, wildlife openings and wildlife habitat and management areas;**
- **including grazed areas on these sites; and**
- **aquatic sites**

For use in New York State, comply with Section 24(c) Special Local Need labeling for Vastlan, SLN NY-160004.

Active Ingredient:
Triclopyr choline: 2-[(3,5,6-trichloro-2-pyridinyl)oxy] acetic acid, choline salt 54.72%
Other Ingredients 45.28%
Total 100.0%

Acid equivalent: triclopyr – 39.02% - 4 lb/gal

Precautionary Statements

Hazard to Humans and Domestic Animals

EPA Reg. No. 62719-687

WARNING

May be fatal if swallowed • Causes substantial but temporary eye injury • Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Do not get in eyes, on skin, or on clothing. Wash thoroughly after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

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

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

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

User Safety Recommendations

Users should:

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean 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 swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Under certain conditions, treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may contribute to fish suffocation. This loss can cause fish suffocation. Therefore, to minimize this hazard, do not treat more than one-third to one-half of the water area in a single operation and wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State agency for fish and game before applying to public water to determine if a permit is needed.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Read all Directions for Use carefully before applying.

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.

Agricultural Use Requirements (Cont.)

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:

- Protective eyewear
- Coveralls
- Shoes plus socks
- Waterproof gloves

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.

Entry Restrictions for Non-WPS Uses: For applications to non-cropland areas, do not allow entry into areas until sprays have dried, unless applicator and other handler PPE is worn.

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal. Open dumping is prohibited.
Pesticide Storage: Store above 32°F or agitate before use.
Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Nonrefillable containers 5 gallons or less:
Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

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.

Refillable containers 5 gallons or larger:
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. 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. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers 5 gallons or larger:
Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

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. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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.

Product Information for All Use Sites

Use Vastlan™ for the control of woody plants and broadleaf weeds in range and pasture, grasses grown for hay, Conservation Reserve Program (CRP) sites; forest sites, conifer and tree plantations, and Christmas tree plantations; non-crop areas for example, airports, barrow ditches, communication transmission lines or structures, manufacturing and storage sites, electrical power and utility rights-of-way, fencerows, gravel pits, industrial sites, military lands, mining and drilling areas, non-irrigation ditch banks, oil and gas pads, parking lots, petroleum tank farms, pipelines, railroads, roadsides, , storage areas, storm water retention areas, substations, unimproved rough turf grasses, vacant lots and other non-crop residential areas, and around farm buildings; natural areas (open space) for example, campgrounds, parks, prairie management, trails and trailheads, recreation areas,wildlife openings and wildlife habitat and management areas and aquatic sites.

Obtain Required Permits: Consult with appropriate state or local water authorities before applying this product to public waters. State or local public agencies may require permits.

Use Precautions

When making applications to control unwanted plants on banks or shorelines of moving water sites, minimize overspray to open water.

It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands (such as flood plains, deltas, marshes, swamps, or bogs), and transitional areas between upland and lowland sites.

It is the pesticide user's responsibility to ensure that all products in the listed mixtures are registered for the intended use. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Use Restrictions

For use in New York State, comply with Section 24(c) Special Local Need labeling for Vastlan, SLN NY-160004.

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

Do not apply Vastlan directly to, or otherwise permit it to come into direct contact with, grapes, tobacco, vegetable crops, flowers, or other desirable broadleaf plants. Do not permit spray mists containing Vastlan to drift onto such plants.

Do not apply to salt water bays or estuaries.

Do not apply directly to un-impounded rivers or streams.

Do not apply where runoff water may flow onto agricultural land as injury to crops may result.

Do not apply with a mistblower.

Irrigation waters:

Do not apply on ditches or canals currently being used to transport irrigation water or that will be used for irrigation within 4 months following treatment. It is permissible to treat non-irrigation ditch banks and the outer banks of irrigation ditches.

Water treated with Vastlan may not be used for irrigation purposes for 120 days after application or until residue levels of Vastlan are determined by laboratory analysis, or other appropriate means of analysis, to be 1 ppb or less.

Seasonal Irrigation Waters: Vastlan may be applied during the off-season to surface waters that are used for irrigation on a seasonal basis provided that there is a minimum of 120 days between applying Vastlan and the first use of treated water for irrigation purposes, or until residue levels of Vastlan are determined by laboratory analysis, or other appropriate means of analysis, to be 1 ppb or less.

Irrigation Canals/Ditches: Do not apply Vastlan to irrigation canals/ditches unless the 120-day restriction on irrigation water usage can be observed or residue levels of Vastlan are determined by laboratory analysis, or other appropriate means of analysis, to be 1 ppb or less.

Restrictions for Potable Water Intakes for Emerged Aquatic Weed Control – Lakes, Reservoirs, Ponds:
See chart below for specific setback distances near functioning potable water intakes.
Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

	Vastlan Application Rate			
Area Treated	**1.5 qt/acre**	**3 qt/acre**	**4.5 qt/acre**	**6 qt/acre**
(acres)	**Setback Distance (ft)**			
4	0	200	400	500
>4 - 8	0	200	700	900
>8 - 16	0	200	700	1000
>16	0	200	900	1300

To apply Vastlan around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 0.4 parts per million (ppm) or less by laboratory analysis or immunoassay.

Recreational Use of Water in Treatment Area: There are no restrictions on use of water in the treatment area for recreational purposes, including swimming and fishing.

Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Restrictions for Potable Water Intakes for Submerged Weed Control – Lakes, Reservoirs, Ponds:
For applications of Vastlan to control submerged weeds in lakes, reservoirs or ponds that contain a functioning potable water intake for human consumption, see the chart below to determine the minimum setback distances of the application from the functioning potable water intakes.

Area Treated (acres)	**Concentration of Triclopyr Acid in Water (ppm ae)**				
	0.75 ppm	1 ppm	1.5 ppm	2 ppm	2.5 ppm
	Required Setback Distance (ft) from Potable Water Intake				
<4	300	400	600	800	1000
>4 – 8	420	560	840	1120	1400
>8 – 16	600	800	1200	1600	2000
>16 – 32	780	1040	1560	2080	2600
>32 acres, calculate a setback using the formula for the appropriate rate	Setback (ft) = (800*ln (acres) – 160)/3.33	Setback (ft) = (800*ln (acres) – 160)/2.50	Setback (ft) = (800*ln (acres) – 160)/1.67	Setback (ft) = (800*ln (acres) – 160)/1.25	Setback (ft) = (800*ln (acres) – 160)

Example Calculation 1: to apply 2.5 ppm Vastlan to 50 acres:

Setback in feet = (800 x ln (50 acres) - 160
= (800 x 3.912) – 160
= 2970 feet

Example Calculation 2: to apply 0.75 ppm Vastlan to 50 acres:

Setback in feet = (800 x ln (50 acres) - 160
3.33
= (800 x 3.912) – 160
3.33
= 892 feet

Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

To apply Vastlan around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 0.4 parts per million (ppm) or less by laboratory analysis or immunoassay.

Maximum Use Rates

- Apply no more than 6 lb ae of triclopyr (6 quarts of Vastlan) per acre per year on aquatic sites.
- Apply no more than 2 lb ae of triclopyr (2 quarts of Vastlan) per acre per growing season on range and pasture sites, including rights-of-way, fence rows or any area where grazing or harvesting of hay is allowed.
- On forestry sites, Vastlan may be used at rates up to 6 lb ae of triclopyr (6 quarts of Vastlan) per acre per year.
- For all terrestrial use sites other than range, pasture, forestry sites, and grazed/hayed areas, the maximum application rate is 9 lb ae of triclopyr (9 quarts of Vastlan) per acre per year.
- See Maximum Labeled Rate versus Spray Volume per Acre table below for relationship between mixing rate, spray volume and maximum application rate.

Maximum Labeled Rate versus Spray Volume per Acre

Total Spray Volume (gal/acre)	**Maximum Rate of Vastlan**		
	Range and Pasture Sites[1] (gal/100 gal of spray)	**Forestry Sites[2] (gal/100 gal of spray)**	**Non-Cropland Sites[3] (gal/100 gal of spray)**
400	Do not use	0.375	0.57
300	Do not use	0.5	0.75
200	Do not use	0.75	1.125
100	0.5	1.5	2.25
50	1	3	4.5

Maximum Labeled Rate versus Spray Volume per Acre (Cont.)

Total Spray Volume (gal/acre)	**Maximum Rate of Vastlan**		
	Range and Pasture Sites[1] (gal/100 gal of spray)	**Forestry Sites[2] (gal/100 gal of spray)**	**Non-Cropland Sites[3] (gal/100 gal of spray)**
40	1.25	3.75	5.63
30	1.67	5	7.5
20	2.5	7.5	11.25
10	5	15	22.5

[1]Do not exceed the maximum use rate of 2 lb ae of triclopyr (2 quarts of Vastlan)/acre/year.
[2]Do not exceed the maximum use rate of 6 lb ae of triclopyr (6 quarts of Vastlan)/acre/year.
[3]Do not exceed the maximum use rate of 9 lb ae of triclopyr (9 quarts of Vastlan)/acre/year on non-cropland use sites other than rangeland, pasture, forestry, and grazed/hayed areas.

Use the higher dosage rates in the chart when woody plants approach an average of 15 feet in height or when the brush covers more than 60% of the area to be treated. If lower rates are used on hard to control species, resprouting may occur the year following treatment.

Haying Restrictions

Haying (harvesting of dried forage)

- Do not harvest hay for 14 days after application.

Slaughter Restriction: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

Avoiding Injurious Spray Drift

Make applications only when there is little or no hazard from spray drift. Small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants that are near enough to be injured. It is suggested that a continuous smoke column at or near the spray site or a smoke generator on the spray equipment be used to detect air movement, lapse conditions, or temperature inversions (stable air). If the smoke layers or indicates a potential of hazardous spray drift, do not spray.

Spray Drift Management
Avoiding spray drift at the application site is the responsibility of the applicator. 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.

Aerial Application:
The following drift management requirements must be followed to avoid off-target drift movement from aerial applications with aerial applications:

1. The distance of the outer most operating nozzles on the boom must not exceed 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 must be observed.

The applicator should be familiar with and take into account the information covered in the following Aerial Drift Reduction Advisory, below.

Aerial Drift Reduction Advisory
Information on 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).

For aerial application on rights-of-way or other areas near susceptible crops, apply through a Microfoil† or Thru-Valve boom†, or use an agriculturally labeled drift control additive. Other drift reducing systems or thickened sprays prepared by using high viscosity inverting systems may be used if they are made as drift-free as mixtures containing agriculturally labeled thickening agents or applications made with the Microfoil or Thru-Valve boom. Do not use a thickening agent with the Microfoil or Thru-Valve booms, or other systems that cannot accommodate thick sprays. If a spray thickening agent is used, follow all use directions and precautions on the product label.

†Reference within this label to a particular piece of equipment produced by or available from other parties is provided without consideration for use by the reader at its discretion and subject to the reader's independent circumstances, evaluation, and expertise. Such reference by Dow AgroSciences is not intended as an endorsement of such equipment, shall not constitute a warranty (express or implied) of such equipment, and is not intended to imply that other equipment is not available and equally suitable. Any discussion of methods of use of such equipment does not imply that the reader should use the equipment other than is advised in directions available from the equipment's manufacturer. The reader is responsible for exercising its own judgment and expertise, or consulting with sources other than Dow AgroSciences, in selecting and determining how to use its equipment.

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 manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger 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 recommended 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: The distance of the outer most operating nozzles on the boom must not exceed 75% of wingspan or rotor diameter.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest 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 to 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 local, low level 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 the 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 potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Ground Equipment: To aid in reducing spray drift, Vastlan should be used in thickened (high viscosity) spray mixtures using an agriculturally labeled drift control additive, high viscosity invert system, or equivalent as directed by the manufacturer. With ground equipment, spray drift can be reduced by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by keeping the operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when wind velocity is low (follow state regulations). In hand-gun applications, select the minimum spray pressure that will provide adequate plant coverage (without forming a mist). Do not apply with nozzles that produce a fine-droplet spray.

High Volume Leaf-Stem Treatment: To minimize spray drift, do not use pressure exceeding 50 psi at the spray nozzle and keep sprays no higher than brush tops. An agriculturally labeled thickening agent may be used to reduce drift.

Use Information

Use Vastlan at rates of 0.75 to 9 quarts of Vastlan per acre to control broadleaf weeds and woody plants. In all cases, use the amount specified in enough water to give uniform and complete coverage of the plants to be controlled. Refer to Maximum Use Rates paragraph - follow defined rates restrictions based on use sites and whether or not grazing or haying is involved.

Surfactants
For best results, use a surfactant with foliar applications and apply when woody plants and weeds are actively growing. When hard to control species such as ash, blackgum, choke cherry, elm, maples, oaks, pines, or winged elm are prevalent and during applications made in late summer when the plants are mature or during drought conditions, use the higher rates of Vastlan alone or in combination with Milestone, Opensight, Tordon® or other herbicides to broaden the spectrum of activity.

Tank Mixing
Before using any recommended tank mixtures, read the directions and all use precautions and restrictions on all labels in the tank mix. Prior to large scale batch mixing, conduct a "jar test" for spray mixture compatibility by mixing each component in the required order and proportion in a clear glass jar. **Note:** If tank mixing with glyphosate herbicides, mix the Vastlan with at least 75% of the total spray volume desired and ensure that Vastlan is well mixed before adding the glyphosate herbicides to avoid incompatibility. When using Vastlan in combination with Freelexx, 2,4-D amine (like DMA 4 IVM) or low volatile ester herbicides, generally the higher rates should be used for satisfactory brush control.

A surfactant should be added to the spray tank last or as recommended on the product label. If combined with emulsifiable concentrate herbicides, moderate continuous adequate agitation is required.
It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Broadcast Applications With Ground Equipment
Apply using equipment that will ensure uniform coverage of the spray volumes applied. To improve spray coverage, add a non-ionic surfactant. See Maximum Labeled Rate versus Spray Volume per Acre table below for relationship between mixing rate, spray volume and maximum application rate.

Aerial Application
Aerial sprays should be applied using suitable drift control. (See Use Precautions and Restrictions.) Add a non-ionic surfactant. See Maximum Labeled Rate versus Spray Volume per Acre table above for relationship between mixing rate, spray volume and maximum application rate.

Woody Plant Control With Ground Equipment for Noncropland sites

High Volume Foliage Treatment

For control of woody plants, use Vastlan at the rate of 3 to 9 quarts per 100 gallons of spray solution, or Vastlan at 0.75 to 3 quarts may be tank mixed with Freelexx, 2,4-D (like DMA 4 IVM, or low volatile esters), or products such as Milestone, Opensight, Tordon* and diluted to make 100 gallons of spray solution. Apply at a volume of 100 to 400 gallons of total spray per acre depending upon size and density of woody plants. Applications should be sufficient to provide thorough plant coverage. (See Use Precautions and Restrictions.) Do not exceed maximum allowable use rates per acre.

* Tordon is not registered for use in the states of California and Florida. This product is a restricted use pesticide. Check to ensure tank mix partners are state registered before use. See this product label for more information.

Low Volume Foliage Treatment

To control susceptible woody plants, apply up to 9 quarts of Vastlan in 10 to 100 gallons of finished spray. The maximum volume of the finish spray applied to an acre is limited by the maximum use rate per site type (See Maximum Use Rate section - Range and Pasture, Grazing, Haying sites 2 lb ae, Forestry and aquatic sites 6 lb ae, and all other sites 9 lb ae triclopyr). For best results, a surfactant should be added to all spray mixtures. The spray concentration of Vastlan and total spray volume per acre should be adjusted according to the size and density of target woody plants and kind of spray equipment used. With low volume sprays, use sufficient spray volume to obtain uniform coverage of target plants including the surfaces of all foliage, stems, and root collars (see Use Precautions and Restrictions). Match equipment and delivery rate of spray nozzles to height and density of woody plants. When treating tall, dense brush, a truck mounted spray gun with spray tips that deliver up to 2 gallons per minute at 40 to 60 psi may be required. Backpack or other types of specialized spray equipment with spray tips that deliver less than 1 gallon of spray per minute may be appropriate for short, low to moderate density brush.

Tank Mixing: As a low volume foliar spray, up to 9 quarts of Vastlan may be applied in tank mix combination with Tordon* or Graslan L* in 10 to 100 gallons of finished spray. The maximum volume of the finish spray applied to an acre is limited by the maximum use rate per site type (See Maximum Use Rate section - Range and Pasture, Grazing, Haying sites 2 lb ae, Forestry and aquatic sites 6 lb ae, and all other sites 9 lb ae triclopyr).

* Tordon and Graslan L are not registered for use in the states of California and Florida. These products are restricted use pesticides. See product labels for more information.

Foliage Treatment (Non-Grazed/Non-Hayed Areas)

Use 6 to 9 quarts of Vastlan alone or in a tank mix combination with other herbicides such as Freelexx, 2,4-D (like DMA 4 IVM, or low volatile esters) or Milestone, Opensight, Tordon*, or Graslan L* and apply in a total spray volume of 10 to 30 gallons per acre. Use the higher rates and volumes when plants are dense or under drought conditions.

Interspersed areas in non-grazed/hayed rights-of-ways that may be subject to grazing or haying may be spot treated with this rate if the treated area comprises no more than 10% of the total grazed/hayed area.

* Tordon and Graslan L are not registered for use in the states of California and Florida. These products are restricted use pesticides. See product labels for more information.

Foliage Treatment (Range and Pasture and Grazed/Hayed Areas)

Use 1 to 2 quarts of Vastlan per acre. Apply as a broadcast spray in a total volume of 10 gallons or more per acre. Apply anytime the weeds are actively growing. Tank mixtures can be made with other herbicides registered for use on grazed/hayed sites such as Milestone, Opensight, PastureGard HL, Surmount, Freelexx, or Tordon* or Graslan L*.

* Tordon and Graslan L are not registered for use in the states of California and Florida. These producst are restricted use pesticides. Check to ensure tank mix partners are state registered before use. See product labels for more information.

Weed Resistance Management:

Triclopyr, the active ingredient in this product, is a Group 4 herbicide based on the mode of action classification system of the Weed Science Society of America. Any weed population may contain or develop plants resistant to Group 4 herbicides. Resistant weeds may dominate the weed population if these herbicides are used repeatedly in the same field. Such resistant weed plants may not be effectively managed using Group 4 herbicides but may be effectively managed utilizing other herbicides alone or in mixtures from different herbicide Groups that are labeled for control of these weeds and/or by using cultural or mechanical practices. Consult your local company representative, state cooperative extension service, professional consultants or other qualified authorities to determine appropriate actions for treating specific resistant weeds.

Best Management Practices:

Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is recommended. A diversified weed management program may include the use of multiple herbicides with different modes of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate and directions for use is important to delay the selection for resistant weeds. Scouting after a herbicide application is important because it can facilitate the early identification of weed shifts and/or weed resistance and thus provide direction on future weed management practices. One of the best ways to contain resistant weed populations is to implement measures to avoid allowing weeds to reproduce by seed or to proliferate vegetatively. Cleaning equipment between sites and avoiding movement of plant material between sites will greatly aid in reducing the spread of resistant weed seed.

Woody Plants and Weeds Controlled

alder
arrowwood
ash
aspen
Australian pine
bear clover (bearmat)
beech
birch
blackberry
blackgum
Brazilian pepper
broom, Scotch, French, Spanish, Portugese
cascara
ceanothus
cherry
chinquapin
choke cherry
cottonwood
crataegus (hawthorn)
Douglas fir
dogwood
elderberry
elm
gallberry
gorse
hazel
hornbean
kudzu[1]
locust
madrone
maples
melaleuca (seedlings)
mulberry
oaks
persimmon
pine
poison ivy
poison oak
poplar
Russian olive 1/
salt-bush (*Baccharis* spp.)
salt cedar[2]
salmonberry
sassafras
scotch broom
sumac
sweetbay magnolia
sweetgum
sycamore
tanoak
thimbleberry
tulip poplar
waxmyrtle
western hemlock
wild rose
willow
winged elm

[1]For complete control, re-treatment may be necessary.
[2]Use cut surface treatments for best results.

Annual and Perennial Broadleaf Weeds

bindweed
burdock
Canada thistle
chicory
clover
curly dock
dandelion
field bindweed
ground ivy
lambsquarter
lespedeza
Mexican petunia
plantain
purple loosestrife 2/
oxalis
ragweed
smartweed
Spanish needles/ common beggarthicks
tansy ragwort
thistle
tropical soda apple
vetch
wedelia
wild lettuce

Aquatic Weeds

alligatorweed
American lotus
American frogbit
aquatic sodaapple
Eurasian watermilfoil
milfoil species
nuphar (spatterdock)
parrotfeather*
phragmites 3/
pickerelweed
pennywort
purple loosestrife
waterhyacinth
waterlily
waterprimose
watershield

*Re-treatment may be needed to achieve desired level of control.

1/ Russian olive

Apply Vastlan at 3 quarts per acre plus Milestone® and a non-ionic surfactant at 0.25 to 0.5% v/v or 1 quart/acre of crop oil concentrate or methylated seed oil. Treatments can be made to small (usually less than 6 feet in height) trees or to regrowth of trees after cutting, mowing, or shredding operations. For foliar applications, apply until foliage is wet, but not to runoff. When treating regrowth of mowed trees, allow time for the plants to re-grow and develop adequate leaf area for a foliar application. This may mean the application will need to be done the year after cutting or, at least, in September or October after mowing the previous winter or early spring.

These treatments may need to be re-applied in subsequent years to achieve the desired level of long term control if trees resprout after the initial treatment

2/ Purple Loosestrife
Purple loosestrife can be controlled with foliar applications of Vastlan. For broadcast applications, use a minimum of 4.5 to 6 quarts of Vastlan per acre. Apply Vastlan when purple loosestrife is at the bud to mid-flowering stage of growth. Follow-up applications for control of regrowth should be made the following year in order to achieve increased control of this weed species. For all applications, a non-ionic surfactant should be added to the spray mixture. Follow all directions and use precautions on the label of the surfactant. Thorough wetting of the foliage and stems is necessary to achieve satisfactory control. A minimum spray volume of 50 gallons per acre is needed for ground broadcast applications.

If using a backpack sprayer, a spray mixture containing 0.75% to 1.25% Vastlan should be used. All purple loosestrife plants should be thoroughly wetted.

3/ Phragmites (*Phragmites australis*)
Phragmites can be selectively controlled with foliar applications of Vastlan. For broadcast applications, a minimum of 2 1/4 lb ae of triclopyr (2 1/4 quarts of Vastlan) per acre should be used. For optimum control, apply Vastlan when phragmites is in the early state of growth, 1/2 to 3 feet in height, prior to seed head development. Follow-up applications for control of regrowth may be made the following year in order to achieve increased control of this weed species. For all applications, a non-ionic surfactant labeled for aquatics should be added to the spray mixture. Follow all directions and use precautions on the label of the surfactant. Thorough wetting of the foliage and stems is necessary to achieve satisfactory control. A minimum spray volume of 50 gallons per acre is recommended for ground broadcast applications.

If a backpack sprayer is used, a spray mixture containing 0.75% to 1.25% of Vastlan should be used. All phragmites foliage should be thoroughly wetted.

Aerial application by helicopter may be needed when treating restoration sites that are inaccessible, remote, difficult to traverse, isolated, or otherwise unsuited to ground application, or in circumstances where invasive exotic weeds dominate native plant populations over extensive areas and efforts to restore native plant diversity are being conducted. By air, apply in a minimum spray volume of 30 gallons per acre.

Cut Surface Treatments
Individual plant treatments such as cut surface applications may be used on any use site listed on this label at a maximum use rate of 6 or 9 quarts of Vastlan (6 lb ae on forestry sites and 9 lb ae of triclopyr on other sites) per acre. These types of applications are made directly to ungrazed parts of plants and, therefore, are not restricted by the grazing maximum rate of 2 quarts of Vastlan (2 lb ae of triclopyr) per acre on a grazed site.

To control unwanted hardwood trees such as elm, maple, oak and conifers in labeled sites, apply Vastlan, either undiluted or diluted in a 1 to 1 ratio with water, as directed below.

Tree Injector Method
Apply by injecting 1/2 milliliter of undiluted Vastlan or 1 milliliter of the diluted solution through the bark at intervals of 3 to 4 inches between centers of the injector wound. The injections should completely surround the tree at any convenient height. **Note: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is injected directly into plants.**

Hack and Squirt Method
Make cuts around the tree trunk at a convenient height with a hatchet or similar equipment so that the cuts overlap slightly and make a continuous circle around the trunk. Spray 1/2 milliliter of undiluted Vastlan or 1 milliliter of the diluted solution into the pocket created between the bark and the inner stem/trunk by each cut.

Frill or Girdle Method
Make a single girdle through the bark completely around the tree at a convenient height. The frill should allow for the herbicide to remain next to the inner stem and absorb into the plant. Wet the cut surface with undiluted or diluted solution.

Both of the above methods may be used successfully at any season except during periods of heavy sap flow of certain species - for example, maples.

Stump Treatment
Spray or paint the cut surfaces of freshly cut stumps and stubs with undiluted Vastlan. The cambium area next to the bark is the most vital area to wet.

Chemical Mowing
Vastlan may be applied to the cut surfaces of weed or brush stubble under the deck of a rotary mower such as the Brown Brush Monitor or other equipment that is designed to uniformly apply the herbicide. This method of application may be used for control of annual and perennial broadleaf weeds and for suppression and stem density reduction of woody species. Apply when growing conditions are favorable and there is active plant growth.

Application

Broadleaf Weed Control: Apply at labeled rates for Vastlan under the section "Broadcast Applications with Ground Equipment - Broadleaf Weed Control". Apply the specified rate in a minimum spray volume of 3 gallons per acre. Follow label directions for herbicides that may be applied in tank mix combination with Vastlan to improve weed control or broaden the spectrum of weeds controlled.

Woody Plant Control: For suppression and stem density reduction of woody species, use 2.25 to 4.5 quarts of Vastlan in a minimum spray volume of 5 gallons per acre. Follow label directions under the woody plant control for herbicides that may be applied in tank mix combination with Vastlan to improve control or broaden the spectrum of woody plants controlled.

Tank mixing: For possible increased effectiveness of this treatment, Vastlan may be tank mixed with other herbicides such as Milestone, Tordon*, Graslan L* or imazapyr. Follow all product use directions and do not exceed maximum labeled use rates.

* Tordon and Graslan L are not registered for use in the states of California and Florida. These products are restricted use pesticides. See product labels for more information.

Forest Management Applications
For best control from broadcast applications of Vastlan, add a surfactant and use a spray volume which will provide thorough plant coverage. Recommended spray volumes are usually 10 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground. For spray volumes less than 50 gallons per acre the additon of a non-ionic surfactant will improve spray coverage. Nozzles or additives that produce larger droplets of spray may require higher spray volumes to maintain brush control.

Forest Site Preparation
Use up to 6 quarts of Vastlan alone and apply in a total spray volume of 10 to 30 gallons per acre or Vastlan may be used in a tank mix with other herbicides such as Graslan L*, Freelex, or 2,4-D amine or low volatile ester in a total spray volume of 10 to 30 gallons per acre. Use a non-ionic surfactant for all foliar applications.

*Graslan L is not registered for use in the states of California and Florida. This product is a restricted use pesticide. Check to ensure tank mix partners are state registered before use. See product label for more information.

Note: Conifers planted sooner than one month after treatment with Vastlan at less than 4 lb ae of triclopyr (4 quarts of Vastlan) per acre or sooner than two months after treatment at 4 to 6 lb ae of triclopyr (4 to 6 quarts of Vastlan) per acre may be injured. When tank mixtures of herbicides are used for forest site preparation, labels for all products in the mixture must be consulted and the longest waiting period before conifer planting must be used.

Directed Spray Applications in Tree Plantations such as for Conifer Release
To release conifers or desirable trees from competing vegetation, mix 3 to 6 quarts of Vastlan in enough water to make 100 gallons of spray mixture. To improve spray coverage, add a non-ionic surfactant. The spray mixture should be directed onto foliage of competitive vegetation using knapsack or backpack sprayers with flat fan nozzles or equivalent any time after vegetation has reached full leaf size, but before autumn coloration. When treating woody plants, it is best if the majority of treated plants are less than 6 feet in height to ensure adequate spray coverage. Use care to direct spray away from contact with foliage of conifers and desirable vegetation as injury or death could occur .

Note: Spray may cause temporary damage and growth suppression where contact with conifers occurs; however, injured conifers should recover and grow normally. Over-the-top spray applications can kill pines.

Broadcast Applications for Conifer Release in the Northeastern United States
To release spruce, fir, red pine and white pine from competing hardwoods, such as red maple, sugar maple, striped maple, alder, birch (white, yellow or gray), aspen, ash, pin cherry and *Rubus* spp. and perennial and annual broadleaf weeds, use Vastlan at rates of 1.5 to 3 quarts per acre alone or with Freelexx, 2,4-D (like DMA 4 IVM), or a low volatile ester to provide no more than 4 lb ae per acre from both products. Apply in late summer or early fall after conifers have formed their over wintering buds and hardwoods are in full leaf and prior to autumn coloration.

Broadcast Applications for Douglas-fir Release in the Pacific Northwest and California

To release Douglas-fir from susceptible competing vegetation such as broadleaf weeds, alder, blackberry or Scotch broom, apply Vastlan at 1 to 1.5 quarts per acre alone or in combination with other herbicides to broaden the spectrum of activity. Apply in early spring after hardwoods begin growth and before Douglas-fir bud break ("early foliar" hardwood stage) or after Douglas-fir seasonal growth has "hardened off" (set winter buds) in late summer, but while hardwoods are still actively growing. When treating after Douglas-fir bud set, apply prior to onset of autumn coloration in hardwood foliage. **Note:** Treatments applied during active Douglas-fir shoot growth (after spring bud break and prior to bud set) may cause injury to Douglas-fir trees.

Christmas Tree Plantations

Use Vastlan for the control of woody plants and annual and perennial broadleaf weeds in established Christmas tree plantations. For best results, apply when woody plants and weeds are actively growing. Vastlan does not control weeds which have not emerged at the time of application. If lower rates are used on hard to control woody species, resprouting may occur the year following treatment. Brush over 8 feet tall is difficult to treat efficiently using hand equipment such as backpack or knapsack sprayers. When treating large brush or trees or hard to control species such as ash, blackgum, choke cherry, elm, hazel, madrone, maples, oaks or sweetgum, and for applications made during drought conditions or in late summer when the leaves are mature, use the higher rates of Vastlan or use cut surface applications (see Cut Surface section above). For foliar applications, use a surfactant and apply in enough water to give uniform and complete coverage of the plants to be controlled. Applications made under drought conditions may provide less than desirable results.

Use Precautions:

- Newly seeded turf (alleyways, etc.) should be mowed two or three times before treatment with Vastlan.
- Use Vastlan where legumes, such as clover, are present only if injury and possible control of legumes can be tolerated.

Use Restrictions:

- Do not use on newly seeded grass until well established as indicated by vigorous growth and development of secondary root system and tillering
- Do not reseed Christmas tree areas treated with Vastlan for a minimum of three weeks after application.
- Apply Vastlan only to established Christmas trees that were planted at least one full year prior to application.
- **Do not apply with 2,4-D containing products.**

Application

Apply in late summer or early autumn after terminal growth of Christmas trees has hardened off but before leaf drop of the target weeds. Apply at a rate of 0.75 to 1.75 quarts of Vastlan per acre as a foliar spray directed toward the base of Christmas trees. Use sufficient spray volume to provide uniform coverage of target plants (20 to 100 gallons per acre). Application rates of Vastlan directed for Christmas trees will only suppress some well established woody plants that are greater than 2 to 3 years old (see table below). Broadcast sprays may also be applied in bands between the rows of planted trees. Use spray equipment that will ensure uniform coverage of the desired spray volume.

Vastlan can cause needle and branch injury to Christmas trees. To minimize injury to Christmas trees, direct sprays so as to avoid or minimize contact with foliage. Blue spruce, white spruce, balsam fir and Frasier fir are less susceptible to injury than white pine and Douglas-fir.

Application Rates and Species Controlled (or also see list above):

Vastlan		
0.75 quart/acre	1.25 to 1.5 quarts/acre	1.75 quarts/acre
clover dandelion dock, curly lambsquarters lespedeza plantain, broadleaf plantain, buckhorn ragweed, common vetch	bindweed, field (TG) blackberry[1] chicory (s) fireweed ivy, ground lettuce, wild oxalis poison ivy smartweed (TG) thistle, Canada (TG) violet, wild Virginia creeper[1]	arrowwood (SDL) aspen beech (SDL) birch (SDL) chinquapin cottonwood (SDL) elderberry grape, wild mulberry (SDL) poplar (SDL) sassafras (SDL) sumac (SDL) sycamore (SDL)

(TG) Top growth control, retreatment may be necessary
(S) Suppression
(SDL) Seedlings less than 2 to 3 years old
[1]Use 1.5 quarts per acre rate

Directed Applications

To control hardwoods such as red maple, sugar maple, striped maple, sweetgum, red and white oaks, ash, alder, birch, aspen, and pin cherry, mix 0.19 to1 pint of Vastlan in enough water to make 3 gallons of spray mixture. For directed applications, do not exceed 6 quarts of Vastlan per acre per year. To improve coverage, add a non-ionic agricultural surfactant to the spray. This spray mixture should be directed onto foliage of competitive hardwoods using knapsack or backpack sprayers with flat fan nozzles or equivalent any time after hardwoods have reached full leaf size, but before autumn coloration (when plants are actively growing). The majority of treated hardwoods should be less than 8 feet in height to ensure adequate spray coverage. **Note:** To prevent Christmas tree injury, care should be taken to direct spray away from contact with Christmas tree foliage.

Aquatic and Wetland Sites

Use Vastlan™ for control of emersed, submersed and floating aquatic plants in aquatic sites such as ponds, lakes, reservoirs, non-irrigation canals, and ditches which have little or no continuous outflow, marshes and wetlands, including broadleaf and woody vegetation on banks and shores within or adjacent to these and other aquatic sites.

Obtain Required Permits: Consult with appropriate state or local water authorities before applying this product to public waters. State or local public agencies may require permits.

Aquatic Application Methods

Use a non-ionic surfactant in the spray mixture to improve control with foliar applications. Follow all directions and use precautions on the aquatic surfactant label.

Surface Application

Use a spray boom, handgun or other similar suitable equipment mounted on a boat or vehicle. Thorough wetting of foliage is essential for maximum effectiveness. Use 20 to 200 gallons per acre of spray mixture. Special precautions such as the use of low spray pressure, large droplet producing nozzles or addition of a labeled thickening agent may minimize spray drift in areas near sensitive crops.

Aerial Application (Helicopter Only)

Apply with a helicopter using a Microfoil or Thru-Valve boom, or a drift control additive in the spray solution. Apply in a minimum of 10 gallons of total spray mix per acre. Do not apply when weather conditions favor drift to sensitive areas. See label section on aerial application directions and precautions.

Floating and Emerged Weeds

Apply when plants are actively growing. For control of waterhyacinth, alligatorweed (see specific directions below), and other susceptible emerged and floating herbaceous weeds and woody plants, apply 1.5 to 6 quarts of Vastlan per acre as a foliar application using surface or aerial equipment. Use higher rates in the rate range when plants are mature, when the weed mass is dense, or for difficult to control species. Repeat as necessary to control regrowth and plants missed in the previous operation, but do not exceed a total of 6 quarts of Vastlan per acre per annual growing season.

Aquatic Weeds

alligatorweed	parrotfeather[1]	purple loosestrife
aquatic sodaapple	phragmites	waterprimose
Eurasian watermilfoil	pickerelweed	
milfoil species	pennywort	

[1]Re-treatment may be needed to achieve desired level of control.

Alligatorweed

Apply Vastlan at 2 to 6 quarts per acre to control alligatorweed. It is important to thoroughly wet all foliage with the spray mixture. For best results, add an approved non-ionic aquatic surfactant to the spray mixture. Alligatorweed growing outside the margins of a body of water can be controlled with this treatment. However, alligatorweed growing in water will only be partially controlled. Top growth above the water will be controlled, but the plant will likely regrow from tissue below the water surface.

Restrictions for Potable Water Intakes for Emerged Aquatic Weed Control– Lakes, Reservoirs, Ponds:

See chart below for specific setback distances near functioning potable water intakes.

Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

	Vastlan Application Rate			
Area Treated	**1.5 qt/acre**	**3 qt/acre**	**4.5 qt/acre**	**6 qt/acre**
(acres)	**Setback Distance (ft)**			
4	0	200	400	500
>4 - 8	0	200	700	900
>8 - 16	0	200	700	1000
>16	0	200	900	1300

To apply Vastlan around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 0.4 parts per million (ppm) or less by laboratory analysis or immunoassay.

Recreational Use of Water in Treatment Area: There are no restrictions on use of water in the treatment area for recreational purposes, including swimming and fishing.
Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Submerged Weeds

For control of Eurasian watermilfoil and other susceptible submerged weeds in ponds, lakes, reservoirs, and in non-irrigation canals or ditches that have little or no continuous outflow, apply Vastlan as either a surface or subsurface application. Select rates according to the rate chart below to provide a triclopyr concentration of 0.75 to 2.5 ppm ae in treated water. Use higher rates in the rate range in areas of greater water exchange. These areas may require a repeat application. However, total application of Vastlan must not exceed an application rate of 2.5 ppm of triclopyr for the treatment area per annual growing season.

Apply in spring or early summer when Eurasian watermilfoil or other submersed weeds are actively growing.

Areas near susceptible crops or other desirable broadleaf plants may be treated by subsurface injection applied by boat to avoid spray drift.

Surface Application
Apply the desired amount of Vastlan as either a concentrate or a spray mixture in water. However, use a minimum spray volume of 5 gallons per acre. Do not apply when weather conditions favor drift to sensitive areas.

Average water depth (feet) x 0.678 x target concentration (ppm) = gallons of Vastlan per surface acre treated.

Example: to achieve a 2 ppm concentration of triclopyr in water averaging 4 feet deep

4 x 0.678 x 2 ppm = 5.4 gallons of Vastlan per surface acre treated

	Concentration of Triclopyr Acid in Water (ppm ae)				
	0.75 ppm	**1 ppm**	**1.5 ppm**	**2 ppm**	**2.5 ppm**
Water Depth (ft)	**Gallons of Vastlan per Surface Acre at Specified Depth**				
1	0.5	0.7	1.0	1.4	1.7
2	1.0	1.4	2.0	2.7	3.4
3	1.5	2.0	3.1	4.1	5.1
4	2.0	2.7	4.1	5.4	6.8
5	2.5	3.4	5.1	6.8	8.5
6	3.1	4.1	6.1	8.1	10.2
7	3.6	4.7	7.1	9.5	11.9
8	4.1	5.4	8.1	10.8	13.6
9	4.6	6.1	9.2	12.2	15.3
10	5.1	6.8	10.2	13.6	17.0
15	7.6	10.2	15.3	20.3	25.4
20	10.2	13.6	20.3	27.1	33.9

Subsurface Application
Apply desired amount of Vastlan per acre directly into the water through boat-mounted distribution systems. When treating target plants that are 6 feet below the surface of the water, trailing hoses should be used along with an aquatic approved sinking agent (except California).

Restrictions for Potable Water Intakes for Submerged Weed Control – Lakes, Reservoirs, Ponds:
For applications of Vastlan to control submerged weeds in lakes, reservoirs or ponds that contain a functioning potable water intake for human consumption, see the chart below to determine the minimum setback distances of the application from the functioning potable water intakes.

Area Treated (acres)	Concentration of Triclopyr Acid in Water (ppm ae)				
	0.75 ppm	1 ppm	1.5 ppm	2 ppm	2.5 ppm
	Required Setback Distance (ft) from Potable Water Intake				
<4	300	400	600	800	1000
>4 – 8	420	560	840	1120	1400
>8 – 16	600	800	1200	1600	2000
>16 – 32	780	1040	1560	2080	2600
>32 acres, calculate a setback using the formula for the appropriate rate	Setback (ft) = (800*ln (acres) – 160)/3.33	Setback (ft) = (800*ln (acres) – 160)/2.50	Setback (ft) = (800*ln (acres) – 160)/1.67	Setback (ft) = (800*ln (acres) – 160)/1.25	Setback (ft) = (800*ln (acres) – 160)

Example Calculation 1: to apply 2.5 ppm Vastlan to 50 acres:

Setback in feet = (800 x ln (50 acres) - 160
= (800 x 3.912) – 160
= 2970 feet

Example Calculation 2: to apply 0.75 ppm Vastlan to 50 acres:

Setback in feet = (800 x ln (50 acres) - 160
3.33
= (800 x 3.912) – 160
3.33
= 892 feet

Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

To apply Vastlan around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 0.4 parts per million (ppm) or less by laboratory analysis or immunoassay.

Wetland Sites

Wetlands include flood plains, deltas, marshes, swamps, bogs, and transitional areas between upland and lowland sites. Wetlands may occur within noncropland, rangeland, pastures, forests, wildlife habitat restoration and management areas and similar sites as well as areas adjacent to or surrounding domestic water supply reservoirs, lakes and ponds.

For control of woody plants and broadleaf weeds in wetland sites, follow use directions and application methods on this label for terrestrial sites.

Note: Consult local public water control authorities before applying this product in and around public water. Permits may be required to treat such areas.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. To the extent permitted by law, otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent permitted by law, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Label Code: D02-409-003
Replaces Label: D02-409-002
LOES Number: 010-02328

EPA accepted 12/06/17

Revisions:

1. Updated MOA box per PR Notices 2017-1/2
2. Updated storage temperature under Storage and Disposal section.
3. Deleted the following restriction: Do not apply using fixed wing aircraft.
4. Updated the Aerial Application section under Avoiding Injurious Spray Drift and Use Information sections by deleting Helicopter Only and adding fixed wing language. The aerial fixed wing application language can be found on other triclopyr labels (e.g. Garlon 4)
5. Updated language for High Volume Foliage Treatment under Woody Plant Control with Ground Equipment for Noncropland sites.
6. Updated title and language under Foliage Treatment (Non-Grazed/ Non-Hayed Areas) section.
7. Added the following under the Foliage Treatment (Range and Pasture and Grazed/Hayed Areas) section:
    a. Check to ensure tank mix partners are state registered before use.
8. Updated rates under Cut Surface Treatment section.
9. Updated language under Forest Site Preparation section.
10. Updated rate for Directed Applications under Christmas Tree Plantations.
11. Corrected Vastlan's application rates calculations and units throughout the label.
12. Deleted "in a water spray" for the following sentence under Foliage Treatment:
    a. Use 1 to 2 quarts of Vastlan per acre in a water spray.
13. Added "containing products" to the following restriction under Christmas Tree Plantations:
    a. Do not apply with 2,4-D…

SAFETY DATA SHEET
DOW AGROSCIENCES LLC

Product name: VASTLAN™ Herbicide

Issue Date: 03/09/2016
Print Date: 03/09/2016

DOW AGROSCIENCES LLC encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. IDENTIFICATION

Product name: VASTLAN™ Herbicide

Recommended use of the chemical and restrictions on use
Identified uses: End use herbicide product

COMPANY IDENTIFICATION
DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD
INDIANAPOLIS IN 46268-1053
UNITED STATES

Customer Information Number: 800-992-5994
info@dow.com

EMERGENCY TELEPHONE NUMBER
24-Hour Emergency Contact: 800-992-5994
Local Emergency Contact: 352-323-3500

2. HAZARDS IDENTIFICATION

Hazard classification
This material is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.
Acute toxicity - Category 4 - Oral
Eye irritation - Category 2A
Skin sensitisation - Sub-category 1B

Label elements
Hazard pictograms

Signal word: **WARNING!**

Hazards
Harmful if swallowed.
May cause an allergic skin reaction.
Causes serious eye irritation.

Precautionary statements

Prevention
Avoid breathing dust/ fume/ gas/ mist/ vapours/ spray.
Wash skin thoroughly after handling.
Do not eat, drink or smoke when using this product.
Contaminated work clothing should not be allowed out of the workplace.
Wear eye protection/ face protection.
Wear protective gloves.

Response
IF SWALLOWED: Call a POISON CENTER or doctor/ physician if you feel unwell. Rinse mouth.
IF ON SKIN: Wash with plenty of soap and water.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
If skin irritation or rash occurs: Get medical advice/ attention.
If eye irritation persists: Get medical advice/ attention.
Wash contaminated clothing before reuse.

Disposal
Dispose of contents/ container to an approved waste disposal plant.

Other hazards
No data available

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical nature: Mixture
This product is a mixture.

Component	CASRN	Concentration
Triclopyr, Choline salt	1048373-85-8	54.72%
Glycerol	56-81-5	3.0%
Balance	Not available	42.28%

4. FIRST AID MEASURES

Description of first aid measures

General advice: First Aid responders should pay attention to self-protection and use the recommended protective clothing (chemical resistant gloves, splash protection). If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Skin contact: Take off contaminated clothing. Wash skin with soap and plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Wash clothing before reuse. Shoes and other leather items which cannot be decontaminated should be disposed of properly.

Eye contact: Hold eyes 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 eyes. Call a poison control center or doctor for treatment advice. Suitable emergency eye wash facility should be available in work area.

Ingestion: 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. Never give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed: Aside from the information found under Description of first aid measures (above) and Indication of immediate medical attention and special treatment needed (below), any additional important symptoms and effects are described in Section 11: Toxicology Information.

Indication of any immediate medical attention and special treatment needed
Notes to physician: No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

5. FIREFIGHTING MEASURES

Suitable extinguishing media: Water fog or fine spray. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Do not use direct water stream. May spread fire. Alcohol resistant foams (ATC type) are preferred. General purpose synthetic foams (including AFFF) or protein foams may function, but will be less effective.

Unsuitable extinguishing media: No data available

Special hazards arising from the substance or mixture
Hazardous combustion products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating. Combustion products may include and are not limited to: Nitrogen oxides. Carbon monoxide. Carbon dioxide.

Unusual Fire and Explosion Hazards: Violent steam generation or eruption may occur upon application of direct water stream to hot liquids.

Advice for firefighters
Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Consider feasibility of a controlled burn to minimize environment damage. Foam fire extinguishing system is preferred because uncontrolled water can spread possible contamination. Do not use direct water

stream. May spread fire. Burning liquids may be moved by flushing with water to protect personnel and minimize property damage. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the "Accidental Release Measures" and the "Ecological Information" sections of this (M)SDS.

Special protective equipment for firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures: Isolate area. Keep unnecessary and unprotected personnel from entering the area. Refer to section 7, Handling, for additional precautionary measures. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

Environmental precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

Methods and materials for containment and cleaning up: Contain spilled material if possible. Small spills: Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance. See Section 13, Disposal Considerations, for additional information.

7. HANDLING AND STORAGE

Precautions for safe handling: Keep out of reach of children. Do not swallow. Avoid contact with eyes, skin, and clothing. Avoid prolonged or repeated contact with skin. Avoid breathing vapor or mist. Wash thoroughly after handling. Use with adequate ventilation. See Section 8, EXPOSURE CONTROLS AND PERSONAL PROTECTION.

Conditions for safe storage: Store in a dry place. Store in original container. Keep container tightly closed when not in use. Do not store near food, foodstuffs, drugs or potable water supplies.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Exposure limits are listed below, if they exist.

Component	Regulation	Type of listing	Value/Notation
Glycerol	OSHA Z-1	TWA mist, respirable fraction	5 mg/m3
	OSHA Z-1	TWA mist, total dust	15 mg/m3

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING.

Exposure controls
Engineering controls: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations. Local exhaust ventilation may be necessary for some operations.

Individual protection measures

Eye/face protection: Use chemical goggles.

Skin protection

Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Butyl rubber. Natural rubber ("latex"). Neoprene. Nitrile/butadiene rubber ("nitrile" or "NBR"). Polyethylene. Ethyl vinyl alcohol laminate ("EVAL"). Polyvinyl chloride ("PVC" or "vinyl"). NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.

Other protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task.

Respiratory protection: Respiratory protection should be worn when there is a potential to exceed the exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. For most conditions no respiratory protection should be needed; however, if discomfort is experienced, use an approved air-purifying respirator.
The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	
Physical state	Liquid.
Color	Black
Odor	Characteristic
Odor Threshold	No data available
pH	7.0 *pH Electrode*
Melting point/range	Not applicable
Freezing point	No data available
Boiling point (760 mmHg)	No data available
Flash point	**closed cup** > 100 °C (> 212 °F) *Pensky-Martens Closed Cup ASTM D 93*
Evaporation Rate (Butyl Acetate = 1)	No data available
Flammability (solid, gas)	No data available
Lower explosion limit	No data available

Upper explosion limit	No data available
Vapor Pressure	No data available
Relative Vapor Density (air = 1)	No data available
Relative Density (water = 1)	No data available
Water solubility	No data available
Partition coefficient: n-octanol/water	No data available
Auto-ignition temperature	No data available
Decomposition temperature	No data available
Dynamic Viscosity	No data available
Kinematic Viscosity	No data available
Explosive properties	No data available
Oxidizing properties	No data available
Liquid Density	1.235 g/ml at 20 °C (68 °F) *Digital density meter*
Molecular weight	No data available

NOTE: The physical data presented above are typical values and should not be construed as a specification.

10. STABILITY AND REACTIVITY

Reactivity: No dangerous reaction known under conditions of normal use.

Chemical stability: Thermally stable at typical use temperatures.

Possibility of hazardous reactions: Polymerization will not occur.

Conditions to avoid: Exposure to elevated temperatures can cause product to decompose.

Incompatible materials: Avoid contact with: Strong oxidizers.

Hazardous decomposition products: Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Carbon monoxide. Carbon dioxide. Nitrogen oxides.

11. TOXICOLOGICAL INFORMATION

Toxicological information appears in this section when such data is available.

Acute toxicity

Acute oral toxicity

Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury.

For similar material(s):
LD50, Rat, female, 1,000 mg/kg OECD Test Guideline 423

Acute dermal toxicity
Prolonged skin contact is unlikely to result in absorption of harmful amounts.

For similar material(s):
LD50 Dermal, Rat, male and female, > 5,000 mg/kg OECD Test Guideline 402No deaths occurred at this concentration.

Acute inhalation toxicity
No adverse effects are anticipated from single exposure to mist. Based on the available data, respiratory irritation was not observed.

For similar material(s):
LC50, Rat, male and female, 4 Hour, dust/mist, > 5.85 mg/l OECD Test Guideline 403 No deaths occurred at this concentration.

Skin corrosion/irritation
Brief contact is essentially nonirritating to skin.

Serious eye damage/eye irritation
May cause moderate eye irritation.
May cause slight corneal injury.

Sensitization
For similar material(s):
Has demonstrated the potential for contact allergy in mice.

For respiratory sensitization:
No relevant data found.

Specific Target Organ Systemic Toxicity (Single Exposure)
Evaluation of available data suggests that this material is not an STOT-SE toxicant.

Specific Target Organ Systemic Toxicity (Repeated Exposure)
For similar active ingredient(s).
Triclopyr.
In animals, effects have been reported on the following organs:
Kidney.
Liver.

For the minor component(s):
Excessive exposure to glycerine may cause increased fat levels in blood.

Carcinogenicity
For similar active ingredient(s). Triclopyr. Did not cause cancer in laboratory animals.

Teratogenicity
For similar active ingredient(s). Triclopyr. Did not cause birth defects or other effects in the fetus even at doses which caused toxic effects in the mother.

Reproductive toxicity
For similar active ingredient(s). Triclopyr. In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals. For the minor

component(s): Reproductive effects seen in female animals are believed to be due to altered nutritional states resulting from extremely high doses of glycerine given in the diet. Similar effects have been seen in animals fed synthetic diets.

Mutagenicity
For similar active ingredient(s). Triclopyr. In vitro genetic toxicity studies were negative. Animal genetic toxicity studies were negative.

Aspiration Hazard
Based on physical properties, not likely to be an aspiration hazard.

12. ECOLOGICAL INFORMATION

Ecotoxicological information appears in this section when such data is available.

Toxicity

Triclopyr, Choline salt

Acute toxicity to fish
For similar active ingredient(s).
Material is slightly toxic to aquatic organisms on an acute basis (LC50/EC50 between 10 and 100 mg/L in the most sensitive species tested).
For similar active ingredient(s).
LC50, Oncorhynchus mykiss (rainbow trout), 96 Hour, 117 mg/l

Acute toxicity to aquatic invertebrates
For similar active ingredient(s).
LC50, Daphnia magna (Water flea), 48 Hour, 133 mg/l

Acute toxicity to algae/aquatic plants
Based on information for a similar material:
ErC50, Pseudokirchneriella subcapitata (green algae), 96 Hour, Biomass, 87.7 mg/l

Glycerol

Acute toxicity to fish
Material is practically non-toxic to aquatic organisms on an acute basis (LC50/EC50/EL50/LL50 >100 mg/L in the most sensitive species tested).
LC50, Pimephales promelas (fathead minnow), static test, 96 Hour, >= 885 mg/l, Method Not Specified.

Acute toxicity to aquatic invertebrates
LC50, Daphnia magna (Water flea), static test, 48 Hour, 1,955 mg/l, Method Not Specified.

Acute toxicity to algae/aquatic plants
EC50, Other, static test, 192 Hour, Growth inhibition (cell density reduction), 2,900 mg/l, Method Not Specified.

Toxicity to bacteria
EC50, activated sludge, 3 Hour, > 1,000 mg/l, OECD 209 Test

Balance

Acute toxicity to fish

No relevant data found.

Persistence and degradability

Triclopyr, Choline salt

Biodegradability: For similar active ingredient(s). Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD > 40%).

Glycerol

Biodegradability: Material is readily biodegradable. Passes OECD test(s) for ready biodegradability.
10-day Window: Not applicable
Biodegradation: 63 %
Exposure time: 14 d
Method: OECD Test Guideline 301C or Equivalent

Theoretical Oxygen Demand: 1.22 mg/mg

Balance

Biodegradability: No relevant data found.

Bioaccumulative potential

Triclopyr, Choline salt

Bioaccumulation: For similar active ingredient(s). Bioconcentration potential is low (BCF < 100 or Log Pow < 3).

Glycerol

Bioaccumulation: Bioconcentration potential is low (BCF < 100 or Log Pow < 3).
Partition coefficient: n-octanol/water(log Pow): -1.76 at 20 °C Measured

Balance

Bioaccumulation: No relevant data found.

Mobility in soil

Triclopyr, Choline salt

For similar active ingredient(s).
Triclopyr.
Potential for mobility in soil is very high (Koc between 0 and 50).

Glycerol

Potential for mobility in soil is very high (Koc between 0 and 50).
Given its very low Henry's constant, volatilization from natural bodies of water or moist soil is not expected to be an important fate process.
Partition coefficient(Koc): 1 Estimated.

Balance

No relevant data found.

13. DISPOSAL CONSIDERATIONS

Disposal methods: If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

14. TRANSPORT INFORMATION

DOT

Not regulated for transport

Classification for SEA transport (IMO-IMDG):

Not regulated for transport

Transport in bulk according to Annex I or II of MARPOL 73/78 and the IBC or IGC Code Consult IMO regulations before transporting ocean bulk

Classification for AIR transport (IATA/ICAO):

Not regulated for transport

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Transportation classifications may vary by container volume and may be influenced by regional or country variations in regulations. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. REGULATORY INFORMATION

OSHA Hazard Communication Standard
This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312
Immediate (acute) Health Hazard

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313
This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

Pennsylvania Worker and Community Right-To-Know Act:
The following chemicals are listed because of the additional requirements of Pennsylvania law:

Components	**CASRN**
Glycerol	56-81-5

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

United States TSCA Inventory (TSCA)
This product contains chemical substance(s) exempt from U.S. EPA TSCA Inventory requirements. It is regulated as a pesticide subject to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements.

Federal Insecticide, Fungicide and Rodenticide Act
EPA Registration Number: 62719-687
This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

WARNING

May be fatal if swallowed.
Causes substantial but temporary eye injury
Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

16. OTHER INFORMATION

Hazard Rating System
NFPA

Health	Fire	Reactivity
1	1	0

Revision
Identification Number: 102976496 / A211 / Issue Date: 03/09/2016 / Version: 1.1
DAS Code: GF-3169
Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

OSHA Z-1	USA. Occupational Exposure Limits (OSHA) - Table Z-1 Limits for Air Contaminants
TWA	8-hour time weighted average

Information Source and References

This SDS is prepared by Product Regulatory Services and Hazard Communications Groups from information supplied by internal references within our company.

DOW AGROSCIENCES LLC urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

SPECIMEN LABEL

Krenite® S

Brush Control Agent

Water-Soluble Liquid

ACTIVE INGREDIENT:	**BY WEIGHT**
Ammonium salt of fosamine [ethyl hydrogen (aminocarbonyl) phosphonate]	41.5%
OTHER INGREDIENTS	58.5%
TOTAL	100.0%

Contains 4 Lbs. Active Ingredient per Gallon.

EPA Reg. No. 42750-247

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.)

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.

Have the product container label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for medical emergencies involving this product.

See inside booklet for additional PRECAUTIONARY STATEMENTS.

Manufactured for:

ALBAUGH, INC.

1525 NE 36th Street
Ankeny, Iowa 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE, CALL CHEMTREC (800) 424-9300

AD052510
PRODUCT OF CHINA

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION! Causes (moderate) eye injury (irritation). Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

1. Long-sleeved shirt and long pants
2. Shoes plus socks

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

USER SAFETY RECOMMENDATIONS

USERS SHOULD: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

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 by cleaning of equipment or disposal of equipment washwaters.

PRODUCT INFORMATION

KRENITE® S brush control agent is a water-soluble liquid to be diluted with water and applied as a foliar spray for control and/or suppression of many woody species.

KRENITE® S may be applied for use in pine plantations and non-crop sites, including highway rights-of-way, industrial sites, railroad rights-of-way, storage areas, utility and pipeline rights-of-way.

This product may be applied in pine plantations and non-crop sites that contain areas of temporary surface water caused by collection of water between planting beds, in equipment ruts, or in other depressions created by management activities. It is permissible to treat intermittent drainage, intermittently flooded low-lying sites, seasonally dry flood plains and transitional areas between upland and lowland sites when no water is present. It is also permissible to treat marshes, swamps and bogs after water has receded, as well as seasonally dry flood deltas. **DO NOT** make applications to natural or man-made bodies of water, such as lakes, reservoirs, ponds, streams and canals.

KRENITE® S is non-flammable and nonvolatile.

ENVIRONMENTAL CONDITIONS AND BIOLOGICAL ACTIVITY

A KRENITE® S spray directed to only part of susceptible brush species will provide control of the portion sprayed, resulting in a trimming effect. Treatment with KRENITE® S generally does not immediately affect deciduous woody plants; they retain normal foliage for the remainder of the growing season. Treated susceptible plants do not produce foliage or grow the following spring. Coniferous species treated with KRENITE® S generally displays visible symptoms following application.

Effectiveness may be reduced if, following treatment, rainfall occurs on the same day.

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.

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.

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.

TANK MIXES

KRENITE® S herbicide may be tank mixed with other herbicides and/or adjuvant registered for use in pine plantations and non-crop sites.

Follow all use directions, precautions, and restrictions on labels of tank-mixed products.

SPRAY EQUIPMENT

KRENITE® S may be applied using high volume or low volume ground sprayers as well as aircraft (helicopter only).

Application equipment must be calibrated before making applications of KRENITE® S.

SPRAY ADJUVANTS

A penetrating type oil-based adjuvant (surfactant or crop oil concentrate) may be used with KRENITE® S. The adjuvant should be mixed in the spray solution at a minimum concentration of 1/4% by volume (1 quart per 100 gallons of spray solution) or at the manufacturer's recommended dosage.

If foaming is a problem during mixing, an anti-foam agent may be added.

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.

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

Do not use on food or feed crops.

KRENITE® S must be used only in accordance with the labeling, or in supplemental Albaugh, Inc. labeling.

AGRICULTURAL USES

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 12 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:

1. Coveralls
2. Shoes plus socks

PINE PLANTATIONS PREPARATION SITE

KRENITE® S may be applied for the post-harvest (pre-plant) control of undesirable pine and hardwood seedlings and saplings and suppression of brush and vines to aid site planting preparation for southern pines and/or genetically improved pines.

APPLICATION INFORMATION

Apply as a foliar spray from mid-summer to when the target tree pests begin defoliation in late summer or fall. Applications of KRENITE® S may be made by ground or air (helicopter only) equipment. Use sufficient water to ensure complete coverage of the vegetation, 20 to 50 gallons per acre by ground and 10 to 15 gallons per acre by air.

USE RATES AND PLANTS CONTROLLED

Pine Seedlings and Saplings

Apply 2 to 4 quarts of KRENITE® S per acre for the control of seedling and sapling pines when burning is allowed on the site.

Apply 4 to 6 quarts per acre of KRENITE® S to control seedling and sapling pines when burning is not allowed on the site.

Use the higher rate when either pine saplings predominate or when high infestations of seedling pines are in the area to be sprayed.

Combinations of Pine and Hardwood Seedlings and Saplings

To control a combination of pine and hardwood seedlings and saplings, apply a tank mixture of KRENITE® S at use rates indicated for spraying pine seedlings and saplings plus Imazapyr (4 pound active per gallon) at 8 to 20 ounces per acre. This tank mix may be applied for the control of Ash, Blackberry, Black gum, Black locust, Box elder, Cherry, Dogwood, Elms (winged, slippery), Oaks (red, white), Red maple, Sassafras, and Sourwood.

Follow all use directions, precautions and restrictions on Imazapyr product labels.

Brush and Vine Suppression

The application of KRENITE® S plus Imazapyr will also provide suppression of brush and vines, such as, American beautyberry (French mulberry), Baccharis (groundsel tree), Vaccinium (blueberry) species, Wax myrtle (bayberry) and Wild grape.

*Suppression – a visible reduction in plant population and/or plant vigor as compared to an untreated area and generally not accepted as control.

Do not apply more than 3 gallons of KRENITE® S per acre per year.

NON-AGRICULTURAL USES

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.

Do not enter or allow entry into treated areas until sprays have dried to perform hand tasks.

NON-CROP SITES

KRENITE® S may be applied for general weed control as follows: uncultivated non-agricultural areas (such as airports, highway, railroad and utility rights-of-way, sewage disposal areas); uncultivated agricultural areas (non-crop producing, which includes: farmyards, fuel storage areas, fence rows, barrier strips); industrial sites (outdoor, such as lumberyards, pipeline and tank farms).

APPLICATION INFORMATION

Make a foliar application of the recommended rate of KRENITE® S from full leaf expansion in the spring to the development of full canopy coloration in the fall for deciduous species to be controlled. Coniferous species, listed in the “USE RATES AND PLANTS CONTROLLED” chart below, may be treated at anytime during the growing season.

LOW- AND HIGH-VOLUME DIRECTED SPRAYS

Prepare either a low-volume or high-volume spray solution of KRENITE® S. For the low-volume directed spray application, do not exceed a spray concentration of 30% by volume. For the high-volume directed spray application, do not use a spray concentration of less than 1.5% by volume.

Prepare the desired volume of spray solution by mixing the amount of this product in water as shown in the Spray Solution Table. Apply a quantity of spray solution which will thoroughly and uniformly cover the target plant foliage (spray to wet for high-volume applications). Rate and volume per acre will depend on the plant species, the height and density of plant growth as well as the type of application equipment used. On tall or dense stands of brush it may be necessary to spray from opposite sides in order to obtain thorough coverage of the foliage. Use the higher rate range on stands where difficult-to-control species are dominant. See the “USE RATES AND PLANTS CONTROLLED” section of the label for use rates and a listing of **difficult-to-control species.

Do not apply more than 6 gallons of KRENITE® S per acre per year.

AERIAL and BROADCAST APPLICATIONS

Prepare a spray solution using 1-1/2 to 3 gallons of KRENITE® S in 10 to 40 gallons of water (see Spray Solution Table). For broadcast ground applications, use this product at the rate of 1.5 to 6 gallons per acre. Do not apply more than 6 gallons per acre when using ground equipment. For aerial applications, use this product at the rate of 1.5 to 3 gallons per acre. Do not apply more than 3 gallons of KRENITE® S per acre when using aerial equipment. Use sufficient spray volume to uniformly and thoroughly cover the foliage. Use the higher concentrations on stands in which difficult-to-control species are predominant (see "USE RATES AND PLANTS CONTROLLED" section for a listing of **difficult-to-control species).

SPRAY SOLUTION TABLE

Desired Volume	Amount of KRENITE® S						
	1.5%	2%	3%	4%	10%	20%	30%
5 Gal	**	**	**	0.8 qt	0.5 gal	1 gal	1.5 gal
10 Gal	0.6 qt	0.8 qt	1.2 qt	1.6 qt	1 gal	2 gal	3 gal
20 Gal	1.2 qt	1.6 qt	0.6 gal	0.8 gal	2 gal	4 gal	6 gal
30 Gal	0.45 gal	0.6 gal	0.9 gal	1.2 gal	3 gal	6 gal	**
40 Gal	0.6 gal	0.8 gal	1.2 gal	1.6 gal	4 gal	**	**
50 Gal	0.75 gal	1 gal	1.5 gal	2 gal	5 gal	**	**
100 Gal	1.5 gal	2 gal	3 gal	4 gal	**	**	**

USE RATES AND PLANTS CONTROLLED

KRENITE® S effectively controls or suppresses (**difficult-to-control listings) the following plants when applied at the use rates shown.

**Suppression – a visible reduction in plant population and/or plant vigor as compared to an untreated area and generally not accepted as control.

1-1/2 to 6 gal KRENITE® S per acre			
Alder, red	*Alnus rubra*	Oak, red	*Quercus rubra*
Ash, white	*Fraxinus Americana*	Oak, water	*Quercus arkansana*
Aspen, quaking	*Populus tremuloides*	Oak, white	*Quercus alba*
Birch	*Betula* sp.	Persimmon**	*Diospyros virginiana*
Blackberry	*Rubus* sp.	Pine, loblolly	*Pinus taeda*
Blackgum	*Nyssa sylvatica*	Pine, Virginia	*Pinus virginiana*
Cherry, black**	*Prunus serotina*	Poplar, yellow (tulip tree)**	*Liriodendron tulipifera*
Cherry, pin	*Prunus pensylvanica*	Salmonberry	*Rubus spectabilis*
Chokecherry, common**	*Prunus virginiana*	Sassafras**	*Sassafras sassafras*
Elm**	*Ulmus* sp.	Sourwood**	*Oxydendrum arboretum*
Fern, bracken	*Pteridium acquilinum*	Spurge, leafy***	*Euphoribia ésula*
Hawthorn**	*Crataegus* sp.	Sumac	*Rhus* sp.
Hickory**	*Carya* sp.	Sweetgum	*Liquidambar styraciflua*
Locust, black	*Robinia pseudoaccacia*	Tallow, Chinese	*Sapium Sebiferum*
Maple, bigleaf**	*Acer macrophyllum*	Thimbleberry	*Rubus parviflorus*
Maple, red**	*Acer rubrum*	Willow**	*Salix* sp.
Maple, vine	*Acer circinatum*		

2 to 6 gal KRENITE® S per acre			
Basswood, American**	*Tilia Americana*	Grape, wild	*Vitis* sp.
Bindweed, field***	*Convolvulus arvensis*	Pine, Eastern white	*Pinus strobes*
Cottonwood, Eastern	*Populus deltoids*	Plum, wild	*Prunus munsoniana*
Elder, American	*Sambucus canadenis*	Rose, multiflora	*Rosa multiflora*
Elm, slippery	*Ulmus rubra*	Sycamore	*Platanus occidentalis*
Elm, winged**	*Ulmus alata*	Tree-of-heaven	*Ailanthus altissima*

**Difficult-to-control or Suppression
Suppression – A visible reduction in plant population and/or plant vigor as compared to an untreated area and generally not accepted as control.

***Make applications after plants begin to bloom.

TANK MIXTURES

KRENITE® S plus ESCORT XP

KRENITE® S plus ESCORT XP may be applied for the control of Eastern red cedar and improved control of Ailanthus (tree of heaven), Ash, Cherry, Elm and Red maple.

Apply 1.5 to 3 gallons of KRENITE® S plus 1 to 2 ounces of ESCORT XP per acre. Apply a quantity of spray solution that will thoroughly and uniformly cover the target brush/trees without causing unnecessary run-off (spray to wet). If the site contains difficult-to-control species (see ** in "USE RATES AND PLANTS CONTROLLED" section), use the higher rates of both KRENITE® S and ESCORT XP.

Follow the use directions, precautions and restrictions on the ESCORT XP label.

KRENITE® S plus imazapyr

KRENITE® S plus imazapyr herbicide (2 pounds active ingredient per gallon) may be applied for the control of Box elder, Hackberry, Persimmon, Wild pecan and Dogwood and for improved control of Ash, Black Cherry, Elm, Maple, Sassafras and Willow.

Apply 1.5 to 3 gallons of KRENITE® S plus 8 to 20 ounces of imazapyr per acre. Apply a quantity of the spray solution that will thoroughly and uniformly cover the target brush without causing unnecessary run-off (spray to wet). If the site contains difficult-to-control species (see ** in "USE RATES AND PLANTS CONTROLLED" section), use the higher rates of both KRENITE® S and imazapyr.

Follow the use directions, precautions and restrictions on the Imazapyr label.

KRENITE® S plus picloram

KRENITE® S plus picloram (2 pound active per gallon) herbicide may be applied for the control of Hackberry, Persimmon, and Walnut for improved control of Cherry, Elm, Hickory, Locust, Oak, Poplar, Sassafras, Sumac, and Sweet gum.

Apply 1.5 to 3 gallons of KRENITE® S plus 1 to 2 pints of picloram per acre. Apply a quantity of the spray solution that will thoroughly and uniformly cover the target brush without causing unnecessary run-off (spray to wet). If the site contains difficult-to-control species (see ** in "USE RATES AND PLANTS CONTROLLED" section), use the higher rates of both KRENITE® S and picloram.

Follow the use directions, precautions and restrictions on the picloram label.

SIDE TRIMMING

For control of only a portion of a plant, direct the spray solution to thoroughly cover (spray to wet) only the portion of the plant to be controlled.

Do not apply more than 6 gallons of KRENITE® S per acre when side trimming.

CUT SURFACE APPLICATIONS

KRENITE® S may be used for controlling the re-sprouting of cut stumps of the plants listed in the "USE RATES AND PLANTS CONTROLLED" section. Control of re-sprouting in plants listed as "difficult to control" may not be as effective.

KRENITE® S may either be used undiluted or mixed with water. Use the method that is best suited for the particular application equipment. When mixing with water a ratio of no less than 1 part KRENITE® S to 1 part water on a volume basis must be used. Apply the undiluted or mixed solution to wet the area adjacent to the cambium and bark around the entire circumference and the sides of the cut stumps. The sides of the stumps should be wet down to the root collar area.

Apply with appropriate application equipment using low spray pressure. Applications can be made any time of the year, except during periods of heavy sap flow in the spring. Applications should be made soon after cutting, before the stump surface forms a layer of callous tissue (hardens off).

To prevent freezing of the spray solution, add ethylene glycol (commercial antifreeze) to the water used in preparing the spray solution. Add the antifreeze according to the manufacturer's label for preventing freezing of water at the lowest expected ambient temperature. KRENITE® S will freeze at -11°F. A 1:1 aqueous dilution of KRENITE® S will freeze at 21°F.

A spray pattern indicator may be used in the spray solution to facilitate application. The user should check the compatibility of the spray indicator with the spray solution prior to using large quantities.

ADDITIONAL USE INSTRUCTIONS – PINE PLANTATIONS AND NON-CROP SITES

MIXING INSTRUCTIONS

1. Fill spray tank 1/2 full of water.
2. With the agitator running, add the desired amount of KRENITE® S.
3. If using a tank mix partner, add the recommended amount. Follow the use precautions and directions on the tank mix partner label.
4. Add spray adjuvant as last ingredient prior to filling the spray tank with water.
5. Agitate the spray solution thoroughly.

After KRENITE® S has been thoroughly mixed in the spray tank, agitation of the spray solution is not required.

SPRAY CLEAN-UP

Thoroughly clean all mixing and spray equipment immediately following applications of KRENITE® S. Flush tank, pump, hoses and boom with several changes of water after removing the nozzle tips and screens (clean these parts separately).

Dispose of the rinsate on a labeled site or at an approved waste disposal facility.

SPRAY DRIFT MANAGEMENT

The interaction of many equipment- and weather-related factors determines the potential for spray drift. The applicator is responsible for considering all of these factors when making applications.

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 (HELICOPTER)

- 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 airstream 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 AND HEIGHT

- Boom Length (helicopter) – For helicopters use a boom length and position that prevents droplets from entering the rotor vortices.
- Boom Height (helicopter) – Application more than 10 feet above the canopy increases the potential for spray drift.
- Boom Height (ground) – Setting the boom at the lowest height which provides uniform coverage reduces the exposure of droplets to evaporation and wind. 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 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 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.

IMPORTANT PRECAUTIONS – PINE PLANTATIONS AND NON-CROP SITES

- Cutting of treated stems of brush before they are completely dead may result in sprouting.
- Do not use for the control of woody plants on lawns, walks, driveways, tennis courts or similar areas.
- Drift or spray mist contact with desirable trees, shrubs, or other plants may result in injury.
- Not registered for sale or use in California or Arizona.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store below 10°F. Store product in original container only. Store in a cool, dry place.

PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Refer to the Net Contents section of this product's labeling for the applicable "Nonrefillable Container" or "Refillable Container" designation.

Nonrefillable Rigid Plastic and Metal Containers (Capacity Equal to or Less Than 5 Gallons):
Nonrefillable container. Do not reuse or refill this container. Triple 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. Then, for Plastic Containers, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances. For Metal Containers, offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Nonrefillable Rigid Plastic and Metal Containers (Capacity Greater Than 5 Gallons):
Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then, for Plastic Containers, offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

For Metal Containers, offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Nonrefillable Rigid Plastic and Metal Containers, e.g., Intermediate Bulk Containers (IBC) [Size or Shape Too Large to be Tipped, Rolled or Turned Upside Down]:
Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying the contents from this container into application equipment or mix tank and before final disposal using the following pressure rinsing procedure. Insert a lance fitted with a suitable tank cleaning nozzle into the container and ensure that the water spray thoroughly covers the top, bottom and all sides inside the container. The nozzle manufacturer generally provides instructions for the appropriate spray pressure, spray duration and/or spray volume. If the manufacturer's instructions are not available, pressure rinse the container for at least 60 seconds using a minimum pressure of 30 PSI with a minimum rinse volume of 10% of the container volume. Drain, pour or pump rinsate into application equipment or rinsate collection system. Repeat this pressure rinsing procedure two more times. Then, for Plastic Containers, offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration. For Metal Containers, offer for recycling, if available, or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

All Refillable Containers:
Refillable container.
Refilling Container: Refill this container with KRENITE® S containing ammonium salt of fosamine only. Do not reuse this container for any other purpose. Cleaning before refilling is the responsibility of the refiller. Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn out threads and closure devices. If damage is found, do not use container, contact Albaugh, Inc. at the number below for instructions. Check for leaks after refilling and before transporting. If leaks are found, do not reuse or transport container; contact Albaugh, Inc. at the number below for instructions.

Disposing of Container: Do not reuse this container for any other purpose other than refilling (see proceeding). Cleaning the container before final disposal is the responsibility of the person disposing of the container. To clean the container before final disposal, use the following pressure rinsing procedure. Insert a lance fitted with a suitable tank cleaning nozzle into the container and ensure that the water spray thoroughly covers the top, bottom and all sides inside the container. The nozzle manufacturer generally provides instructions for the appropriate spray pressure, spray duration and/or spray volume. If the manufacturer's instructions are not available, pressure rinse the container for at least 60 seconds using a minimum pressure of 30 PSI with a minimum rinse volume of 10% of the container volume. Drain, pour or pump rinsate into application equipment or rinsate collection system. Repeat this pressure rinsing procedure two more times. Then, for Plastic Containers, offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances. For Metal Containers, offer for recycling, if available, or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Do not transport if container is damaged or leaking. If the container is damaged, leaking or obsolete, or in the event of a major spill, fire or other emergency, contact Albaugh, Inc. at 1-800-424-9300, day or night.

NOTICE TO BUYER: Purchase of this material does not confer any rights under patents of countries outside of the United States.

LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read This 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.

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 fanning techniques, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Albaugh, Inc. These risks can cause: ineffectiveness of the product; crop injury, or; injury to non-target crops or plants.

Albaugh, Inc. does not agree to be an insurer of these risks. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.**

Albaugh, Inc. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.

ALBAUGH, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

TO THE FULLEST EXTENT PERMITTED BY LAW, IN NO EVENT SHALL ALBAUGH, INC. OR SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BUYER'S OR USER'S BARGAINED-FOR EXPECTATION IS CROP PROTECTION. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER AND THE EXCLUSIVE LIABILITY OF ALBAUGH, INC. OR SELLER, FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY OR CONTRACT, NEGLIGENCE, TORT OR STRICT LIABILITY), WHETHER FROM FAILURE TO PERFORM OR INJURY TO CROPS OR OTHER PLANTS, AND 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 ALBAUGH, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Albaugh, Inc. or its Ag Retailer must have prompt notice of any claim so that an immediate inspection of buyer's or user's growing crops can be made. Buyer and all users shall promptly notify Albaugh, Inc. or an Albaugh, Inc. Ag Retailer of any claims, whether based on contract, negligence, strict liability, other tort or otherwise or be barred from any remedy.

This Limitation of Warranty and Liability may not be amended by any oral or written agreement.

KRENITE® and AgriStar® are registered trademarks of Albaugh, Inc.
ESCORT® is a registered trademark of E.I. DuPont de Nemours and Company.

SECTION 1 - CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

COMPANY ADDRESS:
ALBAUGH, LLC
Ankeny, IA 50021

EMERGENCY TELEPHONE NUMBERS:
(800) 424-9300 (CHEMTREC, transportation and spills)

PRODUCT NAME : **KRENITE S**
CHEMICAL NAME : Ammonium salt of Fosamine
PRODUCT USE : Herbicide
PRODUCT CODE : EPA Reg. No 42750-247

SECTION 2 - HAZARDS IDENTIFICATION SUMMARY

(As defined by OSHA Hazard Communication Standard, 29 CFR 1910.1200)

Colorless liquid

HEALTH HAZARDS: Causes moderate to severe eye irritation.

PHYSICAL HAZARDS: May release toxic gasses when burned

ENVIRONMENTAL HAZARDS: May be toxic to non-target plants

SECTION 3 - COMPOSITION, INFORMATION OF INGREDIENTS

COMPONENT	PERCENTAGE	CAS NUMBER
Ammonium Salt of Fosamine	41.5 %	25954-13-6
Inert Ingredients	58.5 %	n/a

SECTION 4 - FIRST AID MEASURES

First Aid responders should use protective equipment in Section 8 if there is a potential for exposure to product.

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

NOTE TO PHYSICIAN: No known antidote, treat symptomatically

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

SECTION 5 - FIRE FIGHTING MEASURES

National Fire Protection Rating (NFPA)

HEALTH	1
FLAMMABILITY	0
REACTIVITY	0
4=Severe 3=Serious 2=Moderate 1=Slight 0=Minimal	

FLASHPOINT: N/A

EXTINGUISHING MEDIA: Use water spray, foam or dry chemical.

FIRE AND EXPLOSION HAZARD: May decompose in fire due releasing irritating or toxic gases.

FIRE FIGHTING INSTRUCTIONS: Evacuate area and fight fire upwind from a safe distance to avoid hazardous vapors and decomposition products. Foam or dry chemical extinguishing systems recommended to prevent environmental damage due to water runoff.

Minimize use of water to prevent environmental contamination. Contact your State Pesticide or Environmental Control Agency, or nearest EPA Regional Office for guidance on disposal.

FIRE FIGHTING EQUIPMENT: Self-contained breathing apparatus with full facepiece. Full firefighting turn-out gear (Bunker gear).

SECTION 6 - ACCIDENTAL RELEASE MEASURES

IN CASE OF SPILLS OR LEAKS: Clean up spills immediately, observing precautions in Section 8 of this document. Isolate hazard area. Keep unnecessary and unprotected personnel from entering.

SMALL SPILL: Absorb small spills on sand, vermiculite or other inert absorbent. Place contaminated material in appropriate container for disposal.

LARGE SPILL: Dike large spills using absorbent or impervious material such as clay or sand. Recover and contain as much free liquid as possible for reuse. Allow absorbed material to solidify, and scrape up for disposal. After removal, scrub the area with detergent and water and neutralize with dilute alkaline solutions of soda ash, or lime. Minimize use of water to prevent environmental contamination

SECTION 7 - HANDLING AND STORAGE

KEEP OUT OF REACH OF CHILDREN!

Wear proper safety equipment specified in Section 8 when mixing, loading or otherwise handling concentrate.

HANDLING: Use only in a well-ventilated area. Wear appropriate safety equipment when handling.

STORAGE: Keep away from food, feed and drinking water. Do not store below 10°F. Store product in original container only. Store in a cool, dry place.

SECTION 8 - EXPOSURE CONTROLS, PERSONAL PROTECTION

EXPOSURE LIMITS (8 hour TWA, ppm):

COMPONENT	OSHA PEL	ACIGH TLV
Ammonium Salt of Fosamine	Not listed	Not listed

ENGINEERING CONTROLS: Proper ventilation is required when handling or using this product to minimize exposure to airborne contaminants. Local mechanical exhaust ventilation may be required. Facilities storing or utilizing this material should be equipped with an eyewash facility and a safety shower.

PERSONAL PROTECTIVE EQUIPMENT:
EYE PROTECTION - Safety glasses or goggles when mixing, loading or cleaning equipment is recommended.
CLOTHING – Long-sleeved shirt and long pants. Shoes plus socks,
GLOVES – Waterproof gloves when mixing, loading or cleaning equipment is recommended.

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

USER SAFETY RECOMMENDATIONS:
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. Remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible wash thoroughly and change into clean clothing.

SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	Colorless liquid
Odor:	Irritating odor
pH:	5.2 – 6.2
Melting Point:	Not applicable
Boiling Point:	No data
Flash Point:	Not applicable
Evaporation Rate:	No data
Flammability:	Not flammable
Flammability Limits:	Not applicable
Vapor Pressure:	0.53 mPa (25°C) (Fosamine ammonium)
Vapor Density:	Not applicable
Density:	1.15 – 1.19 g/ml (9.60 – 9.93 lb/gl)*
Solubility:	Emulsifies
Partition Coefficient:	log Pow = -2.9 (25°C) (Fosamine ammonium)
Auto-Ignition Temperature:	No data
Decomposition Temperature:	No data
Viscosity:	6.0 mPa (20°C); 2.8 mPa (40°C)

*Listed density is an approximate value and does not necessarily represent that of a specific batch.

SECTION 10 - STABILITY AND REACTIVITY

PRODUCT REACTIVITY: None known.

CHEMICAL STABILITY: Stable, however may decompose if heated.

HAZARDOUS REACTION/POLYMERIZATION: Product will not undergo polymerization.

CONDITIONS TO AVOID: Avoid temperatures above (115°F, 46°C) and below 25°F (-5°C).

INCOMPATIBLE MATERIALS: Strong oxidizers or bases, mild and galvanized steel.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide, Nitrogen oxides, phosphorous oxides.

SECTION 11 - TOXICOLOGICAL INFORMATION

ACUTE TOXICITY:

Oral LD_{50} (rat)	- > 5,000 mg/kg
Dermal LD_{50} (rat)	- > 2,000 mg/kg
Inhalation LC_{50} (rat)	- > 4.1 mg/L
Eye Irritation (rabbit)	- Slight
Skin Irritation (rabbit)	- Slight
Sensitization (guinea pig)	- Non-sensitizer

CARCINOGEN STATUS:

OSHA	- Not listed
NTP	- Not listed
IARC	- Not listed

TERATOGENICITY: No evidence of reproductive or developmental toxicity.

MUTAGENICITY: No evidence of mutagenic effects during in vivo or in vitro studies.

SECTION 12 - ECOLOGICAL INFORMATION

ENVIRONMENTAL SUMMARY: 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 by cleaning of equipment or disposal of equipment washwaters.

FATE: Fosamine is slightly persistent with a soil half life of 1 - 2 weeks. It is moderately mobile depending on soil type.

FISH TOXICITY: (Fosamine ammonium)

96 hour LC_{50}, Rainbow trout –	330 mg/L
96 hour LC_{50}, Bluegill –	590 mg/L

AVIAN TOXICITY: (Fosamine ammonium)

Oral LD_{50}, Bobwhite quail –	> 5,000 mg/Kg
Oral LD_{50}, Mallard duck –	> 5,000 mg/Kg

BEE: (Fosamine ammonium) > 100 ug/Bee

SECTION 13 - DISPOSAL CONSIDERATIONS

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

WASTE: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER: Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

Refillable container. Refill this container with KRENITE S containing ammonium salt of fosamine only. Do not reuse this container for any other purpose. Cleaning before refilling is the responsibility of the refiller.

Refer to the product label for additional and complete Container Handling instructions

SECTION 14 - TRANSPORT INFORMATION

SHIPPING DESCRIPTION: (Ground transport)	Not regulated by DOT
TRANSPORT HAZARD CLASS:	N/A
UN NUMBER:	N/A
DOT PACKING GROUP:	PG III

SECTION 15 - REGULATORY INFORMATION

CERCLA REPORTABLE QUANTITY:	Not listed
SARA TITLE III STATUS:	
311/312 Hazard Categories –	Immediate Health
313 Toxic Chemicals –	None known
CALIFORNIA PROP 65:	Not listed
TSCA:	This product is exempted from TSCA because it is solely for FIFRA regulated use.

SECTION 16 - OTHER INFORMATION

HMIS HAZARD RATINGS	HEALTH	1
	FLAMMABILITY	1
	PHYSICAL HAZARD	0
	4=Severe 3=Serious 2=Moderate 1=Slight 0=Minimal	

DISCLAIMER: The information presented herein is based on available data from reliable sources and is correct to the best of Albaugh's knowledge. Albaugh makes no warranty, express or implied, regarding the accuracy of the data or the results obtained from the use of this product. Nothing herein may be construed as recommending any practice or any product in violation of any law or regulations. The user is solely responsible for determining the suitability of any material or product for a specific purpose and for adopting any appropriate safety precautions.

This Safety Data Sheet (SDS) serves different purposes than and DOES NOT REPLACE OR MODIFY THE EPA APPROVED PRODUCT LABELING (attached to and accompanying the product container). This SDS provides important health, safety, and environmental information for employers, employees, emergency responders and others handling large quantities of the product in activities generally other than product use, while the labeling provides that information specifically for product use in the ordinary course. Use, storage and disposal of pesticide products are regulated by the EPA under the authority of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) through the product labeling, and all necessary and appropriate precautionary, use, storage, and disposal information is set forth on that labeling.

It is a violation of federal law to use a pesticide product in any manner not prescribed on the EPA-approved label.

REVISED DATE: December, 2014

REFERENCE: Revised for GHS compliance

ARSENAL®

SPECIMEN

herbicide

For control of undesirable vegetation growing within specified aquatic sites, forestry sites, pasture/rangeland, and nonagricultural lands; and for establishment and maintenance of wildlife openings, release of unimproved Bermudagrass and Bahiagrass, bareground weed control, and for use under certain paved surfaces

Active Ingredient:

isopropylamine salt of imazapyr: (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3-pyridinecarboxylic acid)*	27.8%
Other Ingredients:	72.2%
Total:	100.0%

* Equivalent to 22.6% 2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3-pyridinecarboxylic acid or 2 pounds acid per gallon

EPA Reg. No. 241-346 **EPA Est. No.**

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCIÓN

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 inside for complete **First Aid**, **Precautionary Statements**, **Directions For Use**, **Conditions of Sale and Warranty**, and state-specific crop and/or use site restrictions.

In case of an emergency endangering life or property involving this product, call day or night 1-800-832-HELP (4357).

Net Contents:

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
The Chemical Company

FIRST AID	
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 by a poison control center or doctor. • **DO NOT** give anything by mouth to an unconscious person.
If in eyes	• Hold eyes open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after first 5 minutes; then continue rinsing eyes. • 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 to 20 minutes. • Call a poison control center or doctor for treatment advice.
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.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact BASF Corporation for emergency medical treatment information: 1-800-832-HELP (4357).	

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed. Avoid contact with eyes or clothing.

Personal Protective Equipment (PPE)

Some materials that are chemically resistant to this product are listed below. 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:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

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

Engineering Controls

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands with plenty of soap and water 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.
- 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.

Physical and Chemical Hazards

Spray solutions of **Arsenal® herbicide** must be mixed, stored, and applied only in stainless steel, fiberglass, plastic, and plastic-lined steel containers.

Thoroughly clean application equipment, including landing gear, immediately after use of this product. Prolonged exposure of this product to uncoated steel (except stainless steel) surfaces may result in corrosion and failure of the exposed part. The maintenance of an organic coating (paint) may prevent corrosion.

Environmental Hazards

This product is toxic to plants. Drift and runoff may be hazardous to plants in water adjacent to treated areas. **DO NOT** apply to water except as specified in this label. Treatment of aquatic weeds may result in oxygen depletion or loss because of decomposition of dead plants. This oxygen loss may cause suffocation of some aquatic organisms. **DO NOT** treat more than 1/2 of the surface area of the water in a single operation and wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outward in bands to allow aquatic organisms to move into untreated areas. **DO NOT** contaminate water when disposing of equipment washwater or rinsate.

This pesticide is toxic to vascular plants and must be used strictly in accordance with the drift precautions on the label.

Directions For Use

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

Arsenal® herbicide must be used only in accordance with the instructions on the label attached to the container. Keep containers closed to avoid spills and contamination.

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.

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 **48 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
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material
- Protective eyewear

NONAGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard (WPS) 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.

DO NOT enter or allow others to enter treated areas until sprays have dried.

STORAGE AND DISPOSAL

DO NOT contaminate water, food, or feed by storage or disposal.

Pesticide Storage

DO NOT store below 10° F.

Pesticide Disposal

Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility.

Container Handling

Nonrefillable Container. DO NOT reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity ≤ 5 gallons) 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.

Triple rinse containers too large to shake (capacity > 5 gallons) as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or 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.

Refillable Container. Refill this container with pesticide only. **DO NOT** reuse this container for any other purpose. Triple rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

(continued)

STORAGE AND DISPOSAL *(continued)*

Container Handling *(continued)*

Triple rinse as follows: To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

When this container is empty, replace the cap and seal all openings that have been opened during use; return the container to the point of purchase or to a designated location. This container must only be refilled with a pesticide product. Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn-out threads and closure devices. Check for leaks after refilling and before transport. **DO NOT** transport if this container is damaged or leaking. If the container is damaged, or leaking, or obsolete and not returned to the point of purchase or to a designated location, triple rinse emptied container and offer for recycling, if available, or dispose of container in compliance with state and local regulations.

In Case of Emergency

In case of large-scale spillage regarding this product, call:

- CHEMTREC 1-800-424-9300
- BASF Corporation 1-800-832-HELP (4357)

In case of medical emergency regarding this product, call:

- Your local doctor for immediate treatment
- Your local poison control center (hospital)
- BASF Corporation 1-800-832-HELP (4357)

Steps to be taken in case material is released or spilled:

- Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal.
- Remove contaminated clothing and wash affected skin areas with soap and water.
- Wash clothing before reuse.
- Keep the spill out of all sewers and open bodies of water.

Product Information

Arsenal® herbicide is an aqueous solution to be mixed with water and a surfactant and applied as a spray solution to control undesirable vegetation growing within specified aquatic sites, forestry sites, pasture/rangeland and nonagricultural lands. Aquatic sites consist of standing and flowing water, estuarine/marine, wetland, and riparian areas. Nonagricultural lands include private, public and military lands as follows: uncultivated nonagricultural areas (including airports, highway, railroad and utility rights-of-way, and sewage disposal areas); uncultivated agricultural areas - noncrop producing (including farmyards, fuel storage areas, fence rows, nonirrigation ditchbanks, and barrier strips); industrial sites - outdoor (including lumberyards, pipeline and tank farms); and natural areas (including wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads, and trails). **Arsenal** may also be used for the release of unimproved Bermudagrass and Bahiagrass, for bareground weed control, and for use under certain paved surfaces.

Herbicidal Activity

Arsenal will control most annual and perennial grass and broadleaf weeds in addition to many brush and vine species with some residual control of undesirable species that germinate above the waterline. **Arsenal** is readily absorbed through emergent leaves and stems and is translocated rapidly throughout the plant with accumulation in the meristematic regions. For maximum activity, weeds should be growing vigorously at the time of application, and the spray solution should include a surfactant (see **Adjuvants** section for specific use directions). Treated plants stop growing soon after spray application. Chlorosis appears first in the newest leaves, and necrosis spreads from this point. In perennials, the herbicide is translocated into and kills underground or submerged storage organs, which prevents regrowth. Chlorosis and tissue necrosis may not be apparent in some plant species until 2 or more weeks after application. Complete kill of plants may not occur for several weeks. **Arsenal** applications are rainfast 1 hour after treatment.

Product Use and Restrictions

Applications may be made for control of undesirable vegetation growing within specified aquatic sites, forestry sites, pasture/rangeland and nonagricultural lands. Aquatic sites consist of standing and flowing water; estuarine/marine, wetland, and riparian areas; for control of most annual and perennial grass weeds, broadleaf weeds, vines and brambles, and hardwood brush and trees for forestry site preparation and release of conifers from woody and herbaceous competition. **Arsenal** may also be used for selective woody and herbaceous weed control in natural regeneration of certain conifers (see **Conifer Release Treatment**).

Nonagricultural lands include private, public and military lands as follows: uncultivated nonagricultural areas (including airports, highway, railroad and utility rights-of-way, and sewage disposal areas); uncultivated agricultural areas - noncrop producing (including farmyards, fuel storage areas, fence rows, nonirrigation ditchbanks, and barrier strips); industrial sites - outdoor (including lumberyards, pipeline and tank farms); and natural areas (including wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads, and trails).

Restrictions and Limitations

- **DO NOT** use on food crops.
- **DO NOT** apply this product within 1/2 mile upstream of an active potable water intake in flowing water (i.e. river, stream, etc.) or within 1/2 mile of an active potable water intake in a standing body of water, such as a lake, pond, or reservoir.
- **DO NOT** apply to water used for irrigation except as described in **Product Use and Restrictions** section of this label.
- Keep from contact with fertilizers, insecticides, fungicides, and seeds.
- **DO NOT** drain or flush equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the treated soil may be washed or moved into contact with their roots.
- **DO NOT** use on lawns, walks, driveways, tennis courts, or similar areas.
- **DO NOT** side trim desirable vegetation with this product unless severe injury and plant death can be tolerated. Prevent drift of spray to desirable plants.
- Clean application equipment after using this product by thoroughly flushing with water.

Nonagricultural Lands and Forestry Sites

- **DO NOT** apply more than 1.5 lbs acid equivalent (ae) imazapyr (equivalent to 96 fl ozs of **Arsenal® herbicide**) per acre per year.

Pasture/Rangeland Sites

- For spot treatment only.
- **DO NOT** treat more than 1/10 of the available area to be grazed or cut for hay.
- **DO NOT** apply more than 0.75 lb ae imazapyr (equivalent to 48 fl ozs of **Arsenal**) per acre per year.

Aquatic Sites

- **DO NOT** apply more than 1.5 lbs ae imazapyr (equivalent to 96 fl ozs of **Arsenal**) per acre per year.
- **Public waters** - Application of **Arsenal** to water can only be made by federal or state agencies, such as Water Management District personnel, municipal officials, and the U.S. Army Corps of Engineers, or those applicators who are licensed or certified as aquatic pest control applicators and are authorized by the state or local government. Treatment to other than non-native invasive species is limited to only those plants that have been determined to be a nuisance by a federal or state government entity.
- **Permitting** - Consult local state fish and game agency and water control authorities before applying this product to public water. Permits may be required to treat such water.
- **Private waters** - Applications may be made to private waters that are still, such as ponds, lakes, and drainage ditches where there is minimal or no outflow to public waters.
- **Aerial application** - Aerial application to aquatic sites is restricted to helicopter only.
- **Irrigation water** - Application to water used for irrigation that results in **Arsenal** residue greater than 1.0 ppb **MUST NOT** be used for irrigation purposes for 120 days after application or until **Arsenal** residue levels are determined by laboratory analysis or other appropriate means of analysis to be 1.0 ppb or less. When applications are made within 500 feet of an active irrigation intake, **DO NOT** irrigate for at least 24 hours following application to allow for dissipation.

Recreational Use of Water in Treatment Area

There are no restrictions on the use of water in the treatment area for recreational purposes, including swimming and fishing.

Livestock Use of Water in/from Treatment Area

There are no restrictions on livestock consumption of water from the treatment area.

Restrictions for Potable Water Intakes

DO NOT apply **Arsenal** directly to water within 1/2 mile upstream of an active potable water intake in flowing water (i.e. river, stream, etc.) or within 1/2 mile of an active potable water intake in a standing body of water such as a lake, pond, or reservoir. To make aquatic applications around and within 1/2 mile of active potable water intakes, the water intake must be turned off during application and for a minimum of 48 hours after application. These aquatic applications may be made only in cases where there are alternative water sources or holding ponds that would permit turning off an active potable water intake for a minimum period of 48 hours after applications.

NOTE: Existing potable water intakes that are no longer in use, such as those replaced by connections to wells or a municipal water system, are not considered to be active potable water intakes. This restriction does not apply to intermittent, inadvertent overspray of water in terrestrial use sites.

Quiescent or Slow-moving Waters

In lakes and reservoirs, **DO NOT** apply **Arsenal** within 1 mile of an active irrigation water intake during the irrigation season. Applications less than 1 mile from an active irrigation water intake may be made during the off-season if the irrigation intake will remain inactive for a minimum of 120 days after application or until **Arsenal** residue levels are determined by laboratory analysis or other appropriate means of analysis to be 1.0 ppb or less.

Precautions for Avoiding Injury to Nontarget Plants

Untreated desirable plants can be affected by root uptake of **Arsenal® herbicide** from treated soil. Injury or loss of desirable plants may result if **Arsenal** is applied on or near desirable plants, on areas where their roots extend, or in locations where the treated soil may be washed or moved into contact with their roots. When making application along shorelines where desirable plants may be present, use caution to avoid spray contact with their foliage or spray application to the soil in which they are rooted. Shoreline plants that have roots which extend into the water in an area where **Arsenal** has been applied generally will not be adversely affected by uptake of the herbicide from the water.

If treated vegetation is to be removed from the application site, **DO NOT** use the vegetative matter as mulch or compost on or around desirable species.

Managing Off-target Movement

Aerial Application

- Applicators are required to use a coarse or coarser droplet size (ASABE S572) or, if specifically using a spinning atomizer nozzle, applicators are required to use a volume mean diameter (VMD) of 385 microns or greater for release heights below 10 feet. Applicators are required to use a very coarse or coarser droplet size or, if specifically using a spinning atomizer nozzle, applicators are required to use a VMD of 475 microns or greater for release heights above 10 feet. Applicators must consider the effects of nozzle orientation and flight speed when determining droplet size.
- Applicators are required to use upwind swath displacement.
- The boom length must not exceed 60% of the wingspan or 90% of the rotor-blade diameter to reduce spray drift.
- Applications with wind speeds less than 3 mph and with wind speeds greater than 10 mph are prohibited.
- Applications into temperature inversions are prohibited.

Ground Boom Application

- Applicators are required to use a nozzle height below 4 feet above the ground or plant canopy and coarse or coarser droplet size (ASABE S572) or, if specifically using a spinning atomizer nozzle, applicators are required to use a volume mean diameter (VMD) of 385 microns or greater.
- Applications with wind speeds greater than 10 mph are prohibited.
- Applications into temperature inversions are prohibited.

Wind Erosion

Avoid treating powdery, dry, or light sandy soils when conditions are favorable for wind erosion. Under these conditions, the soil surface should first be settled by rainfall or irrigation.

Adjuvants

Postemergence applications of **Arsenal** require the addition of a spray adjuvant. When making aquatic applications, only spray adjuvants approved or appropriate for aquatic use must be used.

Nonionic Surfactant

Use a nonionic surfactant (NIS) at the rate of 0.25% volume/volume (v/v) or higher (see manufacturer's label) of the spray solution (0.25% v/v is equivalent to 1 quart in 100 gallons). For best results, select a nonionic surfactant with a hydrophilic-to-lipophilic balance (HLB) ratio between 12 and 17 with at least 70% surfactant in the formulated product. Alcohol, fatty acid, oil, ethylene glycol, or diethylene glycol should not be considered as surfactants to meet the above requirements.

Methylated Seed Oil or Vegetable Oil Concentrate

Instead of a surfactant, a methylated seed oil (MSO) or vegetable-based seed oil concentrate may be used at the rate of 1.5 to 2 pints per acre. When using spray volumes greater than 30 gallons per acre, mix MSO or vegetable-based seed oil concentrates at a rate of 1% of total spray volume, or alternatively use a nonionic surfactant as described above. Research indicates that these oils may aid in **Arsenal** deposition and uptake by plants under moisture or temperature stress.

Silicone-based Surfactant

See manufacturer's label for specific rates. Silicone-based surfactants may reduce the surface tension of the spray droplet allowing greater spreading on the leaf surface as compared to conventional nonionic surfactants. However, some silicone-based surfactants may dry too quickly, limiting herbicide uptake.

Invert Emulsions

Arsenal can be applied as an invert emulsion. The spray solution results in an invert (water-in-oil) spray emulsion designed to minimize spray drift and spray runoff, resulting in more herbicide on the target foliage. The spray emulsion may be formed in a single tank (batch mixing) or injected (in-line mixing). Consult the invert chemical label for proper mixing directions.

Other

An antifoaming agent, spray pattern indicator, or drift-reducing agent may be applied at the product labeled rate if necessary or desired.

Tank Mixes

Arsenal may be tank mixed with other herbicides.

Consult manufacturer's labels for specific rate restrictions and weeds controlled. Always follow the more restrictive label restrictions and precautions for all products used when making an application involving tank mixes.

Application Methods

Arsenal® herbicide may be selectively applied using low-volume directed application techniques or may be broadcast-applied using ground equipment, watercraft, or aircraft. Aerial applications to aquatic sites must be made by helicopter. In addition, **Arsenal** may also be applied using cut-stump, cut-stem, and frill or girdle treatment techniques within nonagricultural lands, pasture/rangeland, and aquatic sites; see **Aerial Application** and **Ground Application** sections for additional details.

Aerial Application

All precautions must be taken to minimize or eliminate spray drift. Both fixed-wing aircraft and helicopters can be used to apply **Arsenal** on nonagricultural lands, but only helicopters can be used for aquatic applications. **DO NOT** make applications by fixed-wing aircraft or helicopter unless appropriate buffer zones can be maintained to prevent spray drift out of the target area; or when treating open tracts of land, spray drift as a result of fixed-wing aircraft application can be tolerated. Aerial equipment designed to minimize spray drift, such as a helicopter equipped with a **Microfoil™ boom**, **Thru-Valve™ boom**, or raindrop nozzles, must be used and calibrated. Except when applying with a **Microfoil boom**, a drift control agent may be added at the specified label rate. **DO NOT** side trim with **Arsenal** unless death of treated tree can be tolerated.

Uniformly apply the specified amount of **Arsenal** in 2 to 30 gallons of water per acre. A foam-reducing agent may be added at the specified label rate, if needed.

Thoroughly clean application equipment, including landing gear, immediately after use of this product. Prolonged exposure of this product to uncoated steel (except stainless steel) surfaces may result in corrosion and failure of the exposed part. The maintenance of an organic coating (paint) may prevent corrosion.

Ground Application

Foliar Application

Low-volume Foliar Application

Use equipment calibrated to deliver 5 to 20 gallons of spray solution per acre. To prepare the spray solution, thoroughly mix in water 0.5% to 5% **Arsenal** plus surfactant; see the **Adjuvants** section of this label for specific use directions. A foam-reducing agent may be applied at the specified label rate, if needed. For difficult-to-control species (see **Aquatic Weed Control** and **Terrestrial Weed Control** sections for relative susceptibility of weed species), use the higher concentrations of herbicide and/or spray volumes, but **DO NOT** apply more than 3 quarts of **Arsenal** per acre in aquatic sites and nonagricultural lands and 1.5 quarts per acre in pasture/rangeland. Excessive wetting of foliage is not necessary.

For low-volume foliar application, select proper nozzles to avoid overapplication. Proper application is critical to ensure desirable results. Best results are achieved when spray covers the crown and approximately 70 percent of the plant. The use of an even, flat-fan tip with a spray angle of 40 degrees or less will aid in proper deposition.

Appropriate tip sizes include 4004E or 1504E. For a straight-stream and cone pattern, adjustable cone nozzles, such as 5500 X3 or 5500 X4, may be used. Attaching a rollover valve onto a Spraying Systems Model 30 gunjet or other similar spray gun allows for the use of both flat-fan and cone tips on the same gun.

Moisten, but **DO NOT** drench target vegetation causing spray solution to run off.

Low-volume Foliar Application with Backpack. For low-growing species, spray down on the crown, covering crown and penetrating approximately 70% of the plant.

For target species 4 to 8 feet tall, swipe the sides of target vegetation by directing spray to at least 2 sides of the plant in smooth vertical motions from the crown to the bottom. Make sure to cover the crown whenever possible.

For target species over 8 feet tall, lace sides of target vegetation by directing spray to at least 2 sides of the target in smooth zigzag motions from crown to bottom.

Low-volume Foliar Application with Hydraulic Handgun Application Equipment. Use the same technique as described for **Low-volume Foliar Application with Backpack**.

For broadcast application, simulate a gentle rain near the top of target vegetation allowing spray to contact the crown and penetrate the target foliage without falling to the understory. Herbicide spray solution that contacts the understory may result in severe injury or death of plants in the understory.

High-volume Foliar Application

For optimum performance when spraying medium-density to high-density vegetation, use equipment calibrated to deliver up to 100 gallons of spray solution per acre (GPA). Spray solutions exceeding 100 GPA may result in excessive spray runoff, causing increased ground cover injury and injury to desirable species.

To prepare the spray solution, thoroughly mix **Arsenal** in water and add a surfactant; see **Adjuvants** section for specific use directions and rates for surfactants. A foam-reducing agent may be added at the specified label rate, if needed. For difficult-to-control species (see **Aquatic Weed Control** and **Terrestrial Weed Control** sections for relative susceptibility of weed species), use the higher concentrations of herbicide and/or spray volumes, but **DO NOT** apply more than 3 quarts of **Arsenal** per acre in aquatic sites and nonagricultural lands and 1.5 quarts per acre in pasture/rangeland. Uniformly cover the foliage of the vegetation to be controlled, but **DO NOT** apply to runoff. Excessive wetting of foliage is not necessary.

Side Trimming

DO NOT side trim with **Arsenal® herbicide** unless severe injury or death of the treated tree can be tolerated. **Arsenal** is readily translocated and can result in death of the entire tree.

Cut-surface Treatment

Arsenal may be used to control undesirable woody vegetation by applying the **Arsenal** solution to the cambium area of freshly cut stump surfaces or to fresh cuts on the stem of target woody vegetation. Application can be made any time of the year except during periods of heavy sap flow in the spring. **DO NOT** overapply solution causing runoff from the cut surface.

Injury may occur to desirable woody plants if shoots extend from the same root system or their root systems are grafted to those of the treated tree.

Cut-surface Application with Dilute and Concentrate Solutions

Arsenal may be mixed as either a concentrate or dilute solution. The dilute solution may be used for application to the cut surface of the stump or to cuts on the stem of target woody vegetation. Concentrate solutions may be used for application to cuts on the stem. Use of the concentrate solution permits application to fewer cuts on the stem, especially for large-diameter trees. Follow application instructions for proper application techniques for each type of solution.

- To prepare a dilute solution, mix 8 to 12 fluid ounces of **Arsenal** with 1 gallon of water. A surfactant or penetrating agent may improve uptake through partially callused cambiums.
- To prepare a concentrate solution, mix 2 quarts of **Arsenal** with no more than 1 quart of water.

Cut-stump Treatment

Dilute Solution. Spray or brush the solution onto the cambium area of the freshly cut stump surface. Ensure that the solution thoroughly wets the entire cambium area (the wood next to the bark of the stump).

Cut-stem Treatment (injection, hack-and-squirt)

Dilute Solution. Using standard injection equipment, apply 1 milliliter (mL) of solution at each injection site around the tree with no more than 1-inch intervals between cut edges. Ensure that the injector completely penetrates the bark at each injection site.

Concentrate Solution. Using standard injection equipment, apply 1 mL of solution at each injection site. Make at least 1 injection cut for every 3 inches of diameter at breast height (DBH) on the target tree. For example, a 3-inch DBH tree will receive 1 injection cut, and a 6-inch DBH tree will receive 2 injection cuts. On trees requiring more than 1 injection site, place the injection cuts at approximately equal intervals around the tree.

Frill or Girdle Treatment

Using a hatchet, machete, or chainsaw, make cuts through the bark and completely around the tree to expose the cambium. The cut should angle downward extending into the cambium enough to expose at least 2 growth rings. Using a spray applicator or brush, apply a 25% to 100% solution of **Arsenal** into each cut until thoroughly wet. Avoid applying so much herbicide that runoff to the ground or water occurs.

Forestry Use

Site Preparation Treatment

Arsenal may be used to control labeled grass weeds, broadleaf weeds, vines and brambles, and woody brush and trees on forest sites in advance of regeneration for the following conifer crop species:

Common Name	**Scientific Name**	**Rate** (fl ozs/A)
Loblolly pine	*Pinus taeda*	48 to 80
Loblolly X pitch hybrid		
Longleaf pine	*Pinus palustris*	
Shortleaf pine	*Pinus echinata*	
Virginia pine	*Pinus virginiana*	
Slash pine	*Pinus elliottii*	40 to 64
Coastal redwood	*Sequoia sempervirens*	24 to 48
Douglas fir	*Pseudotsuga menziesii*	
Western hemlock	*Tsuga heterophylla*	
California red fir	*Abies magnifica*	24 to 40
California white fir	*Abies concolor*	
Jack pine	*Pinus banksiana*	24 to 32
Lodgepole pine	*Pinus contorta*	
Pitch pine	*Pinus rigida*	
Ponderosa pine	*Pinus ponderosa*	
Sugar pine	*Pinus lambertiana*	
White pine	*Pinus strobus*	
Black spruce	*Picea mariana*	
Red spruce	*Picea rubens*	
White spruce	*Picea glauca*	

Use the label rate of **Arsenal** per acre applied as a broadcast foliar spray for long-term control of labeled woody plants and residual control of herbaceous weeds. Within 4 to 6 weeks of treatment, grass and other herbaceous weeds will be controlled and may provide fuel to facilitate a site preparation burn, if desired, to control conifers or other species tolerant to the herbicide.

Apply the label rate of **Arsenal** per acre in 5 to 30 gallons total spray solution for helicopter applications or 5 to 100 gallons total spray solution for mechanical ground spray and backpack applications. Use a minimum of 0.5% by volume nonionic surfactant (NIS). Use the higher label rates of **Arsenal** and higher spray volumes when

controlling particularly dense or multilayered canopies of hardwood stands or difficult-to-control species.

In certain cases, tank mixes may be necessary for chemical control of conifers and other species tolerant to **Arsenal® herbicide**. Observe all precautions and restrictions on the product labels. Always follow the most restrictive label. Combinations with other products labeled for forest site preparation may kill certain plants such as legumes and blackberry, which are desirable for wildlife habitat.

Where quick initial brownout (deadening of foliage) is desired for burning, apply a tank mixture of 32 fl ozs to 64 fl ozs **Arsenal** with 16 fl ozs to 64 fl ozs glyphosate or 16 fl ozs to 48 fl ozs triclopyr ester per acre. For control of seedling pines, apply 32 fl ozs to 64 fl ozs **Arsenal** with 3 to 4 quarts glyphosate. For site preparation, rates less than 48 fl ozs **Arsenal** will provide suppression of hardwood brush and trees; some resprouting may occur.

DO NOT plant seedlings of black spruce (*Picea mariana*) or white spruce (*Picea glauca*) on sites broadcast-treated with **Arsenal** or into the treated zone of spot or banded applications for 3 months following application or injury may occur.

Herbaceous Weed Control

Use **Arsenal** for selective weeding in the following conifers:

Common Name	Scientific Name	Rate (fl ozs/A)
Loblolly pine	*Pinus taeda*	12 to 20
Loblolly X pitch hybrid		
Virginia pine	*Pinus virginiana*	
Longleaf pine[1]	*Pinus palustris*	8 to 12
Slash pine[1]	*Pinus elliottii*	
Douglas fir[1]	*Pseudotsuga menziesii*	

[1] Use of surfactant is not recommended.

Arsenal may be applied as a broadcast treatment, banded over tree rows, or as a directed spray for release of young conifers from herbaceous weeds. To prevent possibility of conifer injury, **DO NOT** apply **Arsenal** when conifers are under stress from drought, disease, animal or winter injury, planting shock, or other stresses reducing conifer vigor. Broadcast applications may be made by helicopter, ground, or backpack sprayer. For difficult-to-control weeds, use the higher labeled rates. Where herbaceous weeds have overtopped conifer seedlings, a nonionic surfactant may be added to improve weed control (except for slash pine, long-leaf pine, and Douglas fir), at a rate not to exceed 0.5% of spray solution volume. Some minor conifer growth inhibition may be observed when herbaceous weed control treatments are made during periods of active conifer growth.

Arsenal may also be applied using backpack or handheld sprayers to control herbaceous weeds around individual conifer seedlings. Mix 0.8 fl oz to 1.2 fl ozs **Arsenal** and 0.2 oz nonionic surfactant per gallon of water. Direct the spray to the weeds and minimize the amount applied to conifer foliage for best conifer tolerance. Ensure that maximum labeled rates per acre for previously listed crop species are not exceeded.

Arsenal may be tank mixed with sulfometuron to broaden the spectrum of weeds controlled. For loblolly pine, apply 8 fl ozs to 12 fl ozs **Arsenal** plus 1 oz to 2 ozs sulfometuron per acre. The application of **Arsenal** plus sulfometuron on other conifer species may cause growth suppression.

Conifer Release Treatment

Arsenal may be applied as a broadcast or directed spray application for suppression of labeled brush, tree, and herbaceous weed species. Directed spray applications may be made with low-volume applications in conifer stands of all ages by targeting the unwanted vegetation and avoiding direct application to the conifer. Ensure that maximum labeled rates per acre listed for the following crop species are not exceeded.

Broadcast Applications for release of the following conifers from hardwood competition:

Common Name	Scientific Name	Rate (fl ozs/A)
Loblolly pine[3]	*Pinus taeda*	24 to 40
Loblolly X pitch hybrid[3]		
Virginia pine[3]	*Pinus virginiana*	
Longleaf pine	*Pinus palustris*	24 to 32
Pitch pine	*Pinus rigida*	
Shortleaf pine	*Pinus echinata*	
Slash pine	*Pinus elliottii*	
White pine[1]	*Pinus strobus*	16 to 32
California red fir	*Abies magnifica*	16 to 24
California white fir	*Abies concolor*	
Lodgepole pine[2]	*Pinus contorta*	
Douglas fir[2]	*Pseudotsuga menziesii*	
Jack pine[2]	*Pinus banksiana*	12 to 24
Black spruce[2]	*Picea mariana*	
Red spruce[2]	*Picea rubens*	
White spruce[2]	*Picea glauca*	

[1] **DO NOT** make applications to white pine stands younger than three years old. To minimize potential white pine injury, release treatments should not be made prior to July 15.

[2] Applications should be made after formation of final conifer resting buds in the fall or height growth inhibition may occur.

[3] **Mid-rotation release:** For broadcast applications below the pine canopy in established stands of loblolly pine, loblolly X pitch hybrid, and Virginia pine, use 32 fl ozs to 64 fl ozs product per acre. For mid-rotation release of other species, use rates listed in chart above.

For slash pine and longleaf pine, broadcast release treatments over the top of pines for the purpose of woody plant control must be made after August 15 and only in stands 2 through 5 years old. For applications over the top of slash pine and longleaf pine, DO NOT add surfactant and use lower labeled rates on sandy soils.

Apply the label rate of **Arsenal® herbicide** per acre when making broadcast applications with helicopter or ground spray equipment. Refer to mixing and application instructions for proper spray volumes. A nonionic surfactant may be added at no more than 0.25% by volume.

Use the higher label rates of **Arsenal** when controlling particularly dense stands or difficult-to-control species.

Some minor conifer growth inhibition may be observed when release treatments are made during periods of active conifer growth. To minimize potential conifer height growth inhibition, **DO NOT** make broadcast applications to conifer stands except loblolly pine before the end of the second growing season. To minimize potential conifer height growth inhibition, broadcast release treatments may be made late in the growing season. To prevent possibility of conifer injury, **DO NOT** apply **Arsenal** when conifers are under stress from drought, disease, animal or winter injury, or other stresses reducing conifer vigor.

Arsenal may be used to release loblolly pine seedlings during the first growing season following planting or for one-year-old natural loblolly pine regeneration. For one-year-old loblolly pine release, apply 24 fl ozs to 40 fl ozs per acre of **Arsenal** after July 15. Rates below 32 fl ozs per acre are intended for hardwood growth suppression; expect hardwood resprouting.

Spot Treatment of Undesirable Hardwood Vegetation

Arsenal may be used as a directed foliar or cut-stem application to control undesirable brush and hardwoods in the management of stands of all ages for the conifer species listed in the broadcast application section above. Refer to mixing and application instructions in the directed foliar or cut-stem sections above for proper use rates, equipment, and application techniques. **DO NOT** exceed maximum labeled rates per acre listed for crop species. Cut-stem applications may be used for spot treatment of undesirable hardwoods in Ponderosa pine stands using 24 fl ozs or less of **Arsenal** per acre.

Avoid direct application to desired plant species or injury may occur. Injury may occur to nontarget or desirable hardwoods or conifers if they extend from the same root system, or their root systems are grafted to those of the treated tree, or their roots extend into the treated zone.

Late Rotation Vegetation Control in Western Conifer

In California, the Pacific Northwest and Inland Northwest, broadcast aerial applications of **Arsenal** up to 48 fl ozs per acre are permissible in conifer stands that are targeted for harvesting the year following treatment. Use minimum spray volume of 15 gallons per acre. Significant conifer injury or mortality must be expected. **DO NOT** use this treatment if conifer injury or mortality cannot be tolerated.

Bag and Spray Application for Conifer Release

In Douglas fir and Ponderosa pine stands, broadcast applications of **Arsenal** up to 32 fl ozs per acre are permissible when the trees are covered by bags prior to the application. The bags must prevent the spray mix from contacting the conifer foliage. On sites with coarse textured soils (e.g. decomposed granite, pumice, sandy or rocky sites) or low levels of soil organic matter (generally 5% or less), significant conifer growth inhibition and mortality is possible. **DO NOT** use this treatment on these types of sites if conifer growth inhibition and mortality cannot be tolerated.

Nonagricultural Land Use

Arsenal may be used for woody and herbaceous weed control in nonagricultural lands including private, public and military lands as follows: uncultivated nonagricultural areas (including airports, highway, railroad and utility rights-of-way, and sewage disposal areas); uncultivated agricultural areas - noncrop producing (including farmyards, fuel storage areas, fence rows, nonirrigation ditchbanks, and barrier strips); industrial sites - outdoor (including lumberyards, pipeline and tank farms); and natural areas (including wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads, and trails).

Applications to nonagricultural lands are not applicable to treatment of commercial timber or other plants grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Brush Control

Use the specified rate of **Arsenal** with the preferred application technique for control of undesirable brush.

Tank Mixes and Application Rates for Low-volume Foliar Brush Control*

Target Vegetation	Arsenal Rate (% by volume)	Tank Mix
Mixed hardwoods without elm, locust, or pine	1.0 to 1.5	Surfactant
Mixed hardwoods containing elm, locust, and pine	0.5 to 1.0	**Accord®** at 2% to 3% by volume plus surfactant
Mixed hardwoods with locust and pine but no elm		**Krenite®** at 2% to 5% by volume plus surfactant
Mixed hardwoods with locust and elm but no pine		**Escort®** at 2 ozs/A **or** 2.3 grams/gal plus surfactant

* Tank mixes with 2,4-D or products containing 2,4-D have resulted in reduced **Arsenal** efficacy.

Backpack and Handheld Spray Mixing Guide

% solution	Product per gallon of mix (fl ozs)	Product per 4-gallon backpack (fl ozs)
0.25	0.3	1.3
0.5	0.6	2.6
1.0	1.3	5.1
2.0	2.6	10.2
3.0	3.8	15.4
5.0	6.4	25.6

Measuring Chart

128 fluid ounces	=	1 gallon
16 fluid ounces	=	1 pint
8 pints	=	1 gallon
4 quarts	=	1 gallon
2 pints	=	1 quart

Selective Control of Undesirable Weeds in Unimproved Bermudagrass and Bahiagrass

Arsenal® herbicide may be used on unimproved Bermudagrass and Bahiagrass turf such as roadsides, utility rights-of-way, and other nonagricultural lands. **Arsenal** application on established common and coastal Bermudagrass and Bahiagrass provides control of labeled broadleaf and grass weeds. Competition from these weeds is eliminated, releasing the Bermudagrass and Bahiagrass. Treatment of Bermudagrass with **Arsenal** results in a compacted growth habit and seedhead inhibition.

Uniformly apply with properly calibrated ground equipment using at least 10 gallons of water per acre.

Temporary yellowing of grass may occur when treatment is made after growth begins.

- **DO NOT** add surfactant in excess of the specified rate (1 fl oz per 25 gallons of spray solution).
- **DO NOT APPLY** to grass during its first growing season.
- **DO NOT APPLY** to grass under stress from drought, disease, insects, or other causes.

Dosage Rate and Timing

Bermudagrass. Apply **Arsenal** at 6 fl ozs to 12 fl ozs per acre when Bermudagrass is dormant. Apply **Arsenal** at 6 fl ozs to 8 fl ozs per acre after Bermudagrass has reached full greenup. Applications made during greenup will delay greenup. Include a surfactant in the spray solution.

For additional preemergence control of annual grass and small-seeded broadleaf weeds, add **Pendulum® AquaCap™ herbicide** at the rate of 3.1 to 6.3 pints per acre. Consult the **Pendulum AquaCap** label for weeds controlled and for other use directions and precautions.

For control of Johnsongrass in Bermudagrass turf, apply **Arsenal** at 8 fl ozs per acre, plus **Roundup® herbicide** at 12 fl ozs per acre, plus surfactant. For additional control of broadleaves and vines, **Garlon® 3A herbicide** may be added to the above mix at 1 to 2 pints per acre. Observe all precautions and restrictions on the **Garlon 3A** and **Roundup** labels.

Bahiagrass. Apply **Arsenal** at 4 fl ozs to 8 fl ozs per acre when Bahiagrass is dormant or after grass has initiated greenup but has not exceeded 25% greenup. Include a surfactant in the spray solution; see **Adjuvants** section for specific use directions for surfactants.

Weeds Controlled in Unimproved Bermudagrass and Bahiagrass

Common Name	Scientific Name
Bedstraw*	*Galium* spp.
Bishopweed*	*Ptilimnium capillaceum*
Buttercup*	*Ranunculus parviflorus*
Carolina geranium	*Geranium carolinianum*
Fescue	*Festuca* spp.
Foxtail	*Setaria* spp.
Little barley	*Hordeum pusillum*
Seedling Johnsongrass	*Sorghum halepense*
White clover	*Trifolium repens*
Wild carrot	*Daucus carota*
Yellow woodsorrel	*Oxalis stricta*

* Use not permitted in California unless otherwise directed by supplemental labeling.

Grass Growth and Seedhead Suppression

Arsenal may be used to suppress growth and seedhead development of certain turfgrass in unimproved areas. When **Arsenal** is applied to desirable turf, it may result in temporary turf damage and/or discoloration. Effects to the desirable turf may vary with environmental conditions. For optimum performance, apply before culm elongation. Applications may be made before or after mowing. If applied before mowing, allow at least 3 days of active growth before mowing. If applied after mowing, allow sufficient time for grass to recover before applying this product or injury may be amplified.

DO NOT APPLY to turf under stress (drought, cold, insect damage, etc.) or severe injury or death may occur.

Bermudagrass. Apply **Arsenal** at 6 fl ozs to 8 fl ozs per acre from early greenup to before seedhead initiation. **DO NOT** add surfactant for this application.

Cool-season Unimproved Turf. Apply **Arsenal** at 2 fl ozs per acre plus 0.25% nonionic surfactant. For increased suppression, **Arsenal** may be tank mixed with products such as **Embark® growth regulator** (8 fl ozs per acre). Tank mixes may increase injury to desired turf. Consult each product label for labeled turf species and other use directions and precautions. Tank mixes with 2,4-D or products containing 2,4-D may decrease the effectiveness of **Arsenal**.

Total Vegetation Control where Bare Ground is Desired

Arsenal® herbicide is an effective herbicide for pre-emergence or postemergence control of many annual and perennial broadleaf and grass weeds where bare ground is desired. **Arsenal** is particularly effective on hard-to-control perennial grasses. **Arsenal** at 1.5 to 6 pints per acre can be used alone or in tank mix with herbicides approved for use in bare ground. The degree and duration of control are dependent on **Arsenal** rate used, tank mix partner, volume of carrier, soil texture, rainfall, and other conditions.

Consult manufacturer's labels for specific rates and weeds controlled. Always follow the more restrictive label restrictions and precautions for all products used when making an application involving tank mixes.

Applications of **Arsenal** may be made any time of the year. Use equipment calibrated to deliver desired gallons per acre spray volume and uniformly distribute the spray pattern over the treated area.

Postemergence Application. Always use a spray adjuvant (see **Adjuvants** section of this label) when making a postemergence application. For optimum performance on tough-to-control annual grass weeds, apply **Arsenal** at a total volume of 100 gallons per acre or less. For quicker burndown or brownout of target weeds, **Arsenal** may be tank mixed with **Roundup® herbicide**. Tank mixes with 2,4-D or products containing 2,4-D may reduce the performance of **Arsenal**. Always follow the most restrictive label restrictions and precautions for all products used when tank mixing.

Spot Treatment. Arsenal may be used as a follow-up treatment to control escapes or weed encroachment in a bareground situation. To prepare the spray solution, thoroughly mix in each gallon of water 0.5% to 5% **Arsenal** plus an adjuvant. For increased burndown, include **Roundup** as a tank mixture. For added residual weed control or to increase the weed spectrum, add **Pendulum® AquaCap™ herbicide**, **Overdrive® herbicide**, or diuron. Always follow the most restrictive label restrictions and precautions for all products used when tank mixing.

Control of Undesirable Weeds under Paved Surfaces

Arsenal can be used under asphalt, pond liners, and other paved areas, **ONLY** in industrial sites or where the pavement has a suitable barrier along the perimeter that prevents encroachment of roots of desirable plants.

Use **Arsenal** only where the area to be treated has been prepared according to good construction practices. If rhizomes, stolons, tubers, or other vegetative plant parts are present in the site, remove them by scalping with a grader blade to a depth sufficient to ensure their complete removal.

Follow **Arsenal** applications with paving as soon as possible. **DO NOT** apply where **Arsenal** may contact the roots of desirable trees or other plants.

Arsenal is not to be used under pavement on residential properties, such as driveways or parking lots, or for use in recreational areas, such as under bike or jogging paths, golf cart paths, or tennis courts, or where landscape plantings could be anticipated.

Injury or death of desirable plants may result if **Arsenal** is applied where roots are present or where roots may extend into the treated area. Roots of trees and shrubs may extend a considerable distance beyond the branch extremities (drip line).

Apply to the soil surface only when final grade is established. **DO NOT** move soil following **Arsenal** application.

Apply **Arsenal** in sufficient water (at least 100 gals per acre) to ensure thorough and uniform wetting of the soil surface, including shoulder areas. Add **Arsenal** at a rate of 3 quarts per acre (2.2 fluid ounces per 1000 square feet) to clean water in the spray tank during filling operation. Agitate before spraying.

If soil is not moist before treatment, incorporation of **Arsenal** is needed for herbicide activation. Incorporate **Arsenal** into the soil to a depth of 4 to 6 inches using a rototiller or disc. Rainfall or irrigation of 1 inch will also provide uniform incorporation. **DO NOT** allow treated soil to wash or move into untreated areas.

Spot Treatment and Crack-and-crevice Treatment

Use **Arsenal** as an initial or follow-up treatment to control weed escapes or weed encroachment in a bareground situation, including cracks and crevices in paved surfaces such as roadways, runways, and parking areas.

Grass Pasture and Rangeland Spot Treatment Weed Control

For control of undesirable vegetation in grass pasture and rangeland, **Arsenal** may be applied as a spot treatment at a rate of 2 to 48 fluid ounces of product per treated acre using any of the described ground application methods. Spot applications to grass pasture and rangeland may not exceed more than 1/10 of the area to be grazed or cut for hay. See appropriate sections of this label for specific use directions for the application method and vegetation control desired. **DO NOT** apply more than 48 fluid ounces of **Arsenal** per acre per year.

Grazing and Haying Restrictions

- There are no grazing restrictions following **Arsenal** application.
- **DO NOT** cut forage grass for hay for 7 days after **Arsenal** application.

Rangeland Use Instructions

Arsenal® herbicide may be applied to rangeland for control of undesirable vegetation to achieve one or more of the following vegetation management objectives:

- Control of undesirable (nonnative, invasive, and noxious) plant species
- Control of undesirable vegetation to aid in the establishment of desirable rangeland plant species
- Control of undesirable vegetation to aid in the establishment of desirable rangeland vegetation following a fire
- Control of undesirable vegetation to reduce wildfire fuel
- Release of existing desirable rangeland plant communities from the competitive pressure of undesirable plant species
- Control of undesirable vegetation for wildlife habitat improvement

To ensure the protection of threatened and endangered plants when applying **Arsenal** to rangeland:

- Federal agencies must follow NEPA regulations to ensure protection of threatened and endangered plants.
- State agencies must work with the Fish and Wildlife Service or the Service's designated state conservation agency to ensure protection of threatened and endangered plants.
- Other organizations or individuals must operate under a habitat conservation plan if threatened or endangered plants are known to be present on the land to be treated.

See the appropriate section(s) of this label for specific use directions for the desired rangeland vegetation management objective.

Arsenal must only be applied to a given rangeland acre as specific weed problems arise. Long-term control of undesirable weed species ultimately depends on the successful use of land management practices that promote the growth and sustainability of desirable rangeland plant species.

Rotational Crop Instructions

Rotational crops may be planted 12 months after applying **Arsenal** at the specified pasture and rangeland rate. Following 12 months after an **Arsenal** application and before planting any crop, a successful field bioassay must be completed. The field bioassay consists of a test strip of the intended rotational crop planted in the previously treated area in the grass pasture/rangeland and grown to maturity. The test strip should include low areas and knolls and include variations in soil type and pH within the treated area. If no crop injury is evident in the test strip, the intended rotational crop may be planted the following year.

Use of **Arsenal** in accordance with label directions is expected to result in normal growth of rotational crops in most situations; however, various environmental and agronomic factors make it impossible to eliminate all risks associated with the use of this product and, therefore, rotational crop injury is always possible.

Aquatic Weed Control

Arsenal may be applied for control of floating and emergent undesirable vegetation (see **Aquatic Weeds Controlled** and **Terrestrial Weeds Controlled**) in or near bodies of water that may be flowing, nonflowing, or transient. **Arsenal** may be applied to aquatic sites that include lakes, rivers, streams, ponds, seeps, drainage ditches, canals, reservoirs, swamps, bogs, marshes, estuaries, bays, brackish water, transitional areas between terrestrial and aquatic sites, riparian sites, and seasonal wet areas. See **Product Use and Restrictions** section of this label for restrictions and instructions on aquatic uses.

Read and observe the following directions if aquatic sites are present in nonagricultural lands and are part of the intended treatment area.

Arsenal must be applied to the emergent foliage of the target vegetation and has little-to-no activity on submerged aquatic vegetation. **Arsenal** concentrations resulting from direct application to water are not expected to be of sufficient concentration or duration to control target vegetation. Apply **Arsenal** to maximize spray interception by target vegetation while minimizing the amount of overspray that enters the water.

Arsenal does not control plants that are completely submerged or have a majority of their foliage under water.

Arsenal may be applied with surface or helicopter application equipment in a minimum of 2 gallons of water per acre. When applying by helicopter, follow directions under the **Aerial Application** section of this label; otherwise, refer to the **Ground Application** section when using surface equipment.

Applications to moving bodies of water should be made while traveling upstream to prevent concentration of this herbicide in water. **DO NOT** apply to bodies of water or portions of bodies of water where emergent and/or floating weeds do not exist.

When applying to target vegetation that covers a large percentage of the surface area of impounded water, treating the area in strips may avoid oxygen depletion because of decaying vegetation. Oxygen depletion may result in the suffocation of some sensitive aquatic organisms. If oxygen depletion is a concern, treat no more than 1/2 of the surface area of the water in a single operation and wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outward in bands to allow aquatic organisms to move into untreated areas.

Avoid washoff of sprayed foliage by spray boat or recreational boat backwash for 1 hour after application.

Apply **Arsenal** at 1 to 3 quarts per acre depending on species present and weed density. **DO NOT** exceed the maximum label rate of 3 quarts per acre (1.5 lbs ae/A) per year. Use the higher labeled rates for heavy weed pressure. Consult **Aquatic Weeds Controlled** and **Terrestrial Weeds Controlled** for specific rates.

Arsenal® herbicide may be applied as a draw-down treatment in areas described above. Apply **Arsenal** to weeds after water has been drained and allow 14 days before reintroduction of water.

Aquatic Weeds Controlled

Arsenal® herbicide will control the following target species as specified in the **Use Rates and Application Directions** column of the table. Rates are expressed in terms of product volume for broadcast applications and as a % solution for directed applications including spot treatments. **For % solution applications, DO NOT apply more than the equivalent of 3 quarts of Arsenal per acre.**

Common Name	Scientific Name	Use Rates and Application Directions
Floating Weeds		
*Floating heart	*Nymphodes* spp.	2 to 4 pints/A (0.5 to 1.0% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Frogbit	*Limnobium spongia*	1 to 2 pints/A (0.5% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Spatterdock	*Nuphar luteum*	Apply a tank mix of: 2 to 4 pints/A **Arsenal** + 4 to 6 pints/A glyphosate (0.5% **Arsenal** + 1.5% glyphosate) in 100 GPA water for best control. Ensure 100% coverage of actively growing emergent foliage.
*Water hyacinth	*Eichhornia crassipes*	1 to 2 pints/A (0.5% solution) applied in 100 GPA water to actively growing foliage.
*Water lettuce	*Pistia stratiotes*	1 to 2 pints/A (0.5% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
Emerged Weeds		
*Alligatorweed	*Alternanthera philoxeroides*	1 to 4 pints/A (0.5% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Arrowhead, duck-potato	*Sagittaria* spp.	1 to 2 pints/A (0.5% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Bacopa, lemon	*Bacopa* spp.	1 to 2 pints/A (0.5% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Parrot feather	*Myriophyllum aquaticum*	Foliage must be above water for sufficient **Arsenal** uptake. Apply 2 to 4 pints/A **Arsenal** to actively growing emergent foliage.
*Pennywort	*Hydrocotyle* spp.	1 to 2 pints/A (0.5% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Pickerelweed	*Pontederia cordata*	2 to 3 pints/A (1% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Taro, wild Coco yam Dasheen Elephant's ear	*Colocasia esculentum*	4 to 6 pints/A (1.5% solution) applied in 100 GPA with a high quality sticker adjuvant. Ensure good coverage of actively growing emergent foliage.

*** Use not permitted in California unless otherwise directed by supplemental labeling.**

(continued)

Aquatic Weeds Controlled *(continued)*

Common Name	Scientific Name	Use Rates and Application Directions
Emerged Weeds *(continued)*		
*Water chestnut	*Trappa natans*	4 to 6 pints/A (1.5% solution) applied in 100 GPA with a high quality sticker adjuvant. Ensure good coverage of actively growing emergent foliage.
*Water lily	*Nymphaea odorata*	2 to 3 pints/A (1% solution) applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Water primrose	*Ludwigia uruguayensis*	4 to 6 pints/A (1.5% solution). Ensure 100% coverage of actively growing emergent foliage.
Terrestrial/Marginal Weeds		
*Aquatic nightshade Soda apple	*Solanum tampicense*	2 pints/A applied to foliage
*Bamboo, Japanese	*Phyllostachys* spp.	3 to 4 pints/A applied to foliage when plant is actively growing; before setting seedhead. More foliage will result in greater herbicide uptake, resulting in greater root kill.
Beach, vitex	*Vitex rotundifolia*	5% solution + 1% MSO foliar spray 17% solution stem injection (hack and squirt)
Brazilian pepper Christmasberry	*Schinus terebinthifolius*	2 to 4 pints/A applied to foliage
Cattail	*Typha* spp.	2 to 4 pints/A (1% solution) applied to actively growing green foliage after full leaf elongation. Lower rates will control cattail in the North; higher rates are needed in the South.
Chinese tallow tree	*Sapium sebiferum*	16 to 24 fl ozs/A applied to foliage
Cogongrass	*Imperata cylindrica*	Burn foliage, till area; then fall-spray 2 quarts/A **Arsenal® herbicide** + MSO applied to new growth.
Cordgrass, prairie	*Spartina* spp.	4 to 6 pints/A applied to actively growing foliage
*Cutgrass	*Zizaniopsis miliacea*	4 to 6 pints/A applied to actively growing foliage
*Elephant grass Napier grass	*Pennisetum purpureum*	3 pints/A applied to actively growing foliage
*Flowering rush	*Butomus umbellatus* L.	2 to 3 pints/A applied to actively growing foliage
Giant reed Wild cane	*Arundo donax*	4 to 6 pints/A applied in spring to actively growing foliage
*Golden bamboo	*Phyllostachys aurea*	3 to 4 pints/A applied to foliage when plant is actively growing; before setting seedhead. More foliage will result in greater herbicide uptake, resulting in greater root kill.
Junglerice	*Echinochloa colonum*	3 to 4 pints/A applied to actively growing foliage
Knapweed	*Centaurea* spp.	**Russian knapweed:** 2 to 3 pints/A + 1 quart/A MSO fall-applied after senescence begins
Knotweed, Japanese	*Polygonum cuspidatum* *Fallopia japonica*	3 to 4 pints/A applied postemergence to actively growing foliage

*** Use not permitted in California unless otherwise directed by supplemental labeling.**

(continued)

Aquatic Weeds Controlled *(continued)*

Common Name	Scientific Name	Use Rates and Application Directions
Terrestrial/Marginal Weeds *(continued)*		
Melaleuca Paperbark tree	*Melaleuca quinquenervia*	• **Established stands** - Apply 6 pints/A **Arsenal®** **herbicide** + 6 pints/A glyphosate + spray adjuvant. For best results, use 4 quarts/A MSO as an adjuvant. • **Ground foliar application** - Uniformly apply to ensure 100% coverage. • **Broadcast foliar control** - Apply aerially in a minimum of 2 passes at 10 gallons/A applied cross treatment. • **Spot treatment** - Use a 25% **Arsenal** + 25% solution of glyphosate + 1.25% MSO in water applied as a frill or stump treatment.
*Nutgrass Kili'p'opu	*Cyperus rotundus*	2 pints/A **Arsenal** + 1 quart/A MSO applied early postemergence
*Nutsedge	*Cyperus* spp.	2 to 3 pints/A postemergence to foliage or preemergence incorporated; nonincorporated preemergence applications will not control.
Phragmites Common reed	*Phragmites australis*	4 to 6 pints/A applied to actively growing green foliage after full leaf elongation. Ensure 100% coverage. If stand has a substantial amount of old stem tissue, mow or burn; allow to regrow to approximately 5 feet tall before treatment. Lower rates will control phragmites in the North; higher rates are needed in the South.
*Poison hemlock	*Conium maculatum*	2 pints/A **Arsenal** + 1 quart/A MSO applied preemergence to early postemergence to rosette before flowering
Purple loosestrife	*Lythrum salicaria*	1 pint/A applied to actively growing foliage
Reed canarygrass	*Phalaris arundinacea*	3 to 4 pints/A applied to actively growing foliage
Rose, swamp	*Rosa palustris*	2 to 3 pints/A applied to actively growing foliage
Russian olive	*Elaeagnus angustifolia*	2 to 4 pints/A (1% solution) applied to foliage
Saltcedar Tamarisk	*Tamarix* spp.	**Aerial application** - 2 quarts **Arsenal** + 0.25% v/v NIS applied to actively growing foliage during flowering. **Spot treatment** - Use 1% solution of **Arsenal** + 0.25% v/v NIS and spray to wet foliage. After application, wait at least 2 years before disturbing treated saltcedar. Earlier disturbance can reduce overall control.
Smartweed	*Polygonum* spp.	2 pints/A applied early postemergence
Sumac	*Rhus* spp.	2 to 3 pints/A applied to foliage
Swamp morningglory Kangkong Water spinach	*Ipomoea aquatica*	1 to 2 pints/A **Arsenal** + 1 quart/A MSO applied early postemergence
Torpedo grass	*Panicum repens*	4 pints/A (1.0 to 1.5% solution). Ensure good coverage to actively growing foliage.
*White top Hoary cress	*Cardaria draba*	1 to 2 pints/A applied in spring to foliage during flowering
Willow	*Salix* spp.	2 to 3 pints/A **Arsenal** applied to actively growing foliage. Ensure good coverage.

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Terrestrial Weed Control

In terrestrial sites, **Arsenal® herbicide** will provide preemergence or postemergence control with residual control of the following target vegetation species at the rates listed. Residual control refers to control of newly germinating seedlings in both annuals and perennials. In general, annual weeds may be controlled by preemergence or postemergence applications of **Arsenal**. For established biennials and perennials, postemergence applications of **Arsenal** will provide the best control.

The rates shown below refer to broadcast applications and indicate the relative sensitivity of these weeds. The relative sensitivity should be referenced when preparing low-volume spray solutions (see **Low-volume Foliar Application** section of **Ground Application**); low-volume applications may provide control of the target species with less **Arsenal** per acre than is shown for the broadcast treatments. Use **Arsenal** only in accordance with the specific use directions on this label and the leaflet label.

Use the relative sensitivity of the species listed following to determine the relative risk of nontarget plant injury if any of the species listed following are considered to be desirable within the area to be treated.

Resistant Biotypes. Naturally occurring biotypes (a plant within a given species that has a slightly different but distinct genetic makeup from other plants of the same species) of some weeds listed on this label may not be effectively controlled. If naturally occurring resistant biotypes are present in an area, tank mix **Arsenal** or apply sequentially with an appropriate registered herbicide having a different mode of action to ensure control.

Terrestrial Weeds Controlled

Common Name	Scientific Name	Growth Habit[2]
Grass Weeds		
Apply 2 to 3 pts/A[1]		
Annual bluegrass	*Poa annua*	A
Broadleaf signalgrass	*Brachiaria platyphylla*	A
Canada bluegrass	*Poa compressa*	P
Downy brome	*Bromus tectorum*	A
Fescue	*Festuca* spp.	A/P
Foxtail	*Setaria* spp.	A
Italian ryegrass	*Lolium multiflorum*	A
Johnsongrass[4]	*Sorghum halepense*	P
Kentucky bluegrass	*Poa pratensis*	P
Napier grass[5]	*Pennisetum purpureum*	P
Orchardgrass	*Dactylis glomerata*	P
Paragrass	*Brachiaria mutica*	P
Quackgrass	*Agropyron repens*	P

(continued)

Terrestrial Weeds Controlled *(continued)*

Common Name	Scientific Name	Growth Habit[2]
Grass Weeds *(continued)*		
Apply 2 to 3 pts/A[1] *(continued)*		
Sandbur	*Cenchrus* spp.	A
Smooth brome	*Bromus inermis*	P
Vaseygrass	*Paspalum urvillei*	P
Wild oats	*Avena fatua*	A
Witchgrass	*Panicum capillare*	A
Apply 3 to 4 pts/A[1]		
Barnyardgrass	*Echinochloa crus-galli*	A
Beardgrass	*Andropogon* spp.	P
Bluegrass, annual	*Poa annua*	A
Bulrush[5]	*Scirpus validus*	P
Cheat	*Bromus secalinus*	A
Cogongrass	*Imperata cylindrica*	P
Crabgrass	*Digitaria* spp.	A
Crowfootgrass	*Dactyloctenium aegyptium*	A
Fall panicum	*Panicum dichotomiflorum*	A
Goosegrass	*Eleusine indica*	A
Itchgrass	*Rottboellia exaltata*	A
Lovegrass[4]	*Eragrostis* spp.	P
Maidencane[5]	*Panicum hemitomon*	A
Panicum, browntop	*Panicum fasciculatum*	A
Panicum, Texas	*Panicum texanum*	A
Prairie threeawn	*Aristida oligantha*	P
Sandbur, field	*Cenchrus incertus*	A
Signalgrass	*Brachiaria platyphylla*	A
Wild barley	*Hordeum* spp.	A
Woolly cupgrass	*Eriochloa villosa*	A
Apply 4 to 6 pts/A[1]		
Bahiagrass	*Paspalum notatum*	P
Bermudagrass[3, 4]	*Cynodon dactylon*	P
Big bluestem	*Andropogon gerardii*	P
Dallisgrass	*Paspalum dilatatum*	P
Feathertop	*Pennisetum villosum*	P
Guineagrass	*Panicum maximum*	P
Saltgrass[3]	*Distichlis stricta*	P
Sand dropseed	*Sporobolus cryptandrus*	P
Sprangletop	*Leptochloa* spp.	A
Timothy	*Phleum pratense*	P
Wirestem muhly	*Muhlenbergia frondosa*	P

[1] Use higher rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use a minimum of 75 GPA.
[4] Use higher labeled rates.
[5] Use not permitted in California unless otherwise directed by supplemental labeling.

Terrestrial Weeds Controlled *(continued)*

Common Name	Scientific Name	Growth Habit[2]
Broadleaf Weeds		
Apply 2 to 3 pts/A[1]		
Burdock	*Arctium* spp.	B
Carolina geranium	*Geranium carolinianum*	A
Carpetweed	*Mollugo verticillata*	A
Clover	*Trifolium* spp.	A/P
Common chickweed	*Stellaria media*	A
Common ragweed	*Ambrosia artemisiifolia*	A
Dandelion	*Taraxacum officinale*	P
Dogfennel	*Eupatorium capillifolium*	A
Filaree	*Erodium* spp.	A
Fleabane	*Erigeron* spp.	A
Hoary vervain	*Verbena stricta*	P
Indian mustard	*Brassica juncea*	A
Kochia	*Kochia scoparia*	A
Lambsquarters	*Chenopodium album*	A
Lespedeza[3]	*Lespedeza* spp.	P
Miner's lettuce	*Montia perfoliata*	A
Mullein	*Verbascum* spp.	B
Nettleleaf goosefoot	*Chenopodium murale*	A
Oxeye daisy	*Chrysanthemum leucanthemum*	P
Pepperweed	*Lepidium* spp.	A
Pigweed	*Amaranthus* spp.	A
Puncturevine	*Tribulus terrestris*	A
Russian thistle	*Salsola kali*	A
Smartweed	*Polygonum* spp.	A/P
Sorrell	*Rumex* spp.	P
Sunflower	*Helianthus* spp.	A
Sweet clover	*Melilotus* spp.	A/B
Tansymustard	*Descurainia pinnata*	A
Western ragweed	*Ambrosia psilostachya*	P
Wild carrot	*Daucus carota*	B
Wild lettuce	*Lactuca* spp.	A/B
Wild parsnip	*Pastinaca sativa*	B
Wild turnip	*Brassica campestris*	B
Woollyleaf bursage	*Franseria tomentosa*	P
Yellow woodsorrel	*Oxalis stricta*	P

(continued)

Terrestrial Weeds Controlled *(continued)*

Common Name	Scientific Name	Growth Habit[2]
Broadleaf Weeds *(continued)*		
Apply 3 to 4 pts/A[1]		
Broom snakeweed[4]	*Gutierrezia sarothrae*	P
Bull thistle	*Cirsium vulgare*	B
Burclover	*Medicago* spp.	A
Chickweed, mouseear	*Cerastium vulgatum*	A
Clover, hop	*Trifolium procumbens*	A
Cocklebur	*Xanthium strumarium*	A
Cudweed	*Gnaphalium* spp.	A
Desert camelthorn	*Alhagi pseudalhagi*	P
Dock	*Rumex* spp.	P
Fiddleneck	*Amsinckia intermedia*	A
Goldenrod	*Solidago* spp.	P
Henbit	*Lamium amplexicaule*	A
Knotweed, prostrate	*Polygonum aviculare*	A/P
Pokeweed	*Phytolacca americana*	P
Purslane	*Portulaca* spp.	A
Pusley, Florida	*Richardia scabra*	A
Rocket, London	*Sisymbrium irio*	A
Rush skeletonweed[4]	*Chondrilla juncea*	B
Saltbush	*Atriplex* spp.	A
Shepherdspurse	*Capsella bursa-pastoris*	A
Spurge, annual	*Euphorbia* spp.	A
Stinging nettle[4]	*Urtica dioica*	P
Velvetleaf	*Abutilon theophrasti*	A
Yellow starthistle	*Centaurea solstitialis*	A
Apply 4 to 6 pts/A[1]		
Arrowwood	*Pluchea sericea*	A
Canada thistle	*Cirsium arvense*	P
Giant ragweed	*Ambrosia trifida*	A
Gray rabbitbrush	*Chrysothamnus nauseosus*	P
Little mallow	*Malva parviflora*	B
Milkweed	*Asclepias* spp.	P
Primrose	*Oenothera kunthiana*	P
Silverleaf nightshade	*Solanum elaeagnifolium*	P
Sowthistle	*Sonchus* spp.	A
Texas thistle	*Cirsium texanum*	P

[1] Use higher rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use not permitted in California unless otherwise directed by supplemental labeling.
[4] For best results, early postemergence applications are required.

Terrestrial Weeds Controlled *(continued)*

Common Name	Scientific Name	Growth Habit[2]
Vines and Brambles		
Apply 1 pt/A		
Field bindweed	*Convolvulus arvensis*	P
Hedge bindweed	*Calystegia sepium*	A
Apply 2 to 3 pts/A[1]		
Wild buckwheat	*Polygonum convolvulus*	P
Apply 3 to 4 pts/A[1]		
Greenbriar	*Smilax* spp.	P
Honeysuckle[3]	*Lonicera* spp.	P
Morningglory	*Ipomoea* spp.	A/P
Poison ivy	*Rhus radicans*	P
Redvine	*Brunnichia cirrhosa*	P
Wild rose[3] including:	*Rosa* spp.	P
Multiflora rose	*Rosa multiflora*	P
Macartney rose	*Rosa bracteata*	P
Apply 4 to 6 pts/A[1]		
Trumpetcreeper	*Campsis radicans*	P
Virginia creeper	*Parthenocissus quinquefolia*	P
Wild grape	*Vitis* spp.	P

[1] Use higher rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use higher labeled rates.

Common Name	Scientific Name	Growth Habit[2]
Brush Species		
Apply 2 to 4 pts/A[1]		
Brazilian peppertree	*Schinus terebinthifolius*	P
Chinese tallow tree Popcorn tree	*Sapium sebiferum*	P
Russian olive	*Elaeagnus angustifolia*	P
Sumac	*Rhus* spp.	P
Willow	*Salix* spp.	P
Apply 4 to 6 pts/A[1]		
Alder	*Alnus* spp.	P
American beech	*Fagus grandifolia*	P
Ash[3]	*Fraxinus* spp.	P
Aspen	*Populus* spp.	P
Autumn olive	*Elaeagnus umbellata*	P
Bald cypress	*Taxodium distichum*	P
Bigleaf maple	*Acer macrophyllum*	P
Birch[3]	*Betula* spp.	P
Black gum[4]	*Nyssa sylvatica*	P
Black oak	*Quercus kelloggii*	P
Boxelder	*Acer negundo*	P
Ceanothis	*Ceanothis* spp.	P
Cherry[3, 4]	*Prunus* spp.	P

(continued)

Terrestrial Weeds Controlled *(continued)*

Common Name	Scientific Name	Growth Habit[2]
Brush Species *(continued)*		
Apply 4 to 6 pts/A[1]		
Chinaberry	*Melia azedarach*	P
Chinquapin	*Castanopsis chrysophylla*	P
Cottonwood	*Populus trichocarpa* *P. deltoides*	P
Cypress	*Taxodium* spp.	P
Dogwood[3]	*Cornus* spp.	P
Elm[5]	*Ulmus* spp.	P
Eucalyptus	*Eucalyptus* spp.	P
Hawthorn	*Crataegus* spp.	P
Hickory[3]	*Carya* spp.	P
Huckleberry	*Gaylussacia* spp.	P
Lyonia spp. including:		
Fetterbush	*Lyonia lucida*	
Staggerbush	*Lyonia mariana*	P
Madrone	*Arbutus menziesii*	P
Maple	*Acer* spp.	P
Melaleuca	*Melaleuca quinquenervia*	P
Mulberry[3, 6]	*Morus* spp.	P
Oak[7]	*Quercus* spp.	P
Persimmon[4]	*Diospyros virginiana*	P
Poison oak	*Rhus diversiloba*	P
Poplar	*Populus* spp.	P
Privet	*Ligustrum vulgare*	P
Red alder	*Alnus rubra*	P
Red maple	*Acer rubrum*	P
Saltcedar	*Tamarix pentandra*	P
Sassafras	*Sassafras albidum*	P
Sourwood[4]	*Oxydendrum arboreum*	P
Sweetgum	*Liquidambar styraciflua*	P
Sycamore	*Platanus occidentalis*	P
Tanoak[3]	*Lithocarpus densiflorus*	P
Titi[8]	*Cyrilla racemiflora*	P
Tree of heaven	*Ailanthus altissima*	P
Vaccinium spp. including:		
Blueberry	*Vaccinium* spp.	
Sparkleberry	*Vaccinium arboreum*	P
Water willow[9]	*Justicia americana*	P
Yellow poplar[3]	*Liriodendron tulipifera*	P

[1] Use higher rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use higher labeled rates.
[4] Best control with applications before formation of fall leaf color
[5] Tank mix with glyphosate
[6] Degree of control may be species dependent.
[7] For water oak (*Quercus nigra*), laurel oak (*Q. laurifloria*), willow oak (*Q. phellos*), and live oak (*Q. virginiana*), use higher labeled rates.
[8] Suppression only
[9] **Use not permitted in California unless otherwise directed by supplemental labeling.**

Conditions of Sale and Warranty

The **Directions For Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and must be followed carefully. However, 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 weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF") or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer.

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Based on: NVA 2011-04-104-0062
Supersedes: NVA 2011-04-104-0115

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
The Chemical Company

Safety Data Sheet
ARSENAL HERBICIDE

1. Identification

Product identifier used on the label

ARSENAL HERBICIDE

Recommended use of the chemical and restriction on use
Recommended use*: herbicide

* The “Recommended use” identified for this product is provided solely to comply with a Federal requirement and is not part of the seller's published specification. The terms of this Safety Data Sheet (SDS) do not create or infer any warranty, express or implied, including by incorporation into or reference in the seller's sales agreement.

Details of the supplier of the safety data sheet

Company:
BASF CORPORATION
100 Park Avenue
Florham Park, NJ 07932, USA

Telephone: +1 973 245-6000

Emergency telephone number

CHEMTREC: 1-800-424-9300
BASF HOTLINE: 1-800-832-HELP (4357)

Other means of identification

Substance number:	63383
EPA Registration number:	241-346
Molecular formula:	C(13) H(15) N(3) O(3). C(3) H(9) N
Chemical family:	imidazole derivative
Synonyms:	Isopropylamine salt of imazapyr

2. Hazards Identification

According to Regulation 2012 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

Label elements

The product does not require a hazard warning label in accordance with GHS criteria.

Hazards not otherwise classified

Labeling of special preparations (GHS):
The following percentage of the mixture consists of components(s) with unknown hazards regarding the acute toxicity: 0 - 1 % dermal
The following percentage of the mixture consists of components(s) with unknown hazards regarding the acute toxicity: 0 - 1 % oral
The following percentage of the mixture consists of components(s) with unknown hazards regarding the acute toxicity: 0 - 1 % Inhalation - vapour
The following percentage of the mixture consists of components(s) with unknown hazards regarding the acute toxicity: 0 - 1 % Inhalation - mist

According to Regulation 1994 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

Emergency overview

CAUTION:
KEEP OUT OF REACH OF CHILDREN.
Avoid contact with the skin, eyes and clothing.
Avoid inhalation of mists/vapours.

3. Composition / Information on Ingredients

According to Regulation 2012 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

CAS Number	Weight %	Chemical name
81510-83-0	27.8 %	Isopropylamine salt of imazapyr

According to Regulation 1994 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

CAS Number	Weight %	Chemical name
81510-83-0	>= 27.77 - <= 27.8%	Isopropylamine salt of imazapyr
	72.2 %	Proprietary ingredients

4. First-Aid Measures

Description of first aid measures

General advice:
First aid personnel should pay attention to their own safety. If the patient is likely to become unconscious, place and transport in stable sideways position (recovery position). Immediately remove contaminated clothing.

If inhaled:
Keep patient calm, remove to fresh air, seek medical attention. Immediately administer a corticosteroid from a controlled/metered dose inhaler.

If on skin:
Immediately wash thoroughly with plenty of water, apply sterile dressings, consult a skin specialist.

If in eyes:
Immediately wash affected eyes for at least 15 minutes under running water with eyelids held open, consult an eye specialist.

If swallowed:
Do not induce vomiting. Immediately rinse mouth and then drink 200-300 ml of water, seek medical attention.

Most important symptoms and effects, both acute and delayed

Symptoms: No significant reaction of the human body to the product known.

Indication of any immediate medical attention and special treatment needed

Note to physician

Treatment: Treat according to symptoms (decontamination, vital functions), no known specific antidote.

5. Fire-Fighting Measures

Extinguishing media

Suitable extinguishing media:
foam, dry powder, carbon dioxide, water spray

Special hazards arising from the substance or mixture

Hazards during fire-fighting:
carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons,
If product is heated above decomposition temperature, toxic vapours will be released. The substances/groups of substances mentioned can be released if the product is involved in a fire.

Advice for fire-fighters

Protective equipment for fire-fighting:
Firefighters should be equipped with self-contained breathing apparatus and turn-out gear.

Further information:
Evacuate area of all unnecessary personnel. Contain contaminated water/firefighting water. Do not allow to enter drains or waterways.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

Take appropriate protective measures. Clear area. Shut off source of leak only under safe conditions. Extinguish sources of ignition nearby and downwind. Ensure adequate ventilation. Wear suitable personal protective clothing and equipment.

Environmental precautions

Do not discharge into the subsoil/soil. Do not discharge into drains/surface waters/groundwater. Contain contaminated water/firefighting water.

Methods and material for containment and cleaning up

Dike spillage. Pick up with suitable absorbent material. Place into suitable containers for reuse or disposal in a licensed facility. Spilled substance/product should be recovered and applied according to label rates whenever possible. If application of spilled substance/product is not possible, then spills should be contained, solidified, and placed in suitable containers for disposal. After decontamination, spill area can be washed with water. Collect wash water for approved disposal.

7. Handling and Storage

Precautions for safe handling

RECOMMENDATIONS ARE FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS. PESTICIDE APPLICATORS & WORKERS must refer to the Product Label and Directions for Use attached to the product for Agricultural Use Requirements in accordance with the EPA Worker Protection Standard 40 CFR part 170. Ensure adequate ventilation. Provide good ventilation of working area (local exhaust ventilation if necessary). Keep away from sources of ignition - No smoking. Keep container tightly sealed. Protect contents from the effects of light. Protect against heat. Protect from air. Handle and open container with care. Do not open until ready to use. Once container is opened, content should be used as soon as possible. Avoid aerosol formation. Avoid dust formation. Provide means for controlling leaks and spills. Do not return residues to the storage containers. Follow label warnings even after container is emptied. The substance/ product may be handled only by appropriately trained personnel. Avoid all direct contact with the substance/product. Avoid contact with the skin, eyes and clothing. Avoid inhalation of dusts/mists/vapours. Wear suitable personal protective clothing and equipment.

Protection against fire and explosion:
The relevant fire protection measures should be noted. Fire extinguishers should be kept handy. Avoid all sources of ignition: heat, sparks, open flame. Sources of ignition should be kept well clear. Avoid extreme heat. Keep away from oxidizable substances. Electrical equipment should conform to national electric code. Ground all transfer equipment properly to prevent electrostatic discharge. Electrostatic discharge may cause ignition.

Conditions for safe storage, including any incompatibilities

Segregate from incompatible substances. Segregate from foods and animal feeds. Segregate from textiles and similar materials.

Further information on storage conditions: Keep only in the original container in a cool, dry, well-ventilated place away from ignition sources, heat or flame. Protect containers from physical damage. Protect against contamination. The authority permits and storage regulations must be observed.
Protect from temperatures below: 0 °C
Changes in the properties of the product may occur if substance/product is stored below indicated temperature for extended periods of time.
Protect from temperatures above: 40 °C
Changes in the properties of the product may occur if substance/product is stored above indicated temperature for extended periods of time.

8. Exposure Controls/Personal Protection

Users of a pesticidal product should refer to the product label for personal protective equipment requirements.

Advice on system design:
Whenever possible, engineering controls should be used to minimize the need for personal protective equipment.

Personal protective equipment

RECOMMENDATIONS FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS:

Respiratory protection:
Wear respiratory protection if ventilation is inadequate. Wear a NIOSH-certified (or equivalent) TC23C Chemical/Mechanical type filter system to remove a combination of particles, gas and vapours. For situations where the airborne concentrations may exceed the level for which an air

purifying respirator is effective, or where the levels are unknown or Immediately Dangerous to Life or Health (IDLH), use NIOSH-certified full facepiece pressure demand self-contained breathing apparatus (SCBA) or a full facepiece pressure demand supplied-air respirator (SAR) with escape provisions.

Hand protection:
Chemical resistant protective gloves, Protective glove selection must be based on the user's assessment of the workplace hazards.

Eye protection:
Safety glasses with side-shields. Tightly fitting safety goggles (chemical goggles). Wear face shield if splashing hazard exists.

Body protection:
Body protection must be chosen depending on activity and possible exposure, e.g. head protection, apron, protective boots, chemical-protection suit.

General safety and hygiene measures:
Wear long sleeved work shirt and long work pants in addition to other stated personal protective equipment. Work place should be equipped with a shower and an eye wash. Handle in accordance with good industrial hygiene and safety practice. Personal protective equipment should be decontaminated prior to reuse. Gloves must be inspected regularly and prior to each use. Replace if necessary (e.g. pinhole leaks). Take off immediately all contaminated clothing. Store work clothing separately. Hands and/or face should be washed before breaks and at the end of the shift. No eating, drinking, smoking or tobacco use at the place of work. Keep away from food, drink and animal feeding stuffs.

9. Physical and Chemical Properties

Form:	liquid
Odour:	ammonia-like, faint odour
Odour threshold:	not applicable, odour not perceivable
Colour:	blue, clear
pH value:	6.6 - 7.2
Freezing point:	approx. 0 °C (1,013.3 hPa) Information applies to the solvent.
Boiling point:	approx. 100 °C (1,013.3 hPa) Information applies to the solvent.
Flash point:	A flash point determination is unnecessary due to the high water content.
Flammability:	not applicable
Lower explosion limit:	As a result of our experience with this product and our knowledge of its composition we do not expect any hazard as long as the product is used appropriately and in accordance with the intended use.
Upper explosion limit:	As a result of our experience with this product and our knowledge of its composition we do not expect any hazard as long as the product is used appropriately and in accordance with the intended use.
Autoignition:	Based on the water content the product does not ignite.

Vapour pressure:	approx. 23.3 hPa (20 °C) Information applies to the solvent. < 100 hPa (50 °C) Information applies to the solvent.
Density:	1.04 - 1.09 g/ml
Vapour density:	not applicable
Partitioning coefficient n-octanol/water (log Pow):	not applicable
Thermal decomposition:	carbon monoxide, carbon dioxide, nitrogen oxide Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released. If product is heated above decomposition temperature hazardous fumes may be released.
Viscosity, dynamic:	approx. 26.3 mPa.s (20 °C)
Solubility in water:	miscible
Molar mass:	320.4 g/mol
Evaporation rate:	not applicable
Other Information:	If necessary, information on other physical and chemical parameters is indicated in this section.

10. Stability and Reactivity

Reactivity
No hazardous reactions if stored and handled as prescribed/indicated.

Corrosion to metals:
Corrosive effect on: mild steel brass

Oxidizing properties:
Not an oxidizer.

Chemical stability
The product is stable if stored and handled as prescribed/indicated.

Possibility of hazardous reactions
The product is chemically stable.

Conditions to avoid
Avoid all sources of ignition: heat, sparks, open flame. Avoid prolonged storage. Avoid electro-static discharge. Avoid contamination. Avoid prolonged exposure to extreme heat. Avoid extreme temperatures.

Incompatible materials
oxidizing agents, reducing agents

Hazardous decomposition products

Decomposition products:
Hazardous decomposition products: No hazardous decomposition products if stored and handled as prescribed/indicated., Prolonged thermal loading can result in products of degradation being given off.

Thermal decomposition:
Possible thermal decomposition products:

carbon monoxide, carbon dioxide, nitrogen oxide
Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released. If product is heated above decomposition temperature hazardous fumes may be released.

11. Toxicological information

Primary routes of exposure

Routes of entry for solids and liquids are ingestion and inhalation, but may include eye or skin contact. Routes of entry for gases include inhalation and eye contact. Skin contact may be a route of entry for liquefied gases.

Acute Toxicity/Effects

Acute toxicity
Assessment of acute toxicity: Relatively nontoxic after single ingestion. Slightly toxic after short-term skin contact. Relatively nontoxic after short-term inhalation.

Oral
Type of value: LD50
Species: rat (male/female)
Value: > 5,000 mg/kg

Inhalation
Type of value: LC50
Species: rat (male/female)
Value: > 5.3 mg/l (OECD Guideline 403)
Exposure time: 4 h
An aerosol was tested.

Dermal
Type of value: LD50
Species: rabbit (male/female)
Value: > 2,000 mg/kg

Irritation / corrosion
Assessment of irritating effects: May cause slight but temporary irritation to the eyes. May cause slight irritation to the skin.

Skin
Species: rabbit
Result: Slightly irritating.
Method: Primary skin irritation test

Eye
Species: rabbit
Result: non-irritant

Sensitization
Assessment of sensitization: Skin sensitizing effects were not observed in animal studies.

Skin sensitization test
Species: guinea pig
Result: Skin sensitizing effects were not observed in animal studies.

Chronic Toxicity/Effects

Repeated dose toxicity
Assessment of repeated dose toxicity: The product has not been tested. The statement has been derived from the properties of the individual components. No substance-specific organtoxicity was observed after repeated administration to animals.

Genetic toxicity
Assessment of mutagenicity: The product has not been tested. The statement has been derived from the properties of the individual components. Mutagenicity tests revealed no genotoxic potential.

Carcinogenicity
Assessment of carcinogenicity: The product has not been tested. The statement has been derived from the properties of the individual components. The results of various animal studies gave no indication of a carcinogenic effect.

Reproductive toxicity
Assessment of reproduction toxicity: The product has not been tested. The statement has been derived from the properties of the individual components. The results of animal studies gave no indication of a fertility impairing effect.

Teratogenicity
Assessment of teratogenicity: The product has not been tested. The statement has been derived from the properties of the individual components. Animal studies gave no indication of a developmental toxic effect at doses that were not toxic to the parental animals.

Other Information
Misuse can be harmful to health.

Symptoms of Exposure

No significant reaction of the human body to the product known.

Medical conditions aggravated by overexposure
Data available do not indicate that there are medical conditions that are generally recognized as being aggravated by exposure to this substance/product. See MSDS section 11 - Toxicological information.

12. Ecological Information

Toxicity

Aquatic toxicity
Assessment of aquatic toxicity:
There is a high probability that the product is not acutely harmful to fish. There is a high probability that the product is not acutely harmful to aquatic invertebrates. Acutely harmful for aquatic plants.

Toxicity to fish

Information on: Imazapyr
LC50 (96 h) >100PPM, Oncorhynchus mykiss (static)
LC50 (96 h) >100 ppm, Lepomis macrochirus (static)

Aquatic invertebrates

Information on: Imazapyr

EC50 (24 h) > 100 ppm, Daphnia magna

Aquatic plants

Information on: Imazapyr
EC50 (96 h) >1 ppm, Selenastrum capricornutum (static)
EC50 (14 d) 24, Lemna gibba

Chronic toxicity to fish

Information on: Imazapyr
No observed effect concentration (62 d) > 92.4 mg/l, Oncorhynchus mykiss
---

Chronic toxicity to aquatic invertebrates

Information on: Imazapyr
No observed effect concentration (21 d) > 97.1 mg/l, Daphnia magna
---

Assessment of terrestrial toxicity
With high probability not acutely harmful to terrestrial organisms.

Other terrestrial non-mammals

Information on: imazapyr
LC50, Anas platyrhynchos
With high probability not acutely harmful to terrestrial organisms.
LD50 > 100 ug/bee, Apis mellifera
With high probability not acutely harmful to terrestrial organisms.

Persistence and degradability

Assessment biodegradation and elimination (H2O)
The product has not been tested. The statement has been derived from the properties of the individual components.

Elimination information

Not readily biodegradable (by OECD criteria).

Bioaccumulative potential

Assessment bioaccumulation potential
The product has not been tested. The statement has been derived from the properties of the individual components.

Assessment bioaccumulation potential

Information on: Imazapyr

Does not accumulate in organisms.

Mobility in soil

Assessment transport between environmental compartments
The product has not been tested. The statement has been derived from the properties of the individual components.

Information on: Imazapyr

The substance will not evaporate into the atmosphere from the water surface.
Following exposure to soil, the product trickles away and can - dependant on degradation - be transported to deeper soil areas with larger water loads.

Additional information

Other ecotoxicological advice:
The ecological data given are those of the active ingredient. Do not release untreated into natural waters.

13. Disposal considerations

Waste disposal of substance:
Pesticide wastes are regulated. Improper disposal of excess pesticide, spray mix or rinsate is a violation of federal law. If pesticide wastes cannot be disposed of according to label instructions, contact the State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container disposal:
Rinse thoroughly at least three times (triple rinse) in accordance with EPA recommendations. Consult state or local disposal authorities for approved alternative procedures such as container recycling. Recommend crushing, puncturing or other means to prevent unauthorized use of used containers.

RCRA:
This product is not regulated by RCRA.

14. Transport Information

Land transport
USDOT

Not classified as a dangerous good under transport regulations

Sea transport
IMDG

Hazard class:	9
Packing group:	III
ID number:	UN 3082
Hazard label:	9, EHSM
Marine pollutant:	YES
Proper shipping name:	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (contains IMAZAPYR)

Air transport
IATA/ICAO

Hazard class:	9

Packing group:	III
ID number:	UN 3082
Hazard label:	9, EHSM
Proper shipping name:	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (contains IMAZAPYR)

15. Regulatory Information

Federal Regulations

Registration status:

Crop Protection	TSCA, US	released / exempt
Chemical	TSCA, US	blocked / not listed

EPCRA 311/312 (Hazard categories): Acute; Chronic

CA Prop. 65:
There are no listed chemicals in this product.

NFPA Hazard codes:
Health : 1 Fire: 1 Reactivity: 1 Special:

Labeling requirements under FIFRA

This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label.

CAUTION:
KEEP OUT OF REACH OF CHILDREN.
Avoid contact with the skin, eyes and clothing.
Avoid inhalation of mists/vapours.

16. Other Information

SDS Prepared by:
BASF NA Product Regulations
SDS Prepared on: 2015/06/25

We support worldwide Responsible Care® initiatives. We value the health and safety of our employees, customers, suppliers and neighbors, and the protection of the environment. Our commitment to Responsible Care is integral to conducting our business and operating our facilities in a safe and environmentally responsible fashion, supporting our customers and suppliers in ensuring the safe and environmentally sound handling of our products, and minimizing the impact of our operations on society and the environment during production, storage, transport, use and disposal of our products.

IMPORTANT: WHILE THE DESCRIPTIONS, DESIGNS, DATA AND INFORMATION CONTAINED HEREIN ARE PRESENTED IN GOOD FAITH AND BELIEVED TO BE ACCURATE , IT IS PROVIDED FOR YOUR GUIDANCE ONLY. BECAUSE MANY FACTORS MAY AFFECT PROCESSING OR APPLICATION/USE, WE RECOMMEND THAT YOU MAKE TESTS TO DETERMINE THE SUITABILITY OF A PRODUCT FOR YOUR PARTICULAR PURPOSE PRIOR TO USE. NO WARRANTIES OF ANY KIND, EITHER EXPRESSED OR IMPLIED, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, ARE MADE REGARDING PRODUCTS DESCRIBED OR DESIGNS, DATA OR INFORMATION SET FORTH, OR THAT THE PRODUCTS, DESIGNS, DATA OR INFORMATION MAY BE USED WITHOUT INFRINGING THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS. IN NO CASE SHALL THE DESCRIPTIONS, INFORMATION, DATA OR DESIGNS PROVIDED BE CONSIDERED A PART OF OUR TERMS AND CONDITIONS OF SALE. FURTHER, YOU EXPRESSLY UNDERSTAND AND AGREE THAT THE DESCRIPTIONS, DESIGNS, DATA, AND INFORMATION FURNISHED BY OUR COMPANY HEREUNDER ARE GIVEN GRATIS AND WE ASSUME NO OBLIGATION OR LIABILITY FOR THE DESCRIPTION, DESIGNS, DATA AND INFORMATION GIVEN OR RESULTS OBTAINED, ALL SUCH BEING GIVEN AND ACCEPTED AT YOUR RISK.
END OF DATA SHEET

ARSENAL® POWERLine™ herbicide

SPECIMEN

For the control of undesirable vegetation in grass pasture, rangeland and industrial noncropland areas including railroad, utility plant sites, petroleum tank farms, pumping installations, storage areas; utility, pipeline, and highway rights-of-way; fence rows; nonirrigation ditchbanks; and for the establishment and maintenance of wildlife openings

Active Ingredient:

isopropylamine salt of imazapyr (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3-pyridinecarboxylic acid)*	26.7%
Other Ingredients:	73.3%
Total:	100.0%

* Equivalent to 21.8% 2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3-pyridinecarboxylic acid or 2 pounds acid per gallon

EPA Reg. No. 241-431 **EPA Est. No.**

KEEP OUT OF REACH OF CHILDREN
CAUTION/PRECAUCIÓN

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.)

See inside for complete **First Aid**, **Precautionary Statements**, **Directions For Use**, **Conditions of Sale and Warranty**, and state-specific crop and/or use site restrictions.

In case of an emergency endangering life or property involving this product, call day or night 1-800-832-HELP (4357).

Net Contents:

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
The Chemical Company

FIRST AID	
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 by a poison control center or doctor. • **DO NOT** give anything to an unconscious person.
If in eyes	• Hold eyes open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after first 5 minutes; then continue rinsing eyes. • Call a poison control center or doctor for treatment advice.
If on skin	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
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.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact BASF Corporation for emergency medical treatment information: 1-800-832-HELP (4357).	

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed, causes moderate eye irritation. Avoid contact with eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are barrier laminate, butyl rubber, or polyethylene. 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:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves for all mixers and loaders, plus applicators using handheld equipment

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

Engineering Controls

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands with plenty of soap and water 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.
- 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.

Physical and Chemical Hazards

Spray solutions of **Arsenal® PowerLine™ herbicide** should be mixed, stored and applied only in stainless steel, fiberglass, plastic and plastic-lined steel containers.

DO NOT mix, store or apply **Arsenal PowerLine** or spray solutions of **Arsenal PowerLine** in unlined steel (except stainless steel) containers or spray tanks.

Environmental Hazards

This product is toxic to plants. Drift and runoff may be hazardous to plants in water adjacent to treated areas. **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 washwater or rinsate. See **Directions For Use** for additional precautions and requirements.

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.

Arsenal® PowerLine™ herbicide must be used only in accordance with instructions on the leaflet label attached to the container. Keep containers closed to avoid spills and contamination.

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 **48 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:

- Protective eyewear
- Coveralls
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material.

NONAGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard (WPS) 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.

DO NOT enter or allow others to enter treated areas until sprays have dried.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

Pesticide Storage

DO NOT store below 10° F.

Pesticide Disposal

Wastes resulting from the use of this product must be disposed of of on-site or at an approved waste disposal facility.

(continued)

STORAGE AND DISPOSAL *(continued)*

Container Handling

Nonrefillable Container. DO NOT reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity ≤ 5 gallons) 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.

Triple rinse containers too large to shake (capacity > 5 gallons) as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or 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.

Refillable Container. Refill this container with pesticide only. **DO NOT** reuse this container for any other purpose. Triple rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

Triple rinse as follows: To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

(continued)

STORAGE AND DISPOSAL *(continued)*

Container Handling *(continued)*

When this container is empty, replace the cap and seal all openings that have been opened during use; return the container to the point of purchase or to a designated location. This container must only be refilled with a pesticide product. Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn-out threads and closure devices. Check for leaks after refilling and before transport. **DO NOT** transport if this container is damaged or leaking. If the container is damaged, or leaking, or obsolete and not returned to the point of purchase or to a designated location, triple rinse emptied container and offer for recycling, if available, or dispose of container in compliance with state and local regulations.

In Case of Spill

In case of large-scale spillage regarding this product, call:

- CHEMTREC 1-800-424-9300
- BASF Corporation 1-800-832-HELP (4357)

Steps to be taken in case material is released or spilled:

- Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal.
- Remove contaminated clothing, and wash affected skin areas with soap and water.
- Wash clothing before reuse.
- Keep the spill out of all sewers and open bodies of water.

RESTRICTIONS

DO NOT use on food crops. Keep from contact with fertilizers, insecticides, fungicides and seeds. **DO NOT** drain or flush 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 where roots of desirable vegetation may extend and be exposed to potential injury and/or mortality from root uptake of **Arsenal® PowerLine™ herbicide** unless this risk is acceptable. **DO NOT** side trim desirable vegetation with this product unless severe injury or plant death can be tolerated. **DO NOT** allow sprays to drift onto desirable plants.

Clean application equipment after using this product by thoroughly flushing with water.

PRODUCT INFORMATION

Use Sites. Arsenal PowerLine is an aqueous solution to be mixed with water and a surfactant and applied as a spray solution to grass pasture and rangeland and industrial noncropland including utility plant sites, petroleum tank farms, pumping installations, storage areas; railroad, utility, and highway rights-of-way; fence rows; and nonirrigation ditchbanks including grazed or hayed areas within these sites. **Arsenal PowerLine** is recommended for the establishment and maintenance of wildlife openings. **Arsenal PowerLine** may also be used for the release of unimproved Bermudagrass (see specific directions) and for use under certain paved surfaces (see specific directions).

Application Methods. Arsenal PowerLine will control most annual and perennial grasses and broadleaf weeds in addition to many brush and vine species. **Arsenal PowerLine** will provide residual control of labeled weeds that germinate in the treated areas. This product may be applied either preemergence or postemergence to the weeds; however, postemergence application is the method of choice in most situations, particularly for perennial species. For maximum activity, weeds should be growing vigorously at the time of postemergence application, and the spray solution should include a surfactant (see **ADJUVANTS** section for specific recommendations). These solutions may be applied selectively using low-volume techniques or may be applied broadcast by using ground equipment or aerial equipment. In addition, **Arsenal PowerLine** may also be used for stump and cut stem treatments (see specific directions).

Herbicidal Activity. Arsenal PowerLine is readily absorbed through leaves, stems, and roots and is translocated rapidly throughout the plant, with accumulation in the meristematic regions. Treated plants stop growing soon after spray application. Chlorosis appears first in the newest leaves, and necrosis spreads from this point. In perennials, the herbicide is translocated into, and kills, underground storage organs which prevents regrowth. Chlorosis and tissue necrosis may not be apparent in some plant species until 2 weeks after application. Complete kill of plants may not occur for several weeks. Applications of **Arsenal PowerLine** are rainfast 1 hour after treatment.

PRECAUTIONS FOR AVOIDING INJURY TO NONTARGET PLANTS

Untreated trees can occasionally be affected by root uptake of **Arsenal PowerLine** through movement into the top soil. Injury or loss of desirable trees or other plants may result if **Arsenal PowerLine** is applied on or near desirable trees or other plants, on areas where their roots extend, or in locations where the treated soil may be washed or moved into contact with their roots.

SPRAY DRIFT REQUIREMENTS

Aerial Applications

- Applicators are required to use a coarse or coarser droplet size (ASABE S572) or, if specifically using a spinning atomizer nozzle, applicators are required to use a volume mean diameter (VMD) of 385 microns or greater for release heights below 10 feet. Applicators are required to use a very coarse or coarser droplet size or, if specifically using a spinning atomizer nozzle, applicators are required to use a VMD of 475 microns or greater for release heights above 10 feet. Applicators must consider the effects of nozzle orientation and flight speed when determining droplet size.

- Applicators are required to use upwind swath displacement.
- The boom length must not exceed 60% of the wingspan or 90% of the rotor blade diameter to reduce spray drift.
- Applications with wind speeds less than 3 mph and with wind speeds greater than 10 mph are prohibited.
- Applications into temperature inversions are prohibited.

Ground Boom Applications

- Applicators are required to use a nozzle height below 4 feet above the ground or plant canopy and coarse or coarser droplet size (ASABE S572) or, if specifically using a spinning atomizer nozzle, applicators are required to use a volume mean diameter (VMD) of 385 microns or greater.
- Applications with wind speeds greater than 10 mph are prohibited.
- Applications into temperature inversions are prohibited.

Wind Erosion

Avoid treating powdery, dry or light sandy soils when conditions are favorable for wind erosion. Under these conditions, the soil surface should first be settled by rainfall or irrigation.

ADJUVANTS

Postemergence applications of Arsenal® PowerLine™ herbicide require the addition of a spray adjuvant for optimum herbicide performance.

Nonionic Surfactants. Use a nonionic surfactant (NIS) at the rate 0.25% volume/volume (v/v) or higher (see manufacturer's label) of the spray solution (0.25% v/v is equivalent to 1 quart in 100 gallons). For best results, select a nonionic surfactant with an HLB (hydrophilic to lipophilic balance) ratio between 12 and 17 with at least 70% surfactant in the formulated product (alcohols, fatty acids, oils, ethylene glycol or diethylene glycol should not be considered as surfactants to meet the above requirements).

Methylated Seed Oils (MSO) or Vegetable Oil Concentrates. Instead of a surfactant, a methylated seed oil or vegetable-based seed oil concentrate may be used at the rate of 1.5 to 2 pints per acre. When using spray volumes greater than 30 gallons per acre, methylated seed oil or vegetable-based seed oil concentrates should be mixed at a rate of 1% of the total spray volume, or alternatively use a nonionic surfactant as described above. Research indicates that these oils may aid in **Arsenal PowerLine** deposition and uptake by plants under moisture or temperature stress.

Silicone-based Surfactants. See manufacturer's label for specific rate recommendations. Silicone-based surfactants may reduce the surface tension of the spray droplet allowing greater spreading on the leaf surface as compared to conventional nonionic surfactants. However, some silicone-based surfactants may dry too quickly, limiting herbicide uptake.

Fertilizer/Surfactant Blends. Nitrogen-based liquid fertilizers, such as 28%N, 32%N, 10-34-0 or ammonium sulfate, may be added at the rate of 2 to 3 pints per acre in combination with the recommended rate of nonionic surfactant, methylated seed oil or vegetable/seed oil concentrate. The use of fertilizers in a tank mix without a nonionic surfactant, methylated seed oil or vegetable/seed oil concentrate is not recommended.

APPLICATION METHODS

AERIAL APPLICATIONS

All precautions must be taken to minimize or eliminate spray drift. Fixed-wing aircraft and helicopters can be used to apply **Arsenal PowerLine**. However, **DO NOT** make applications by fixed-wing aircraft unless appropriate buffer zones can be maintained to prevent spray drift out of the target area or, when treating open tracts of land, spray drift as a result of fixed-wing aircraft application can be tolerated. Aerial equipment designed to minimize spray drift, such as a helicopter equipped with a **Microfoil™ boom**, **Thru-Valve™ boom** or raindrop nozzles, must be used and calibrated. Except when applying with a **Microfoil boom**, a drift control agent may be added at the recommended label rate. Side trimming is not recommended with **Arsenal PowerLine** unless death of treated tree can be tolerated.

Uniformly apply the specified amount of **Arsenal PowerLine** in 2 or more gallons of water per acre. The actual minimum spray volume per acre is determined by the spray equipment used. Use adequate spray volume to provide accurate and uniform distribution of spray particles over the treated area and to avoid spray drift. Include in the spray solution a nonionic surfactant or methylated seed oil or manufacturer's label rate of a silicone-based surfactant (see the **ADJUVANTS** section of this label for specific recommendations). A foam-reducing agent may be added at the recommended label rate, if needed.

IMPORTANT. Thoroughly clean application equipment, including landing gear, immediately after use of this product. Prolonged exposure of this product to uncoated steel (except stainless steel) surfaces may result in corrosion and failure of the exposed part. The maintenance of an organic coating (paint) may prevent corrosion.

GROUND APPLICATIONS

Broadcast. Use 5 or more gallons of water per acre. The actual minimum spray volume per acre is determined by the spray equipment used. Use adequate spray volume to provide accurate and uniform distribution of spray particles over the treated area and to avoid spray drift. To minimize spray drift, select proper nozzles to avoid spraying a fine mist. Use pressures less than 50 psi, and **DO NOT** spray under gusty or windy conditions. Add a foam-reducing agent, if needed, and a spray pattern indicator, if desired, at the recommended label rates. Clean application equipment after using this product by thoroughly flushing with water.

When making applications to rights-of-way corridors where desirable tree roots may extend, use 1 to 3 pints of **Arsenal® PowerLine™ herbicide** per acre in combination with recommended tank mixes. Use rates higher than 3 pints per acre in these situations may cause injury or death of desirable trees when their roots extend into treated zones.

FOLIAR

Side Trimming
DO NOT side trim with **Arsenal PowerLine** unless severe injury or death of the treated tree can be tolerated. **Arsenal PowerLine** is readily translocated and can result in death of the entire tree.

Low-volume Foliar
Use equipment calibrated to deliver 5 to 20 gallons of spray solution per acre. To prepare the spray solution, thoroughly mix in water 0.5% to 5% **Arsenal PowerLine** plus surfactant (see the **ADJUVANTS** section of this label for specific recommendations). A foam-reducing agent may be applied at the recommended label rate, if needed. For control of difficult brush species (see **WEEDS CONTROLLED** section for relative susceptibility of weed species), use the higher concentrations of herbicide and/or spray volumes, but **DO NOT** apply more than 6 pints of **Arsenal PowerLine** per acre. Excessive wetting of foliage is not recommended. See the following mixing guide for some suggested volumes of **Arsenal PowerLine** and water.

BRUSH CONTROL

Use the specified rate of **Arsenal PowerLine** with the preferred application technique for the control of undesirable brush.

TANK MIXES AND APPLICATION RATES*

Target Vegetation	Rate of Arsenal® PowerLine™ herbicide	Tank Mix
Mixed hardwoods without elm, locust, or pine	1.0 to 1.5% by volume	Surfactant
Mixed hardwoods containing elm, locust, and pine	0.5 to 1.0% by volume	**Accord®** at 2 to 3% by volume plus surfactant
Mixed hardwoods with locust and pine, but no elm	0.5 to 1.0% by volume	**Krenite®** at 2 to 5% by volume plus surfactant
Mixed hardwoods with locust and elm, but no pine	0.5 to 1.0% by volume	**Escort®** at 2 ozs/acre or 2.3 grams/gallon plus surfactant

* Tank mixes with 2,4-D or products containing 2,4-D have resulted in reduced efficacy of **Arsenal PowerLine**.

MIXING CHART

% Solution	Arsenal PowerLine per Gallon of Mix (fl ozs)	Arsenal PowerLine per 4-gallon Backpack (fl ozs)
0.5%	0.6	2.6
1.0%	1.3	5.1
2.0%	2.6	10.2
3.0%	3.8	15.4
5.0%	6.4	25.6

MEASURING CHART		
128 fluid ounces	=	1 gallon
16 fluid ounces	=	1 pint
8 pints	=	1 gallon
4 quarts	=	1 gallon
2 pints	=	1 quart

Application Instructions. For low volume, select proper nozzles so that herbicide is not overapplied. Best results are achieved when the spray covers the crown and approximately 70% of the plant. The use of an even flat-fan tip with a spray angle of 40 degrees or less will aid in proper deposition.

Recommended tip sizes include 4004E or 1504E. For a straight stream and cone pattern, adjustable cone nozzles, such as 5500 X3 or 5500 X4, may be used. Attaching a roll-over valve onto a Spraying Systems Model 30 gunjet or other similar spray guns allows for the use of both a flat-fan and cone tips on the same gun.

Proper Spray Pattern. Moisten but **DO NOT** drench target vegetation causing spray solution to run off.

Low Volume with Backpacks. For brush up to 4-feet tall, spray down on the crown covering crown and penetrating approximately 70% of the plant.

For brush 4-feet to 8-feet tall, swipe the sides of target vegetation by directing spray to at least 2 sides of the plant in smooth vertical motions from the crown to the bottom. Make sure to cover the crown whenever possible.

For brush over 8-feet tall, lace sides of the brush by directing spray to at least 2 sides of the target in smooth zigzag motions from crown to bottom.

Low Volume with Hydraulic Handgun Application Equipment. Use same technique as described for **Low Volume with Backpacks**.

For broadcast applications, simulate a gentle rain near the top of target vegetation allowing spray to contact the crown and penetrate the target foliage without falling to the understory. Herbicide spray solution that contacts the understory may result in severe injury or death of plants in the understory.

SPRAY SOLUTION MIXING GUIDE FOR LOW-VOLUME APPLICATIONS

Amount of Spray Solution Prepared (gallons)	**Desired Concentration** (fluid volume)				
	0.5%	**0.75%**	**1%**	**1.5%**	**5%**
	(amount of Arsenal® PowerLine™ herbicide to use)				
1	0.6 fl oz	0.9 fl oz	1.3 fl ozs	1.9 fl ozs	6.5 fl ozs
3	1.9 fl ozs	2.8 fl ozs	3.8 fl ozs	5.8 fl ozs	1.2 pints
4	2.5 fl ozs	3.8 fl ozs	5.1 fl ozs	7.7 fl ozs	1.6 pints
5	3.2 fl ozs	4.8 fl ozs	6.5 fl ozs	9.6 fl ozs	2 pints
50	2 pints	3 pints	4 pints	6 pints	10 quarts
100	4 pints	6 pints	8 pints	6 quarts	5 gallons
2 tablespoons = 1 fluid ounce					

High-volume Foliar

For optimum performance when spraying medium-density to high-density brush, use equipment calibrated to deliver up to 100 gallons of spray solution per acre (GPA). Spray solutions exceeding 100 GPA may result in excessive spray runoff causing increased ground cover injury and injury to desirable species.

To prepare the spray solution, thoroughly mix **Arsenal PowerLine** at a rate of 2 to 6 pints per acre (see **GROUND APPLICATIONS** section) in water and add a surfactant (see **ADJUVANTS** section for specific recommendations and rates of surfactants). A foam-reducing agent may be added at the recommended label rate, if needed. For control of difficult species (see **WEEDS CONTROLLED** section for relative susceptibility of weed species), use the higher concentrations of herbicide and/or spray volumes, but **DO NOT** apply more than 6 pints of **Arsenal PowerLine** per acre. Uniformly cover the foliage of the vegetation to be controlled, but **DO NOT** apply to runoff. Excessive wetting of foliage is not recommended.

Tank Mixes for Brush Control

Arsenal PowerLine may be tank mixed with **Accord®**, **Banvel®**, **Escort®**, **Garlon® 3A**, **Krenite®**, **Roundup®**, **Telar®**, **Tordon® K**, and **Vanquish®** to provide control of **Arsenal PowerLine**-tolerant species.

Consult manufacturer's labels for specific rates and weeds controlled. Always follow the more restrictive label when making an application involving tank mixes. Tank mixing with 2,4-D, or products which contain 2,4-D, has resulted in reduced performance of **Arsenal PowerLine**.

Invert Emulsions. Arsenal PowerLine can be applied as an invert emulsion. The spray solution results in an invert (water-in-oil) spray emulsion designed to minimize spray drift and spray runoff resulting in more herbicide on the target foliage. The spray emulsion may be formed in a single tank (batch mixing) or injected (in-line mixing). Consult the invert chemical label for proper mixing directions.

CUT SURFACE

Cut Stubble

Arsenal® PowerLine™ herbicide can be applied within 2 weeks after mechanical mowing or cutting of brush. To suppress or control resprouting, uniformly apply a spray solution of **Arsenal PowerLine** at the rate of 1 to 2 pints per acre to the cut area. **Arsenal PowerLine** may be tank mixed with **Tordon® K** or picloram to aid in control or suppression of brush. The addition of 5% (v/v) or more of a penetrating agent can aid in uptake through the bark or exposed roots.

Cut stubble applications are made to the soil and cut brush stumps. This type of application may increase ground cover injury. However, vegetation will recover. Making applications of **Arsenal PowerLine** directly to the soil can increase potential root uptake causing injury or death of desirable trees.

Efficacy can be increased, and root uptake by desirable vegetation can be decreased, if the brush is allowed to regrow and the foliage is treated. See the **APPLICATION METHODS** section of this label.

Stump and Cut-stem Treatments

Arsenal PowerLine may be used to control undesirable woody vegetation on noncropland by applying the **Arsenal PowerLine** solution to the cambium area of freshly cut stump surfaces or to fresh cuts on the stem of the target woody vegetation. Applications can be made at any time of the year except during periods of heavy sap flow in the spring. **DO NOT** overapply solution causing runoff or puddling.

Mixing. Arsenal PowerLine may be mixed as either a concentrated or dilute solution for stump and cut stem treatments. The dilute solution may be used for applications to the surface of the stump or to cuts on the stem of the target woody vegetation. Concentrated solutions may be used for applications to cuts on the stem. Use of the concentrated solution permits application to fewer cuts on the stem, especially for large-diameter trees. Follow the application instructions to determine proper application techniques for each type of solution.

To prepare a dilute solution, mix 8 to 12 fluid ounces of **Arsenal PowerLine** with 1 gallon of water. If temperatures are such that freezing of the spray mixture may occur, antifreeze (ethylene glycol) may be used according to manufacturer's label to prevent freezing. The use of a surfactant or penetrating agent may improve uptake through partially callused cambiums. To prepare a concentrated solution, mix 2 quarts of **Arsenal PowerLine** with no more than 1 quart of water.

Application with Dilute Solutions

For cut stump treatments. Spray or brush the solution onto the cambium area of the freshly cut stump surface. Ensure that the solution thoroughly wets the entire cambium area (the wood next to the bark of the stump).

For tree-injection treatments. Using standard injection equipment, apply 1 milliliter of solution at each injection site around the tree with no more than 1-inch intervals between cut edges. Ensure that the injector completely penetrates the bark at each injection site.

For frill or girdle treatments. Using a hatchet, machete, or similar device, make cuts through the bark at intervals around the tree with no more than 2-inch intervals between cut edges. Spray or brush the solution into each cut until thoroughly wet.

Application with Concentrated Solutions

For tree injection treatments. Using standard injection equipment, apply 1 milliliter of solution at each injection site. Make at least 1 injection cut for every 3 inches of Diameter at Breast Height (DBH) on the target tree. For example, a 3-inch DBH tree will receive 1 injection cut, and a 6-inch DBH tree will receive 2 injection cuts. On trees requiring more than 1 injection site, place the injection cuts at approximately equal intervals around the tree.

For frill or girdle treatments. Using a hatchet, machete, or similar device, make cuts through the bark at approximately equal intervals around the tree. Make at least 1 cut for every 3 inches of DBH on the target tree. For example, a 3-inch DBH tree will receive 1 cut, and a 6-inch DBH tree will receive 2 cuts. Spray or brush the solution into each cut until thoroughly wet.

NOTE: Injury may occur to desirable woody plants if the shoots extend from the same root system or their root systems are grafted to those of the treated tree.

FOR CONTROL OF UNDESIRABLE WEEDS UNDER PAVED SURFACES

Arsenal PowerLine can be used under asphalt, pond liners and other paved areas ONLY in industrial sites or where the pavement has a suitable barrier along the perimeter that prevents encroachment of roots of desirable plants.

Arsenal PowerLine should be used only where the area to be treated has been prepared according to good construction practices. If rhizomes, stolons, tubers or other vegetative plant parts are present in the site, they should be removed by scalping with a grader blade to a depth sufficient to insure their complete removal.

IMPORTANT. Paving should follow **Arsenal PowerLine** applications as soon as possible. **DO NOT** apply where the chemical may contact the roots of desirable trees or other plants.

The product may not be used under pavement on residential properties such as driveways or parking lots, nor in recreational areas such as under bike or jogging paths, golf-cart paths, or tennis courts, or where landscape plantings could be anticipated. Injury or death of desirable plants may result if this product is applied where roots are present or where they may extend into the treated area. Roots of trees and shrubs may extend a considerable distance beyond the branch extremities or drip line.

APPLICATION DIRECTIONS FOR USE UNDER PAVED SURFACES

Applications should be made to the soil surface only when final grade is established. **DO NOT** move soil following **Arsenal® PowerLine™ herbicide** application.

Apply **Arsenal PowerLine** in sufficient water (at least 100 gallons per acre) to ensure thorough and uniform wetting of the soil surface, including the shoulder areas. Add **Arsenal PowerLine** at a rate of 6 pints per acre (2.2 fl ozs per 1000 square feet) to clean water in the spray tank during the filling operation. Agitate before spraying.

If the soil is not moist prior to treatment, incorporation of **Arsenal PowerLine** is needed for herbicide activation. **Arsenal PowerLine** can be incorporated into the soil to a depth of 4 to 6 inches using a rototiller or disc. Rainfall or irrigation of 1 inch will also provide uniform incorporation. **DO NOT** allow treated soil to wash or move into untreated areas.

FOR CONTROL OF UNDESIRABLE WEEDS IN UNIMPROVED BERMUDAGRASS AND BAHIAGRASS

Arsenal PowerLine may be used on unimproved Bermudagrass and Bahiagrass turf on roadsides, utility rights-of-way and other noncropland industrial sites. The application of **Arsenal PowerLine** on established common and coastal Bermudagrass and Bahiagrass provides control of labeled broadleaf and grass weeds. Competition from these weeds is eliminated, releasing the Bermudagrass and Bahiagrass. Treatment of Bermudagrass with **Arsenal PowerLine** results in a compacted growth habit and seedhead inhibition.

Uniformly apply with properly calibrated ground equipment using at least 10 gallons of water per acre with a spray pressure 20 to 50 psi.

IMPORTANT. Temporary yellowing of grass may occur when treatment is made after growth commences.
DO NOT add surfactant in excess of the recommended rate (1 fl oz per 25 gallons of spray solution).
DO NOT APPLY to grass during its first growing season.
DO NOT APPLY to grass that is under stress from drought, disease, insects, or other causes.

DOSAGE RATES AND TIMING

BERMUDAGRASS

Apply **Arsenal PowerLine** at 6 fl ozs to 12 fl ozs per acre when the Bermudagrass is dormant. Apply **Arsenal PowerLine** at 6 fl ozs to 8 fl ozs per acre after the Bermudagrass has reached full greenup. Applications made during greenup will delay greenup. Include a surfactant in the spray solution (see preceding **IMPORTANT** statements).

For additional preemergence control of annual grasses and small-seeded broadleaf weeds, add **Pendulum® AquaCap™ herbicide** at the rate of 2.1 to 4.2 quarts per acre. Consult the **Pendulum** label for weeds controlled and for other use directions and precautions.

For control of Johnsongrass in Bermudagrass turf, apply **Arsenal PowerLine** at 8 fl ozs per acre plus **Roundup® herbicide** at 12 fl ozs per acre plus surfactant. For additional control of broadleaves and vines, **Garlon® 3A** may be added to the above mix at the rate of 1 to 2 pints per acre. Observe all precautions and restrictions on the **Garlon 3A** and **Roundup** labels.

BAHIAGRASS

Apply **Arsenal PowerLine** at 4 fl ozs to 8 fl ozs per acre when the Bahiagrass is dormant or after the grass has initiated greenup but has not exceeded 25% greenup. Include in the spray solution a surfactant (see **ADJUVANTS** section for specific recommendations on surfactants).

Weeds Controlled in Unimproved Bermudagrass and Bahiagrass

Bedstraw*	*Gallium* spp.
Bishopweed*	*Ptilimnium capillaceum*
Buttercup*	*Ranunculus parviflorus*
Carolina geranium	*Geranium carolinianum*
Fescue	*Festuca* spp.
Foxtail	*Setaria* spp.
Little barley	*Hordeum pusillum*
Seedling Johnsongrass	*Sorghum halepense*
White clover	*Trifolium repens*
Wild carrot	*Daucus carota*
Yellow woodsorrel	*Oxalis stricta*

* Use not permitted in California unless otherwise directed by supplemental labeling.

GRASS GROWTH AND SEEDHEAD SUPPRESSION

Arsenal PowerLine may be used to suppress growth and seedhead development of certain turfgrass in unimproved areas. When applied to desirable turf, **Arsenal PowerLine** may result in temporary turf damage and/or discoloration. Effects to the desirable turf may vary with environmental conditions. For optimum performance, application should be made prior to culm elongation. Applications may be made before or after mowing. If applied prior to mowing, allow at least 3 days of active growth before mowing. If following a mowing, allow sufficient time for the grasses to recover before applying this product or injury may be amplified.

DO NOT APPLY to turf under stress (drought, cold, insect damaged, etc.) or severe injury or death may occur.

BERMUDAGRASS

Apply **Arsenal PowerLine** at 6 fl ozs to 8 fl ozs per acre from early greenup to prior to seedhead initiation. **DO NOT** add a surfactant for this application.

COOL SEASON UNIMPROVED TURF

Apply **Arsenal PowerLine** at 2 fl ozs per acre plus 0.25% nonionic surfactant. For increased suppression, **Arsenal PowerLine** may be tank mixed with such products as **Campaign®** (24 ozs per acre) or **Embark®** (8 ozs per acre).

Tank mixes may increase injury to desired turf. Consult each product label for recommended turf species and other use directions and precautions. Tank mixes with 2,4-D or products containing 2,4-D may decrease the effectiveness of **Arsenal® PowerLine™ herbicide**.

TOTAL VEGETATION CONTROL WHERE BARE GROUND IS DESIRED

Arsenal PowerLine is an effective herbicide for preemergence or postemergence control of many annual and perennial broadleaf and grass weeds where bare ground is desired. **Arsenal PowerLine** is particularly effective on hard-to-control perennial grasses. **Arsenal PowerLine** at 1.5 pints to 6 pints per acre can be used alone or in tank mix with herbicides such as **Banvel®**, **Finale®**, **Karmex®**, **Oust®**, **Pendulum®**, **Roundup®**, simazine, or **Vanquish®**. The degree and duration of control are dependent on the rate of **Arsenal PowerLine** used, tank mix partner, the volume of carrier, soil texture, rainfall and other conditions.

Consult manufacturers labels for specific rates and weeds controlled. Always follow the more restrictive label when making an application involving tank mixes.

TANK MIX INSTRUCTIONS FOR BARE GROUND

Herbicide Rates per Acre*

Arsenal PowerLine	Pendulum® AquaCap™ herbicide	Pendulum® 3.3 EC herbicide	Diuron
(pints)	(quarts)	(quarts)	(lbs ai)
1.5 to 3	4.2	4.8	4 to 6
2 to 4	4.2	4.8	6 to 10
3 to 6	4.2	4.8	8 to 12

* Use higher rates for fall applications and in areas that have not been previously treated or that feature heavy infestations.

Applications of **Arsenal PowerLine** may be made at any time of the year. Use equipment calibrated to deliver desired gallons per acre spray volume and uniformly distribute the spray pattern over the treated area.

Postemergence Applications. Always use a spray adjuvant (see **ADJUVANTS** section of this label) when making a postemergence application. For optimum performance on tough-to-control annual grasses, applications should be made at a total volume of 100 gallons per acre or less. For quicker burndown or brown-out of target weeds, **Arsenal PowerLine** may be tank mixed with products such as **Finale** or **Roundup**. Tank mixes with 2,4-D or products containing 2,4-D have reduced performance of **Arsenal PowerLine**. Always follow the more restrictive label when tank mixing.

SPOT TREATMENTS

Arsenal PowerLine may be used as a follow-up treatment to control escapes or weed encroachment in a bareground situation. To prepare the spray solution, thoroughly mix in each gallon of water 0.5% to 5% **Arsenal PowerLine** plus an adjuvant. For increased burndown, include **Finale** or **Roundup**, or similar products. For added residual weed control or to increase the weed spectrum, add **Pendulum** or diuron. Always follow the more restrictive label when tank mixing.

FOR SPOT TREATMENT WEED CONTROL IN GRASS PASTURE AND RANGELAND

For the control of undesirable vegetation in grass pasture and rangeland, **Arsenal PowerLine** may be applied as a spot treatment at a rate of 2 fl ozs to 48 fl ozs of product per treated acre using any of the described ground application methods. Spot applications to grass pasture and rangeland may not exceed more than 1/10 of the area to be grazed or cut for hay. See appropriate sections of this label for specific use directions for the application method and vegetation control desired. **DO NOT** apply more than 48 fl ozs per acre per year.

GRAZING AND HAYING RESTRICTIONS

There are no grazing restrictions following **Arsenal PowerLine** application. **DO NOT** cut forage grass for hay for 7 days after **Arsenal PowerLine** application.

INSTRUCTIONS FOR RANGELAND USE

Arsenal PowerLine may be applied to rangeland for the control of undesirable vegetation to achieve 1 or more of the following vegetation management objectives:

1. To control undesirable (nonnative, invasive and noxious) plant species
2. To control undesirable vegetation to aid in the establishment of desirable rangeland plant species
3. To control undesirable vegetation to aid in the establishment of desirable rangeland vegetation following a fire
4. To control undesirable vegetation to reduce wildfire fuel
5. To release existing desirable rangeland plant communities from the competitive pressure of undesirable plant species
6. To control undesirable vegetation to improve wildlife habitat

To ensure the protection of threatened and endangered plants when applying **Arsenal PowerLine** to rangeland:

1. Federal agencies must follow NEPA regulations to ensure protection of threatened and endangered plants.
2. State agencies must work with the Fish and Wildlife Service or the Service's designated state conservation agency to ensure protection of threatened and endangered plants.
3. Other organizations or individuals must operate under a Habitat Conservation Plan if threatened or endangered plants are known to be present on the land to be treated.

See the appropriate section(s) of this label for specific use directions for the desired rangeland vegetation management objective.

Arsenal PowerLine should only be applied to a given rangeland acre as specific weed problems arise. Long-term control of undesirable weed species ultimately depends on

the successful use of land management practices that promote the growth and sustainability of desirable rangeland plant species.

ROTATIONAL CROP INSTRUCTIONS

Rotational crops may be planted 12 months after applying **Arsenal® PowerLine™ herbicide** at the specified pasture and rangeland rate. Following 12 months after an **Arsenal PowerLine** application and before planting any crop, a successful field bioassay must be completed. The field bioassay consists of a test strip of the intended rotational crop planted in the previously treated area in the grass pasture/rangeland and grown to maturity. The test strip should include low areas and knolls, and include variations in soil type and pH within the treated area. If no crop injury is evident in the test strip, the intended rotational crop may be planted the following year.

Use of **Arsenal PowerLine** in accordance with label directions is expected to result in normal growth of rotational crops in most situations; however, various environmental and agronomic factors make it impossible to eliminate all risks associated with the use of this product and, therefore, rotational crop injury is always possible.

WEEDS CONTROLLED

Arsenal PowerLine will provide preemergence or postemergence control with residual control of the following target vegetation species at the rates listed. Residual control refers to control of newly germinating seedlings in both annuals and perennials. In general, annual weeds may be controlled by preemergence or postemergence applications of **Arsenal PowerLine**.

For established biennials and perennials, postemergence applications of Arsenal PowerLine are recommended. The rates shown below pertain to broadcast applications and indicate the relative sensitivity of these weeds. The relative sensitivity should be referenced when preparing low-volume spray solutions (see **Low-volume Foliar** section of **GROUND APPLICATIONS**); low-volume applications may provide control of the target species with less **Arsenal PowerLine** per acre than is shown for the broadcast treatments. **Arsenal PowerLine** may be used only in accordance with the instructions on this label.

RESISTANT BIOTYPES

Naturally occurring biotypes (a plant within a given species that has a slightly different but distinct genetic makeup from other plants of the same species) of some weeds listed on this label may not be effectively controlled by this and/or other herbicides (**Oust®**) with the ALS/AHAS enzyme-inhibiting mode of action. If naturally occurring ALS/AHAS-resistant biotypes are present in an area, **Arsenal PowerLine** should be tank mixed or applied sequentially with an appropriate registered herbicide having a different mode of action to ensure control.

Weeds Controlled

GRASSES

Common Name	Species	Growth Habit[2]
	Apply 2 to 3 pints per acre[1]	
Annual bluegrass	(*Poa annua*)	A
Broadleaf signalgrass	(*Brachiaria platyphylla*)	A
Canada bluegrass	(*Poa compressa*)	P
Downy brome	(*Bromus tectorum*)	A
Fescue	(*Festuca* spp.)	A/P
Foxtail	(*Setaria* spp.)	A
Italian ryegrass	(*Lolium multiflorum*)	A
Johnsongrass	(*Sorghum halepense*)	P
Kentucky bluegrass	(*Poa pratensis*)	P
Lovegrass	(*Eragrostis* spp.)	A/P
Orchardgrass	(*Dactylis glomerata*)	P
Paragrass	(*Brachiaria mutica*)	P
Quackgrass	(*Agropyron repens*)	P
Sandbur	(*Cenchrus* spp.)	A
Sand dropseed	(*Sporobolus cryptandrus*)	A
Smooth brome	(*Bromus inermis*)	P
Vaseygrass	(*Paspalum urvillei*)	P
Wild oats	(*Avena fatua*)	A
Witchgrass	(*Panicum capillare*)	A
	Apply 3 to 4 pints per acre[1]	
Barnyardgrass[3]	(*Echinochloa crus-galli*)	A
Beardgrass	(*Andropogon* spp.)	P
Bluegrass, annual[3]	(*Poa annua*)	A
Cheat	(*Bromus secalinus*)	A
Crabgrass	(*Digitaria* spp.)	A
Crowfootgrass[3]	(*Dactyloctenium aegyptium*)	A
Fall panicum	(*Panicum dichotomiflorum*)	A
Giant reed	(*Arundo donax*)	P
Goosegrass	(*Eleusine indica*)	A
Itchgrass[3]	(*Rottboellia exaltata*)	A
Junglerice[3]	(*Echinochloa colonum*)	A
Lovegrass[3]	(*Eragrostis* spp.)	A
Maidencane	(*Panicum hemitomon*)	A
Panicum, browntop[3]	(*Panicum fasciculatum*)	A
Panicum, Texas[3]	(*Panicum texanum*)	A
Prairie threeawn	(*Aristida oligantha*)	P
Reed canarygrass	(*Phalaris arundinacea*)	P
Sandbur, field[3]	(*Cenchrus incertus*)	A
Signalgrass[3]	(*Brachiaria* spp.)	A
Torpedograss	(*Panicum repens*)	P
Wild barley	(*Hordeum* spp.)	A
Wooly cupgrass[3]	(*Eriochloa villosa*)	A

GRASSES *(continued)*

Common Name	Species	Growth Habit[2]
	Apply 4 to 6 pints per acre[1]	
Bahiagrass	(*Paspalum notatum*)	P
Bermudagrass[4]	(*Cynodon dactylon)*	P
Big bluestem	(*Andropogon gerardii)*	P
Cattail	(*Typha* spp.)	P
Cogongrass	(*Imperata cylindrica*)	P
Dallisgrass	(*Paspalum dilatatum*)	P
Feathertop	(*Pennisetum villosum*)	P
Guineagrass	(*Panicum maximum*)	P
Phragmites	(*Phragmites australis*)	P
Prairie cordgrass	(*Spartina pectinata*)	P
Saltgrass[4]	(*Distichlis stricta*)	P
Sand dropseed	(*Sporobolus cryptandrus*)	P
Sprangletop[3]	(*Leptochloa* spp.)	A
Timothy	(*Phleum pratense*)	P
Wirestem muhly	(*Muhlenbergia frondosa*)	P

BROADLEAF WEEDS

	Apply 2 to 3 pints per acre[1]	
African rue[10]	(*Peganum harmala*)	P
Alligatorweed	(*Alternanthera philoxeroides*)	A/P
Burdock	(*Arctium* spp.)	B
Carolina geranium	(*Geranium carolinianum*)	A
Carpetweed	(*Mollugo verticillata*)	A
Clover	(*Trifolium* spp.)	A/P
Common chickweed	(*Stellaria media*)	A
Common ragweed	(*Ambrosia artemisiifolia*)	A
Dandelion	(*Taraxacum officinale*)	P
Dogfennel	(*Eupatorium capillifolium*)	A
Filaree	(*Erodium* spp.)	A
Fleabane	(*Erigeron* spp.)	A
Hoary vervain	(*Verbena stricta*)	P
Indian mustard	(*Brassica juncea*)	A
Kochia[5]	(*Kochia scoparia*)	A
Lambsquarters	(*Chenopodium album*)	A
Lespedeza	(*Lespedeza* spp.)	P
Miners lettuce	(*Montia perfoliata*)	A
Mullein	(*Verbascum* spp.)	B
Nettleleaf goosefoot	(*Chenopodium murale*)	A
Oxeye daisy	(*Chrysanthemum leucanthemum*)	P
Pepperweed	(*Lepidium* spp.)	A
Pigweed	(*Amaranthus* spp.)	A
Puncturevine	(*Tribulus terrestris*)	A
Russian thistle	(*Salsola kali*)	A

BROADLEAF WEEDS *(continued)*

Common Name	Species	Growth Habit[2]
	Apply 2 to 3 pints per acre[1] *(continued)*	
Smartweed	(*Polygonum* spp.)	A
Sorrell	(*Rumex* spp.)	P
Sunflower	(*Helianthus* spp.)	A
Sweet clover	(*Melilotus* spp.)	A
Tansymustard	(*Ambrosia psilostachya*)	P
Wild carrot	(*Daucus carota*)	B
Wild lettuce	(*Lactuca* spp.)	A/B
Wild parsnip	(*Pastinaca sativa*)	B
Wild turnip	(*Brassica campestris*)	B
Woollyleaf bursage	(*Franseria tomentosa*)	P
Yellow woodsorrel	(*Oxalis stricta*)	P
	Apply 3 to 4 pints per acre[1]	
Broom snakeweed[6]	(*Gutierrezia sarothrae*)	P
Bull thistle	(*Cirsium vulgare*)	B
Burclover[3]	(*Medicago* spp.)	A
Chickweed, mouseear[5]	(*Cerastium vulgatum*)	A
Clover, hop[3]	(*Trifolium procumbens*)	A
Cocklebur	(*Xanthium strumarium*)	A
Cudweed[3]	(*Gnaphalium* spp.)	A
Desert camelthorn	(*Alhagi pseudalhagi*)	P
Diffuse knapweed	(*Centaurea diffusa*)	A
Dock	(*Rumex* spp.)	P
Fiddleneck[3]	(*Amsinckia intermedia*)	A
Goldenrod	(*Solidago* spp.)	P
Henbit[3]	(*Lamium amplexicaule*)	A
Knotweed, prostrate[3]	(*Polygonum aviculare*)	A/P
Pokeweed	(*Phytolacca americana*)	P
Purple loosestrife[6]	(*Lythrum salicaria*)	P
Purslane	(*Portulaca* spp.)	A
Pusley, Florida[3]	(*Richardia scabra*)	A
Rocket, London[3]	(*Sisymbrium irio*)	A
Rush skeletonweed[6]	(*Chondrilla juncea*)	B
Saltbush	(*Atriplex* spp.)	A
Shepherdspurse[3]	(*Capsella bursa-pastoris*)	A
Spurge, annual[3]	(*Euphorbia* spp.)	A
Stinging nettle[6]	(*Urtica dioica*)	P
Velvetleaf[3]	(*Abutilon theophrasti*)	A
Yellow starthistle	(*Centaurea solstitialis*)	A

BROADLEAF WEEDS *(continued)*

Common Name	Species	Growth Habit[2]
	Apply 4 to 6 pints per acre[1]	
Arrowwood	(*Pluchea sericea*)	A
Canada thistle	(*Cirsium arvense*)	P
Giant ragweed	(*Ambrosia trifida*)	A
Grey rabbitbrush	(*Chrysothamnus nauseosus*)	P
Japanese bamboo/knotweed	(*Polygonum cuspidatum*)	P
Little mallow	(*Malva parviflora*)	B
Milkweed	(*Asclepias* spp.)	P
Primrose	(*Oenothera kunthiana*)	P
Russian knapweed	(*Centaurea repens*)	P
Sago pondweed[10]	(*Potamogeton pectinatus*)	P
Silverleaf nightshade	(*Solanum elaeagnifolium*)	P
Sowthistle	(*Sonchus* spp.)	A
Texas thistle	(*Cirsium texanum*)	P

VINES AND BRAMBLES

	Apply 1 pint per acre	
Field bindweed	(*Convolvulus arvensis*)	P
Hedge bindweed	(*Calystegia sepium*)	A
	Apply 2 to 3 pints per acre[1]	
Wild buckwheat	(*Polygonum convolvulus*)	P
	Apply 3 to 4 pints per acre[1]	
Greenbriar	(*Smilax* spp.)	P
Honeysuckle	(*Lonicera* spp.)	P
Morningglory	(*Ipomoea* spp.)	A/P
Poison ivy	(*Rhus radicans*)	P
Redvine	(*Brunnichia cirrhosa*)	P
Wild rose	(*Rosa* spp.)	P
including: Multiflora rose	(*Rosa multiflora*)	P
Macartney rose	(*Rosa bracteata*)	P
	Apply 4 to 6 pints per acre[1]	
Kudzu[4]	(*Pueraria lobata*)	P
Trumpetcreeper	(*Campsis radicans*)	P
Virginia creeper	(*Parthenocissus quinquefolia*)	P
Wild grape	(*Vitis* spp.)	P

BRUSH SPECIES

Apply 4 to 6 pints per acre[1]

Common Name	Species	Growth Habit[2]
American beech	(*Fagus grandifolia*)	P
Ash	(*Fraxinus* spp.)	P
Bald cypress	(*Taxodium distichum*)	P
Bigleaf maple	(*Acer macrophyllum*)	P
Blackgum	(*Nyssa sylvatica*)	P
Black locust[7]	(*Robinia pseudoacacia*)	P
Boxelder	(*Acer negundo*)	P
Brazilian peppertree	(*Schinus terebinthifolius*)	P
Cherry	(*Prunus* spp.)	P
Chinaberry	(*Melia azedarach*)	P
Chinese tallow-tree	(*Sapium sebiferum*)	P
Dogwood	(*Cornus* spp.)	P
Elm[8]	(*Ulmus* spp.)	P
Hawthorn	(*Crataegus* spp.)	P
Hickory	(*Carya* spp.)	P
Honeylocust[9]	(*Gleditsia triacanthos*)	P
Maple	(*Acer* spp.)	P
Melaleuca	(*Melaleuca quinquenervia*)	P
Mulberry	(*Morus* spp.)	P
Oak	(*Quercus* spp.)	P
Persimmon	(*Diospyros virginiana*)	P
Poplar	(*Populus* spp.)	P
Privet	(*Ligustrum vulgare*)	P
Red alder	(*Alnus rubra*)	P
Red maple	(*Acer rubrum*)	P
Russian olive	(*Elaeagnus angustifolia*)	P
Saltcedar	(*Tamarix ramosissima*)	P
Sassafras	(*Sassafras albidum*)	P
Sourwood	(*Oxydendrum arboreum*)	P
Sumac	(*Rhus* spp.)	P
Sweetgum	(*Liquidambar styraciflua*)	P
Willow	(*Salix* spp.)	P
Yellow poplar	(*Liriodendron tulipifera*)	P

[1] The higher rates should be used where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] For preemergence control, tank mix with **Pendulum® herbicide**.
[4] Use a minimum of 75 GPA; control of established stands may require repeat applications.
[5] For preemergence control, tank mix with **Karmex®**, **Pendulum**, or diuron.
[6] For best results, early postemergence applications are required.
[7] Tank mix with **Accord®**, **Escort®**, **Garlon® 3A**, **Krenite®**, **Roundup®**, or **Tordon® K**.
[8] Tank mix with **Accord**, **Escort**, or **Roundup**.
[9] Tank mix with **Accord**, **Garlon 3A**, **Roundup**, or **Tordon K**.
[10] Use not permitted in California unless otherwise directed by supplemental labeling.

Conditions of Sale and Warranty

The **Directions For Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and must be followed carefully. However, 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 weather conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF") or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer.

BASF warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above.

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TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BASF AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, EXEMPLARY, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

BASF and the Seller offer this product, and the Buyer and User accept it, subject to the foregoing **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of BASF. 1108

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BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
The Chemical Company

Safety Data Sheet
ARSENAL POWERLINE HERBICIDE

1. Identification

Product identifier used on the label

ARSENAL POWERLINE HERBICIDE

Recommended use of the chemical and restriction on use
Recommended use*: herbicide

* The “Recommended use” identified for this product is provided solely to comply with a Federal requirement and is not part of the seller's published specification. The terms of this Safety Data Sheet (SDS) do not create or infer any warranty, express or implied, including by incorporation into or reference in the seller's sales agreement.

Details of the supplier of the safety data sheet

Company:
BASF CORPORATION
100 Park Avenue
Florham Park, NJ 07932, USA

Telephone: +1 973 245-6000

Emergency telephone number

CHEMTREC: 1-800-424-9300
BASF HOTLINE: 1-800-832-HELP (4357)

Other means of identification

Substance number:	234359
EPA Registration number:	241-431
Molecular formula:	C(13) H(15) N(3) O(3). C(3) H(9) N
Chemical family:	imidazole derivative
Synonyms:	Isopropylamine salt of imazapyr

2. Hazards Identification

According to Regulation 2012 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

Classification of the product

Skin Sens.	1	Skin sensitization

Label elements

Pictogram:

Signal Word:
Warning

Hazard Statement:

H317	May cause an allergic skin reaction.

Precautionary Statements (Prevention):

P280	Wear protective gloves.
P261	Avoid breathing dust/fume/gas/mist/vapours/spray.
P272	Contaminated work clothing should not be allowed out of the workplace.

Precautionary Statements (Response):

P303 + P352	IF ON SKIN (or hair): Wash with plenty of soap and water.
P333 + P311	If skin irritation or rash occurs: Call a POISON CENTER or doctor/physician.
P362 + P364	Take off contaminated clothing and wash it before reuse.

Precautionary Statements (Disposal):

P501	Dispose of contents/container to hazardous or special waste collection point.

According to Regulation 1994 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

Emergency overview

CAUTION:
May cause moderate but temporary irritation to the eyes.
Prolonged or repeated skin contact may cause sensitization or allergic reactions.
HARMFUL IF SWALLOWED.
KEEP OUT OF REACH OF CHILDREN.
KEEP OUT OF REACH OF DOMESTIC ANIMALS.
Avoid contact with the skin, eyes and clothing.
Avoid inhalation of mists/vapours.

3. Composition / Information on Ingredients

According to Regulation 2012 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

CAS Number	Weight %	Chemical name
81510-83-0	26.7 %	imazapyr isopropylamine salt

According to Regulation 1994 OSHA Hazard Communication Standard; 29 CFR Part 1910.1200

CAS Number	Weight %	Chemical name
81510-83-0	26.7 %	imazapyr isopropylamine salt
	73.3 %	Proprietary ingredients

4. First-Aid Measures

Description of first aid measures

General advice:
Remove contaminated clothing.

If inhaled:
Keep patient calm, remove to fresh air, seek medical attention.

If on skin:
Wash thoroughly with soap and water.

If in eyes:
Wash affected eyes for at least 15 minutes under running water with eyelids held open.

If swallowed:
Immediately rinse mouth and then drink 200-300 ml of water, seek medical attention.

Most important symptoms and effects, both acute and delayed

Symptoms: The most important known symptoms and effects are described in the labelling (see section 2) and/or in section 11., Further important symptoms and effects are so far not known.

Indication of any immediate medical attention and special treatment needed

Note to physician

Treatment:	Treat according to symptoms (decontamination, vital functions), no known specific antidote.

5. Fire-Fighting Measures

Extinguishing media

Suitable extinguishing media:
foam, dry powder, carbon dioxide, water spray

Special hazards arising from the substance or mixture

Hazards during fire-fighting:
carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons,
If product is heated above decomposition temperature, toxic vapours will be released. The substances/groups of substances mentioned can be released if the product is involved in a fire.

Advice for fire-fighters

Protective equipment for fire-fighting:
Firefighters should be equipped with self-contained breathing apparatus and turn-out gear.

Further information:
In case of fire and/or explosion do not breathe fumes. Keep containers cool by spraying with water if exposed to fire. Collect contaminated extinguishing water separately, do not allow to reach sewage or effluent systems. Dispose of fire debris and contaminated extinguishing water in accordance with official regulations.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

Take appropriate protective measures. Clear area. Shut off source of leak only under safe conditions. Extinguish sources of ignition nearby and downwind. Ensure adequate ventilation. Wear suitable personal protective clothing and equipment.

Environmental precautions

Do not discharge into the subsoil/soil. Do not discharge into drains/surface waters/groundwater. Contain contaminated water/firefighting water.

Methods and material for containment and cleaning up

Dike spillage. Pick up with suitable absorbent material. Place into suitable containers for reuse or disposal in a licensed facility. Spilled substance/product should be recovered and applied according to label rates whenever possible. If application of spilled substance/product is not possible, then spills should be contained, solidified, and placed in suitable containers for disposal. After decontamination, spill area can be washed with water. Collect wash water for approved disposal.

7. Handling and Storage

Precautions for safe handling

RECOMMENDATIONS ARE FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS. PESTICIDE APPLICATORS & WORKERS must refer to the Product Label and Directions for Use attached to the product for Agricultural Use Requirements in accordance with the EPA Worker Protection Standard 40 CFR part 170. Ensure adequate ventilation. Provide good ventilation of working area (local exhaust ventilation if necessary). Keep away from sources of ignition - No smoking. Keep container tightly sealed. Protect contents from the effects of light. Protect against heat. Protect from air. Handle and open container with care. Do not open until ready to use. Once container is opened, content should be used as soon as possible. Avoid aerosol formation. Avoid dust formation. Provide means for controlling leaks and spills. Do not return residues to the storage containers. Follow label warnings even after container is emptied. The substance/ product may be handled only by appropriately trained personnel. Avoid all direct contact with the substance/product. Avoid contact with the skin, eyes and clothing. Avoid inhalation of dusts/mists/vapours. Wear suitable personal protective clothing and equipment.

Protection against fire and explosion:
The relevant fire protection measures should be noted. Fire extinguishers should be kept handy. Avoid all sources of ignition: heat, sparks, open flame. Sources of ignition should be kept well clear. Avoid extreme heat. Keep away from oxidizable substances. Electrical equipment should conform to national electric code. Ground all transfer equipment properly to prevent electrostatic discharge. Electrostatic discharge may cause ignition.

Conditions for safe storage, including any incompatibilities

Segregate from incompatible substances. Segregate from foods and animal feeds. Segregate from textiles and similar materials.

Further information on storage conditions: Keep only in the original container in a cool, dry, well-ventilated place away from ignition sources, heat or flame. Protect containers from physical damage. Protect against contamination. The authority permits and storage regulations must be observed.

8. Exposure Controls/Personal Protection

Users of a pesticidal product should refer to the product label for personal protective equipment requirements.

Advice on system design:
Whenever possible, engineering controls should be used to minimize the need for personal protective equipment.

Personal protective equipment

RECOMMENDATIONS FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS:

Respiratory protection:
Wear respiratory protection if ventilation is inadequate. Wear a NIOSH-certified (or equivalent) TC23C Chemical/Mechanical type filter system to remove a combination of particles, gas and vapours. For situations where the airborne concentrations may exceed the level for which an air purifying respirator is effective, or where the levels are unknown or Immediately Dangerous to Life or Health (IDLH), use NIOSH-certified full facepiece pressure demand self-contained breathing apparatus (SCBA) or a full facepiece pressure demand supplied-air respirator (SAR) with escape provisions.

Hand protection:
Chemical resistant protective gloves, Protective glove selection must be based on the user's assessment of the workplace hazards.

Eye protection:
Safety glasses with side-shields. Tightly fitting safety goggles (chemical goggles). Wear face shield if splashing hazard exists.

Body protection:
Body protection must be chosen depending on activity and possible exposure, e.g. head protection, apron, protective boots, chemical-protection suit.

General safety and hygiene measures:
Wear long sleeved work shirt and long work pants in addition to other stated personal protective equipment. Work place should be equipped with a shower and an eye wash. Handle in accordance with good industrial hygiene and safety practice. Personal protective equipment should be decontaminated prior to reuse. Gloves must be inspected regularly and prior to each use. Replace if necessary (e.g. pinhole leaks). Take off immediately all contaminated clothing. Store work clothing separately. Hands and/or face should be washed before breaks and at the end of the shift. No eating, drinking, smoking or tobacco use at the place of work. Keep away from food, drink and animal feeding stuffs.

9. Physical and Chemical Properties

Form:	liquid
Odour:	odourless
Odour threshold:	not applicable, odour not perceivable
Colour:	transparent light yellow
pH value:	approx. 6 - 8 (25 °C)
Freezing point:	approx. 0 °C (1,013.3 hPa) Information applies to the solvent.
Boiling point:	approx. 100 °C (1,013.3 hPa) Information applies to the solvent.

Flash point:	> 100 °C The product has not been tested. The statement has been derived from the properties of the individual components.
Flammability:	not applicable
Lower explosion limit:	As a result of our experience with this product and our knowledge of its composition we do not expect any hazard as long as the product is used appropriately and in accordance with the intended use.
Upper explosion limit:	As a result of our experience with this product and our knowledge of its composition we do not expect any hazard as long as the product is used appropriately and in accordance with the intended use.
Autoignition:	Based on the water content the product does not ignite.
Vapour pressure:	approx. 23.3 hPa (20 °C) Information applies to the solvent.
Density:	approx. 1.10 g/cm3 (20 °C)
Relative density:	1.10 (20 °C)
Vapour density:	not applicable
Partitioning coefficient n-octanol/water (log Pow):	not applicable
Thermal decomposition:	carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released.
Viscosity, dynamic:	163.2 mPa.s (20 °C)
Solubility in water:	miscible
Molar mass:	320.4 g/mol
Evaporation rate:	not applicable
Other Information:	If necessary, information on other physical and chemical parameters is indicated in this section.

10. Stability and Reactivity

Reactivity
No hazardous reactions if stored and handled as prescribed/indicated.

Corrosion to metals:
Corrosive effect on: mild steel brass

Oxidizing properties:
Not an oxidizer.

Chemical stability
The product is stable if stored and handled as prescribed/indicated.

Possibility of hazardous reactions

The product is chemically stable.

Conditions to avoid
Avoid all sources of ignition: heat, sparks, open flame. Avoid prolonged storage. Avoid electro-static discharge. Avoid contamination. Avoid prolonged exposure to extreme heat. Avoid extreme temperatures.

Incompatible materials
oxidizing agents, reducing agents

Hazardous decomposition products

Decomposition products:
No hazardous decomposition products if stored and handled as prescribed/indicated., Prolonged thermal loading can result in products of degradation being given off.

Thermal decomposition:
Possible thermal decomposition products:
carbon monoxide, carbon dioxide, nitrogen oxide, nitrogen dioxide, Hydrocarbons
Stable at ambient temperature. If product is heated above decomposition temperature toxic vapours may be released.

11. Toxicological information

Primary routes of exposure

Routes of entry for solids and liquids are ingestion and inhalation, but may include eye or skin contact. Routes of entry for gases include inhalation and eye contact. Skin contact may be a route of entry for liquefied gases.

Acute Toxicity/Effects

Acute toxicity
Assessment of acute toxicity: Slightly toxic after single ingestion. Relatively nontoxic after short-term skin contact. Relatively nontoxic after short-term inhalation.

Oral
Type of value: LD50
Species: rat
Value: > 2,000 mg/kg (OECD Guideline 423)
No mortality was observed.

Inhalation
Type of value: LC50
Species: rat
Value: > 5.5 mg/l
Exposure time: 4 h
The product has not been tested. The statement has been derived from substances/products of a similar structure or composition.

Dermal
Type of value: LD50
Species: rabbit
Value: > 5,000 mg/kg (OECD Guideline 402)
No mortality was observed.

Assessment other acute effects

Assessment of STOT single:
The available information is not sufficient for evaluation.

The product has not been tested. The statement has been derived from the properties of the individual components.

Irritation / corrosion
Assessment of irritating effects: May cause slight but temporary irritation to the eyes. May cause slight irritation to the skin.

Skin
Species: rabbit
Result: non-irritant
Method: Primary skin irritation test

Eye
Species: rabbit
Result: non-irritant

Sensitization
Assessment of sensitization: Caused skin sensitization in animal studies.

Skin sensitization test
Species: guinea pig
Result: Caused skin sensitization in animal studies.

Chronic Toxicity/Effects

Genetic toxicity
Assessment of mutagenicity: The product has not been tested. The statement has been derived from the properties of the individual components. Mutagenicity tests revealed no genotoxic potential.

Carcinogenicity
Assessment of carcinogenicity: The product has not been tested. The statement has been derived from the properties of the individual components. The results of various animal studies gave no indication of a carcinogenic effect.

Reproductive toxicity
Assessment of reproduction toxicity: The product has not been tested. The statement has been derived from the properties of the individual components. The results of animal studies gave no indication of a fertility impairing effect.

Teratogenicity
Assessment of teratogenicity: The product has not been tested. The statement has been derived from the properties of the individual components. Animal studies gave no indication of a developmental toxic effect at doses that were not toxic to the parental animals.

Symptoms of Exposure

The most important known symptoms and effects are described in the labelling (see section 2) and/or in section 11., Further important symptoms and effects are so far not known.

Medical conditions aggravated by overexposure
Individuals with pre-existing diseases of the respiratory system, skin or eyes may have increased susceptibility to excessive exposures.

12. Ecological Information

Toxicity

Aquatic toxicity
Assessment of aquatic toxicity:
There is a high probability that the product is not acutely harmful to fish. There is a high probability that the product is not acutely harmful to aquatic invertebrates. Acutely harmful for aquatic plants.

There is a high probability that the product is not acutely harmful to aquatic organisms.

Toxicity to fish
LC50 (96 h) > 120 mg/l, Cyprinus carpio

Aquatic invertebrates
EC50 (48 h) > 100 mg/l, Daphnia magna

Aquatic plants
EC50 (72 h) > 98.0 mg/l, Pseudokirchneriella subcapitata

No observed effect concentration (72 h) 25.8 mg/l, Pseudokirchneriella subcapitata

Assessment of terrestrial toxicity
With high probability not acutely harmful to terrestrial organisms.

Other terrestrial non-mammals

Information on: imazapyr
LC50, Anas platyrhynchos
With high probability not acutely harmful to terrestrial organisms.
LD50 > 100 ug/bee, Apis mellifera
With high probability not acutely harmful to terrestrial organisms.

Mobility in soil

Assessment transport between environmental compartments
The product has not been tested. The statement has been derived from the properties of the individual components.

Information on: Imazapyr

The substance will not evaporate into the atmosphere from the water surface.
Following exposure to soil, the product trickles away and can - dependant on degradation - be transported to deeper soil areas with larger water loads.

Additional information

Other ecotoxicological advice:
The ecological data given are those of the active ingredient. Do not release untreated into natural waters.

13. Disposal considerations

Waste disposal of substance:
Pesticide wastes are regulated. Improper disposal of excess pesticide, spray mix or rinsate is a violation of federal law. If pesticide wastes cannot be disposed of according to label instructions, contact the State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container disposal:
Rinse thoroughly at least three times (triple rinse) in accordance with EPA recommendations. Consult state or local disposal authorities for approved alternative procedures such as container recycling. Recommend crushing, puncturing or other means to prevent unauthorized use of used containers.

RCRA:
This product is not regulated by RCRA.

14. Transport Information

Land transport
USDOT

Not classified as a dangerous good under transport regulations

Sea transport
IMDG

Not classified as a dangerous good under transport regulations

Air transport
IATA/ICAO

Not classified as a dangerous good under transport regulations

15. Regulatory Information

Federal Regulations

Registration status:

Crop Protection	TSCA, US	released / exempt
Chemical	TSCA, US	blocked / not listed

EPCRA 311/312 (Hazard categories): Not hazardous;

CA Prop. 65:
Risk assessment indicates No Significant Risk Levels for Carcinogens and No Maximum Allowable Dose Levels for Chemicals Causing Reproductive Toxicity are expected when using this product as labeled for agricultural or residential use.

NFPA Hazard codes:
Health : 2 Fire: 1 Reactivity: 0 Special:

Labeling requirements under FIFRA

This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label.

CAUTION:
May cause moderate but temporary irritation to the eyes.
Prolonged or repeated skin contact may cause sensitization or allergic reactions.
HARMFUL IF SWALLOWED.
KEEP OUT OF REACH OF CHILDREN.
KEEP OUT OF REACH OF DOMESTIC ANIMALS.
Avoid contact with the skin, eyes and clothing.
Avoid inhalation of mists/vapours.

16. Other Information

SDS Prepared by:
BASF NA Product Regulations
SDS Prepared on: 2016/06/16

We support worldwide Responsible Care® initiatives. We value the health and safety of our employees, customers, suppliers and neighbors, and the protection of the environment. Our commitment to Responsible Care is integral to conducting our business and operating our facilities in a safe and environmentally responsible fashion, supporting our customers and suppliers in ensuring the safe and environmentally sound handling of our products, and minimizing the impact of our operations on society and the environment during production, storage, transport, use and disposal of our products.

IMPORTANT: WHILE THE DESCRIPTIONS, DESIGNS, DATA AND INFORMATION CONTAINED HEREIN ARE PRESENTED IN GOOD FAITH AND BELIEVED TO BE ACCURATE , IT IS PROVIDED FOR YOUR GUIDANCE ONLY. BECAUSE MANY FACTORS MAY AFFECT PROCESSING OR APPLICATION/USE, WE RECOMMEND THAT YOU MAKE TESTS TO DETERMINE THE SUITABILITY OF A PRODUCT FOR YOUR PARTICULAR PURPOSE PRIOR TO USE. NO WARRANTIES OF ANY KIND, EITHER EXPRESSED OR IMPLIED, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, ARE MADE REGARDING PRODUCTS DESCRIBED OR DESIGNS, DATA OR INFORMATION SET FORTH, OR THAT THE PRODUCTS, DESIGNS, DATA OR INFORMATION MAY BE USED WITHOUT INFRINGING THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS. IN NO CASE SHALL THE DESCRIPTIONS, INFORMATION, DATA OR DESIGNS PROVIDED BE CONSIDERED A PART OF OUR TERMS AND CONDITIONS OF SALE. FURTHER, YOU EXPRESSLY UNDERSTAND AND AGREE THAT THE DESCRIPTIONS, DESIGNS, DATA, AND INFORMATION FURNISHED BY OUR COMPANY HEREUNDER ARE GIVEN GRATIS AND WE ASSUME NO OBLIGATION OR LIABILITY FOR THE DESCRIPTION, DESIGNS, DATA AND INFORMATION GIVEN OR RESULTS OBTAINED, ALL SUCH BEING GIVEN AND ACCEPTED AT YOUR RISK.
END OF DATA SHEET

GROUP 2 HERBICIDE

Nufarm

Polaris®

Herbicide

For control of undesirable vegetation growing within certain aquatic sites, forestry sites, pasture/rangeland, nonagricultural lands, establishment and maintenance of wildlife openings, release of unimproved Bermudagrass and Bahiagrass, bareground weed control, for use under certain paved areas, industrial noncropland areas including railroad, utility, pipeline and highway rights-of-way, utility plant sites, petroleum tank farms, pumping installations, fence rows, storage areas, non-irrigation ditchbanks including grazed or hayed areas within these sites, roads and transmission lines.

ACTIVE INGREDIENT:

Isopropylamine salt of Imazapyr: (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid)* 27.7%

OTHER INGREDIENTS: 72.3%

TOTAL: 100.0%

* Equivalent to 22.62% 2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid or 2 pounds acid per gallon.

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

In the State of New York, Aquatic Uses are Not Allowed.

KEEP OUT OF REACH OF CHILDREN

CAUTION / PRECAUCIÓN

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 NEXT PAGE BOOKLET FOR ADDITIONAL FIRST AID AND PRECAUTIONARY STATEMENTS

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

EPA Reg. No. 228-534

Manufactured for
Nufarm Americas Inc.
11901 S. Austin Avenue
Alsip, IL 60803

Nufarm
Grow a better tomorrow

1 91662 01337 5

Net Contents

2.5 Gal.

(9.46 L)

Nonrefillable Container

14785000

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION / PRECAUCIÓN

No human or domestic animal hazard statements are required. Follow the instructions for Personal Protective Equipment and User Safety Recommendations.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material

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. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. DO NOT reuse them.

Engineering Controls

Pilots must use an enclosed cockpit that meet the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d) (6)].

USER SAFETY RECOMMENDATIONS

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. If pesticide gets on skin, wash immediately with soap and water.
- 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.

PHYSICAL AND CHEMICAL HAZARDS

Spray solutions of this product should be mixed, stored and applied only in stainless steel, fiberglass, plastic and plastic-lined steel containers.

DO NOT mix, store or apply this product or spray solutions of this product in unlined steel (except stainless steel) containers or spray tanks.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to plants. Drift and run off may be hazardous to plants in water adjacent to treated areas. DO NOT apply directly to water except as specified on the label. Treatment of aquatic weeds may result in oxygen depletion or loss due to decomposition of dead plants. DO NOT treat more than one half the surface area of the water in a single operation and wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outward in bands to allow aquatic organisms to move into untreated areas. DO NOT contaminate water when disposing of equipment washwater or rinsate. This pesticide is toxic to vascular plants and must be used strictly in accordance with the drift precautions of the label.

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.

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 48 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
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material
- Protective eyewear

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 (WPS) 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.

DO NOT enter or allow others to enter treated areas until sprays have dried.

PRODUCT INFORMATION

This product is an aqueous solution to be mixed with water and a surfactant and applied as a spray solution to control undesirable vegetation growing within certain aquatic sites, forestry sites, pasture/rangeland, and nonagricultural lands. Aquatic sites consist of standing and flowing water, estuarine/marine, wetland, and riparian areas. Nonagricultural lands include private, public and military land as follows: uncultivated nonagricultural areas (including airports, highway, railroad and utility rights of way and sewage disposal areas), uncultivated agricultural areas – noncrop producing (including farmyards, fuel storage areas, fence rows, nonirrigation ditch banks and barrier strips), industrial sites – outdoor (including lumber yards, pipeline and tank farms) and natural areas (including wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads, and trails). This product may also be used for the release of unimproved Bermudagrass and Bahiagrass, for bareground weed control, and for use under certain paved surfaces.

Herbicidal Activity: This product will control most annual and perennial grasses and broadleaf weeds in addition to many brush and vine species with some residual control of undesirable species that germinate above the waterline. This product is readily absorbed through emergent leaves and stems and is translocated rapidly throughout the plant, with accumulation in the meristematic regions. For maximum activity, weeds should be growing robustly at the time of application, and the spray solution should include a surfactant (see **ADJUVANTS** section for specific use directions). Treated plants stop growing soon after spray application. Chlorosis appears first in the newest leaves, and necrosis spreads from this point. In perennials, the herbicide is translocated into, and kills, underground or submerged storage organs, which prevents regrowth. Chlorosis and tissue necrosis may not be apparent in some plant species until two or more weeks after application. Complete kill of plants may not occur for several weeks. Applications of this product are rainfast one hour after treatment.

RESTRICTIONS and LIMITATIONS

DO NOT use on food or feed crops.
DO NOT apply this product to water within 0.5 miles upstream of an active potable water intake in flowing water (i.e. river, stream, etc.) or within 0.5 miles of an active potable water intake in a standing body of water, such as a lake, pond or reservoir.
DO NOT apply to water used for irrigation except as described in USE PRECAUTIONS AND RESTRICTIONS section of this label.
Keep from contact with fertilizers, insecticides, fungicides and seeds.
DO NOT drain or flush equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the treated soil may be washed or moved into contact with their roots.
DO NOT use on lawns, walks, driveways, tennis courts or similar areas.
DO NOT side trim desirable vegetation with this product unless severe injury and plant death can be tolerated. Prevent drift of spray to desirable plants.
Clean application equipment after using this product by thoroughly flushing with water.

Nonagricultural Lands and Forestry Sites

- DO NOT apply more than 1.5 pounds acid equivalent Imazapyr (equivalent to 6 pints) per acre per year.

Pasture/Rangeland Sites

- DO NOT apply more than 0.75 pound acid equivalent Imazapyr (equivalent to 3 pints) per acre per year.
- DO NOT treat more than 1 /10 of the available area to be grazed or cut for hay.
- For spot treatment only.

Aquatic Sites

- DO NOT apply more than 1.5 pounds acid equivalent Imazapyr (equivalent to 6 pints) per acre per year.
- **No Application to Aquatic Sites in New York State.**

Aerial application - Aerial application to aquatic sites is restricted to helicopter only.

Irrigation water - Application to water used for irrigation that results in residues greater than 1.0 part per billion (ppb) MUST NOT be used for irrigation purposes for 120 days after application or until residue levels of this product are determined by laboratory analysis or other appropriate means of analysis to be 1.0 ppb or less. When applications are made within 500 feet of an active irrigation intake, DO NOT irrigate for at least 24 hours following application to allow for dissipation.

Quiescent or Slow-moving Waters - In lakes and reservoirs, DO NOT apply this product within 1 mile of an active irrigation water intake during the irrigation season. Applications less than 1 mile from an active irrigation water intake may be made during the off-season, provided that the irrigation intake will remain inactive for a minimum of 120 days after application or until residue levels of this product are determined by laboratory analysis or other appropriate means of analysis to be 1.0 ppb or less.

Restrictions for potable water intakes - DO NOT apply this product directly to water within 0.5 miles upstream of an active potable water intake in flowing water (i.e. river, stream, etc.) or within 0.5 miles of an active potable water intake in a standing body of water such as a lake, pond or reservoir. To make aquatic applications around and within 0.5 miles of active potable water intakes, the water intake must be turned off during application and for a minimum of 48 hours after the application. These aquatic applications may be made only in the cases where there are alternative water sources or holding ponds that would permit the turning off of an active potable water intake for a minimum period of 48 hours after the applications.
NOTE: Existing potable water intakes that are no longer in use, such as those replaced by connections to wells or a municipal water system, are not considered to be active potable water intakes. This restriction does not apply to intermittent, inadvertent overspray of water in terrestrial use sites.

Permitting - Consult local state fish and game agency and water control authorities before applying this product to public water. Permits may be required to treat such water.

Public waters - Application of this product to water can only be made by federal or state agencies, such as Water Management District personnel, municipal officials, and the U.S. Army Corps of Engineers, or those applicators who are licensed or certified as aquatic pest control applicators and are authorized by the state or local government. Treatment to other than non-native invasive species is limited to only those plants that have been determined to be a nuisance by a federal or state government entity.

Private waters - Applications may be made to private waters that are still, such as ponds, lakes and drainage ditches where there is minimal or no outflow to public waters.

Recreational use of water in treatment area - There are no restrictions on the use of water in the treatment area for recreational purposes, including swimming and fishing.

Livestock use of water in/from treatment area - There are no restrictions on livestock consumption of water from the treatment area.

Precautions for Avoiding Injury to Nontarget Plants

Untreated desirable plants can be affected by root uptake of this product from treated soil. Injury or loss of desirable plants may result if this product is applied on or near desirable plants, on areas where their roots extend, or in locations where the treated soil may be washed or moved into contact with their roots. When making applications along shorelines where desirable plants may be present, caution should be exercised to avoid spray contact with their foliage or spray application to the soil in which they are rooted. Shoreline plants that have roots that extend into the water in an area where this product has been applied generally will not be adversely affected by uptake of the herbicide from the water.

If treated vegetation is to be removed from the application site, DO NOT use the vegetative matter as mulch or compost on or around desirable species.

MANAGING OFF-TARGET MOVEMENT

Aerial Application

- Applicators are required to use coarse or coarser droplet size (ASABE S572) or if specifically using a spinning atomizer, nozzle applicators are required to use a volume mean diameter (VMD) of 385 microns or greater for release heights below 10 feet. Applicators are required to use a very coarse or coarser droplet size or if specifically using a spinning atomizer nozzle, applicators are required to use a VMD of 475 microns or greater for relase heights above 10 feet. Applicators must consider the effects of nozzle orientation and flight speed when determining droplet size.
- Applicators are required to use upwind swath displacement.
- The boom length must not exceed 60% of the wingspan or 90% of the rotor blade diameter to reduce spray drift.
- Applications with wind speeds less than 3 mph and with wind speeds greater than 10 mph are prohibited. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.
- Applications into temperature inversions are prohibited.

Ground Boom Application

- Applicators are required to use a nozzle height below 4 feet above the plant canopy or the ground and coarse or Coarser droplet size (ASABE S572) or, if specifically using a spinning atomizer nozzle, applicators are required to use a volume mean diameter (VMD) of 385 microns or greater.
- Applications with wind speeds greater than 10 mph are prohibited.
- Applications into temperature inversions are prohibited.

WIND EROSION

Avoid treating powdery dry or light sandy soils when conditions are favorable for wind erosion. Under these conditions, the soil surface should first be settled by rainfall or irrigation.

ADJUVANTS

Post-emergence applications of this product require the addition of a spray adjuvant for optimum herbicide performance. Only spray adjuvants that are approved or appropriate for aquatic use can be utilized. The addition of a Chemical Producers and Distributors Associations (CPDA) certified adjuvant can increase control. A CPDA certified drift control agent may also be used.

Nonionic Surfactants: Use a nonionic surfactant at the rate 0.25% v/v or higher (see manufacturer's label) of the spray solution (0.25% v/v is equivalent to 1 quart in 100 gallons). For best results, select a nonionic surfactant with a HLB (hydrophilic to lipophilic balance) ratio between 12 and 17 with at least 70% surfactant in the formulated product. Alcohols, fatty acids, oils, ethylene glycol or diethylene glycol should not be considered as surfactants to meet the above requirements.

Methylated Seed Oils or Vegetable Oil Concentrates: Instead of a surfactant, a methylated seed oil or vegetable-based seed oil concentrate may be used at the rate of 1.5 to 2 pints per acre. When using spray volumes greater than 30 gallons per acre, methylated seed oil or vegetable based seed oil concentrates should be mixed at a rate of 1 % of the total spray volume, or alternatively use a nonionic surfactant as described above. Research indicates that these oils may aid in product deposition and uptake by plants under moisture or temperature stress.

Silicone Based Surfactants: See manufacturer's label for specific rate recommendations. Silicone-based surfactants may reduce the surface tension of the spray droplet, allowing greater spreading on the leaf surface as compared to conventional nonionic surfactants. However, some silicone-based surfactants may dry too quickly, limiting herbicide uptake.

Invert emulsions: This product can be applied as an invert emulsion. The spray solution results in an invert (water-in-oil) spray emulsion designed to minimize spray drift and spray run-off, resulting in more herbicide on the target foliage. The spray emulsion may be formed in a single tank (batch mixing) or injected (in-line mixing). Consult the invert chemical label for proper mixing directions. Do not apply more than 3 pints of this product per acre in an invert emulsion.

Fertilizer/Surfactant Blends: Nitrogen based liquid fertilizers such as 28%N, 32%N, 10-34-0 or ammonium sulfate, may be added at the rate of 2 to 3 pints per acre in combination with the recommended rate of nonionic surfactant, methylated seed oil or vegetable/seed oil concentrate. The use of fertilizers in a tank mix without a nonionic surfactant, methylated seed oil or vegetable/seed oil concentrate is not recommended.

Other: An antifoaming agent, spray pattern indicator or drift reducing agent may be applied at the product labeled rate if necessary or desired.

TANK MIXES

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product label involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

APPLICATION METHODS

This product may be selectively applied by using low volume directed application techniques or may be broadcast applied using ground equipment, watercraft, or aircraft. Aerial applications to aquatic sites must be made by helicopter. In addition, this product may also be applied using cut stump, cut stem, and frill or girdle treatment techniques within nonagricultural lands, pasture/rangeland and aquatic sites. See AERIAL APPLICATION and GROUND APPLICATION sections for additional details.

COMPATIBILITY

Before full-scale mixing of this product with other pesticides, emulsifiers, fertilizers, surfactants or oils, determine the compatibility of the proposed mixture. Use proportionate quantities of each ingredient and mix in a small container. Always mix one product thoroughly with the diluent before adding another product. If no incompatibility is evident after 30 minutes, the mixture is generally compatible for spraying. To evaluate potential short term effects of applying the mixture, test the tank mix combination on a few plants or a small area before larger-scale treatments. Wait at least 2 to 3 days for problems to become apparent.

IMPORTANT: MIXING WITH OTHER SUBSTANCES MAY INCREASE THE RISK OF MIXING INCOMPATIBILITIES, REDUCED EFFECTIVENESS AND/OR CAUSE CROP INJURY OR LOSS. ANY LIABILITY FOR LOSS, INJURY OR DAMAGE RESULTING FROM A MIXTURE NOT SPECIFIED ON THIS LABEL OR IN MANUFACTURER'S SUPPLEMENTAL LABELING DISTRIBUTED FOR THIS PRODUCT IS SPECIFICALLY DISCLAIMED BY MANUFACTURER.

AERIAL APPLICATION

All precautions must be taken to minimize or eliminate spray drift. Both helicopter and fixed wing aircraft can be used to apply this product, but applications to aquatic sites are restricted to helicopter only. DO NOT make applications by helicopter or fixed wing aircraft unless appropriate buffer zones can be maintained to prevent spray drift out of the target area, or when spray drift as a result of helicopter application can be tolerated. Aerial equipment designed to minimize spray drift such as a helicopter equipped with a Microfoil™ boom Thru-Valve™ boom or raindrop nozzles must be used and calibrated. Except when applying with a Microfoil boom, a drift control agent may be added at the specified label rate. DO NOT side trim with this product unless death of treated tree can be tolerated.

Uniformly apply the specified amount of this product in 2 to 30 gallons of water per acre. A foam reducing agent may be added at the specified label rate.

Immediately after each use of this product thoroughly clean application equipment, including landing gear. Uncoated steel surfaces (except stainless steel surfaces) may result in corrosion and failure after prolonged exposure to the product. The maintenance of an paint (organic coating) may prevent corrosion.

GROUND APPLICATION

Low Volume Foliar:

Use equipment calibrated to deliver 5 to 20 gallons of spray solution per acre. To prepare the spray solution, thoroughly mix in water 0.5 to 5% of this product plus surfactant (see the ADJUVANTS section of this label for specific recommendations). A foam reducing agent may be applied at the label rate, if needed. For control of difficult species (see AQUATIC WEEDS CONTROLLED section and the TERRESTRIAL WEEDS CONTROLLED section for relative susceptibility of weed species), use the higher concentrations of herbicide and/or spray volumes but DO NOT apply more than 3 quarts of this product per acre in aquatic sites and nonagricultural lands and 1-5 quarts per acre in pasture/rangeland. Excessive wetting of foliage is not necessary.

For low volume foliar application, select proper nozzles to avoid over-application. Proper application is critical to ensure desirable results. Best results are achieved when the spray covers the crown and approximately 70% of the plant. The use of an even flat fan tip with a spray angle of 40 degrees or less will aid in proper deposition.

Appropriate tip sizes include 4004E, or 1504E. For a straight stream and cone pattern, adjustable cone nozzles such as 5500 X3 or 5500 X4 may be used. Attaching a rollover valve onto a Spraying Systems Model 30 gunjet or other similar spray guns allows for the use of both a flat fan and cone tips on the same gun.

Moisten, but DO NOT drench target vegetation causing spray solution to run off.

Low Volume Foliar with Backpacks:

For low-growing species, spray down on the crown, covering crown and penetrating approximately 70% of the plant.

For target species 4 to 8 feet tall, swipe the sides of target vegetation by directing spray to at least two sides of the plant in smooth vertical motions from the crown to the bottom. Make sure to cover the crown whenever possible.

For target species over 8 feet tall, lace sides of the target vegetation by directing spray to at least two sides of the target in smooth zigzag motions from crown to bottom.

Low Volume Foliar with Hydraulic Handgun Application Equipment:

Use same technique as described above for Low Volume Foliar with Backpacks.

For broadcast applications, simulate a gentle rain near the top of target vegetation, allowing spray to contact the crown and penetrate the target foliage without falling to the understory. Herbicide spray solution which contacts the understory may result in severe injury or death of plants in the understory.

High Volume Foliar:

For optimum performance when spraying medium to high-density vegetation, use equipment calibrated to deliver up to 100 gallons of spray solution per acre (GPA). Spray solutions exceeding 100 GPA may result in excessive spray run-off, causing increased ground cover injury, and injury to desirable species.

To prepare the spray solution, thoroughly mix this product in water and add a surfactant (see ADJUVANT section for specific recommendations and rates of surfactants). A foam-reducing agent may be added at the label rate, if needed. For control of difficult species (see AQUATIC WEEDS CONTROLLED section and the ADDITIONAL WEEDS CONTROLLED section for relative susceptibility of weed species), use the higher concentrations of herbicide and/or spray volumes, but DO NOT apply more than 3 quarts of this product per acre in aquatic sites and nonagricultural lands, and 1-5 quarts per acre in pasture/rangeland. Uniformly cover the foliage of the vegetation to be controlled but DO NOT apply to run-off. Excessive wetting of foliage is not necessary.

SIDE TRIMMING

DO NOT side trim with this product unless severe injury or death of the treated tree can be tolerated. This product is readily translocated and can result in death of the entire tree.

CUT SURFACE TREATMENTS

This product may be used to control undesirable woody vegetation by applying the product solution to the cambium area of freshly cut stump surfaces or to fresh cuts on the stem of the target woody vegetation. Applications can be made at any time of the year except during periods of heavy sap flow in the spring. DO NOT over apply solution causing run-off from the cut surface.

Injury may occur to desirable woody plants if the shoots extend from the same root system or their root systems are grafted to those of the treated tree.

This product may be mixed as either a concentrate or dilute solution. The dilute solution may be used for application to the cut surface of the stump or to cuts on the stem of target woody vegetation. Concentrated solutions may be used for applications to cuts on the stem. Use of the concentrated solution permits application to fewer cuts on the stem, especially for large diameter trees. Follow the application instructions to determine proper application techniques for each type of solution.

- To prepare a dilute solution, mix 8 to 12 fluid ounces of this product with one gallon of water. If temperatures are such that freezing of the spray mixture may occur, antifreeze (ethylene glycol) may be used according to manufacturer's label to prevent freezing. The use of a surfactant or penetrating agent may improve uptake through partially callused cambiums.
- To prepare a concentrated solution, mix 2 quarts of this product with no more than 1 quart of water.

CUT STUMP TREATMENT

Dilute Solution - Spray or brush the solution onto the cambium area of the freshly cut stump surface. Ensure that the solution thoroughly wets the entire cambium area (the wood next to the bark of the stump).

CUT STEM TREATMENT

(injection, hack-and-squirt)

Dilute Solution - Using standard injection equipment, apply 1 milliliter of solution at each injection site around the tree with no more than one-inch intervals between cut edges. Ensure that the injector completely penetrates the bark at each injection site.

Concentrate Solution - Using standard injection equipment, apply 1 milliliter of solution at each injection site. Make at least one injection cut for every 3 inches of Diameter at Breast Height (DBH) on the target tree. For example, a 3-inch DBH tree will receive 1 injection cut and a 6-inch DBH tree will receive 2 injection cuts. On trees requiring more than one injection site place the injection cuts at approximately equal intervals around the tree.

CUT STUBBLE

This product can be applied within 2 weeks after mechanical mowing or cutting of brush. To suppress or control resprouting, uniformly apply a spray solution of this product at the rate of 1.0 to 2.0 pints per acre to the cut area. This product may be tank-mixed with picloram (such as Trooper 22K), or equivalent labeled product for this use, to aid in control or suppression of brush. The addition of 5% (v/v) or more of a penetrating agent can aid in uptake through the bark or exposed roots.

Cut stubble applications are made to the soil and cut brush stumps. This type of application may increase ground cover injury. However, vegetation will recover. Making applications of this product directly to the soil can increase potential root uptake causing injury or death of desirable trees.

Efficacy can be increased and root uptake by desirable vegetation can be decreased if the brush is allowed to regrow and the foliage is treated. See the Brush Control section of this label.

FRILL OR GIRDLE TREATMENT

Using a hatchet, machete, or chain saw, make cuts through the bark and completely around the tree to expose the cambium. The cut should angle downward extending into the cambium enough to expose at least two growth rings. Using a spray applicator or brush, apply a 25% to 100% solution of this product into each cut until thoroughly wet. Avoid applying so much herbicide that runoff to the ground or water occurs.

BASAL APPLICATION

This product is an aqueous formulation that requires mixing with **basal oil containing at least 15% emulsifier or will require the addition of an emulsifier, for application to the basal area** of brush and trees to control undesirable vegetation in the following noncropland areas: access roads, airfields, airports, along forest roads, around commercial or industrial structures or outbuildings, around farm and ranch structures and outbuildings, bare ground, construction sites, ditch banks, dry ditches & canals, fences & fencerows, firebreaks, gravel yards, habitat restoration & management areas, highways & roadsides (including aprons, medians, guardrails & right of ways), industrial plant sites, industrial areas, lumber yards, natural areas, paved areas, petroleum & other tank farms, pumping installations, pipeline, power, telephone & utility rights-of-way, power stations, railroad rights-of-way, refineries, resorts, storage areas, substations, uncropped farmstead areas, uncultivated non-agricultural areas, vacant lots, walkways, wastelands & wildlife habitat areas.

Thinline Basal and Stem Application

- This product may be applied as a thinline basal or arcing application to the stems of susceptible species such as big leaf maple (*Acer macrophyllum*), willow (*Salix* spp.) and Eucalyptus (*Eucalyptus* spp.) with a stem ground line diameter of 3 inches or less. Mix 24 to

48 fluid ounces of this product in one gallon of **basal oil containing at least 15% emulsifier**. Maintain uniform mixtures with frequent agitation. Direct a thin line of the spray solution to the stems beginning a few feet from the ground and descending toward the base of the tree making a zig-zag motion. Do not over apply causing puddling.

Low Volume Basal Bark Treatments

- This product, at the rate of 8 to 12 fluid ounces per gallon may be applied for low volume basal bark treatments. This product at 3.0 to 5.0% is recommended to be tank mixed with Relegate™ or Garlon® 4 or other basal products to broaden the spectrum of control. Consult the herbicide labels for rates and susceptible brush species. Mixing with basal requires compatibility tests prior to mixing large quantities. Mixing aids (such as emulsifiers, etc.) and ongoing agitation are required to attain a homogenous tank mix.
- Basal application should be made to the lower 12" to 18" of the target brush and go to the soil. Care should be taken not to puddle or over treat the stem. Basal application is best suited for low density brush sites, where stems do not exceed 700 stems per acre.

For Basal Application – It is advisory to mix only the intended amount of mixture that is to be sprayed that day. Adequate agitation must be maintained with all emulsion mixtures to prevent phase separation. Prior to tank mixing with other products, herbicides and oils, you must determine the compatibility of the proposed mixture. (See **COMPATIBILITY** section).

SPRAY SOLUTION MIXING GUIDE						
			TANK MIXING			
AMOUNT OF SPRAY SOLUTION BEING PREPARED	**NUFARM POLARIS ALONE**		**NUFARM POLARIS WHEN TANK MIXING**		**RELEGATE or GARLON 4**	
	6%	9%	3.0%	5.0%	15%	20%
1 Gallon	8.0 fl. oz.	12.0 fl. oz.	3.8 fl. oz.	6.4 fl. oz.	1.2 pts.	1.6 pts.
3 Gallons	1.5 pts.	2.25 pts.	11.5 fl. oz.	1.2 pts.	1.8 qts.	2.4 qts.
4 Gallons	1.0 qt.	1.5 qts.	15.4 fl. oz.	1.6 pts.	2.4 qts.	3.2 qts.
5 Gallons	1.25 qts.	1.0 qt. + 28.0 fl. oz.	1.2 pts.	1.0 qt.	3.0 qts.	1.0 gal.
50 Gallons	3.0 gals. + 1.0 pt.	4.0 gals. + 2.75 qts.	1.5 gals.	2.5 gals.	7.5 gals.	10.0 gals.
100 Gallons	6.0 gals. + 1.0 qt.	9.0 gals. + 1.5 qts.	3.0 gals.	5.0 gals.	15.0 gals.	20.0 gals.
16 fluid ounces = 1 pint : 2 pints = 1 quart : 4 quarts = 1 gallon						

FORESTRY USE

Site Preparation Treatment

This product may be used to control labeled grasses, broadleaf weeds, vines and brambles, and woody brush and trees on forest sites in advance of regeneration for the following conifer crop species:

Common Name	**Scientific Name**	**Rate** (fl oz/A)
Loblolly pine	*Pinus taeda*	48 to 80
Loblolly X pitch hybrid		
Longleaf pine	*Pinus palustris*	
Shortleaf pine	*Pinus echinata*	
Virginia pine	*Pinus virginiana*	
Slash pine	*Pinus elliottii*	40 to 64
Coastal redwood	*Sequoia sempervirens*	24 to 48
Douglas fir	*Pseudotsuga menziesii*	
Incense cedar	*Libocedrus decurrens*	
Western hemlock	*Tsuga heterophylla*	
California red fir	*Abies magnifica*	24 to 40
California white fir	*Abies concolor*	
Jack pine	*Pinus banksiana*	24 to 32
Lodgepole pine	*Pinus contorta*	
Pitch pine	*Pinus rigida*	
Ponderosa pine	*Pinus ponderosa*	
Sugar pine	*Pinus lambertiana*	
White pine	*Pinus strobes*	
Black spruce	*Picea mariana*	
Red spruce	*Picea rubens*	
White spruce	*Picea glauca*	

Use the specified rate of this product per acre applied as a broadcast foliar spray for long-term control of labeled woody plants and residual control of herbaceous weeds. Within 4 to 6 weeks of treatment, grass and other herbaceous weeds will be controlled and may provide fuel to facilitate a site preparation burn if desired to control conifers or other species tolerant to the herbicide.

Apply the specified rate of this product per acre in 5 to 30 gallons total spray solution for helicopter applications or 5 to 100 gallons total spray solution for mechanical ground spray and backpack applications. Use a minimum of 0.5% by volume nonionic surfactant (NIS). Use the higher label rate of this product and higher spray volumes when controlling particularly dense or multilayered canopies of hardwood stands or difficult to control species.

In certain cases, tank mixes may be necessary for chemical control of conifers and other species tolerant to this product. Observe all precautions and restrictions on the product labels. Always follow the most restrictive label. Combinations with other products labeled for forest site preparation may kill certain plants such as legumes and blackberry which are desirable for wildlife habitat.

Where quick initial brownout (deadening of foliage) is desired for burning, apply a tank mixture of 32 to 64 fl. oz. of this product with 16 to 64 fl. oz. glyphosate or 16 to 48 fl. oz. triclopyr ester per acre. For control of seedling pines, apply 32 to 64 fl. oz. of this product with 3 to 4 quarts glyphosate. For site preparation, rates less than 48 fl. oz, of this product will provide suppression of hard wood brush and trees, some resprouting may occur.

DO NOT plant seedlings of black spruce (*Picea mariana*) or white spruce (*Picea glauca*) on sites broadcast treated with this product or into the treated zone of spot or banded applications for 3 months following application or injury may occur.

HERBACEOUS WEED CONTROL

Use this product for selective weeding in the following conifer crop species:

Common Name	**Scientific Name**	**Rate** (fl oz/A)
Loblolly pine	*Pinus taeda*	12 to 20
Loblolly X pitch hybrid		
Virginia pine	*Pinus virginiana*	
Longleaf pine[1]	*Pinus palustris*	8 to 12
Slash pine[1]	*Pinus elliottii*	
Douglas fir[1]	*Pseudotsuga menziesii*	

[1]Use of surfactant is not recommended

This product may be applied as a broadcast treatment, banded over tree rows, or as a directed spray for release of young conifers from herbaceous weeds. To prevent possibility of conifer injury, DO NOT apply this product when conifers are under stress from drought disease, animal or winter injury, planting shock, or other stresses reducing conifer vigor. Broadcast applications may be made by helicopter, ground, or backpack sprayer. For difficult to control weeds, use the higher labeled rates. Where herbaceous weeds have overtopped conifer seedlings, a nonionic surfactant may be added to improve weed control (except for slash pine, long leaf pine, and Douglas fir) at a rate not to exceed 0.5% of spray solution volume. Some minor conifer growth inhibition may be observed when herbaceous weed control treatments are made during periods of active conifer growth.

This product may also be applied using backpack or handheld sprayers to control herbaceous weeds around individual conifer seedlings. Mix 0.8 to 1.2 fl. oz. of this product + 0.2 oz. nonionic surfactant per gallon of water. Direct the spray to the weeds and minimize the amount applied to conifer foliage for best conifer tolerance. Ensure that maximum labeled rates per acre for previously listed crop species are not exceeded.

This product may be tank mixed with Spyder® and/or Spyder Extra to broaden the spectrum of weeds controlled. For loblolly pine, apply 8 to 12 fl. oz. of this product + 1 to 2 fl. oz. Spyder and/or Spyder Extra per acre. The application of this product plus Spyder and/or Spyder Extra on other conifer species may cause growth suppression.

CONIFER RELEASE TREATMENT

This product may be applied as a broadcast or directed spray application for suppression of labeled brush, tree, and herbaceous weed species. Directed spray applications may be made with low volume applications in conifer stands of all ages by targeting unwanted vegetation and avoiding direct application to the conifer. Ensure that maximum labeled rates per acre listed for the following crop species are not exceeded.

Broadcast Applications for Release of the Following Conifers from Hardwood Competition

Common Name	**Scientific Name**	**Rate** (fl oz/A)
Loblolly pine[3]	*Pinus taeda*	24 to 40
Loblolly X pitch hybrid[3]		
Virginia pine[3]	*Pinus virginiana*	
Longleaf pine	*Pinus palustris*	24 to 32
Pitch pine	*Pinus rigida*	
Shortleaf pine	*Pinus echinata*	
Slash pine	*Pinus elliottii*	
White pine[1]	*Pinus strobes*	16 to 32
California red fir	*Abies magnifica*	16 to 24
California white fir	*Abies concolor*	
Lodgepole pine[2]	*Pinus contorta*	
Douglas fir[2]	*Pseudotsuga menziesii*	
Jack pine[2]	*Pinus banksiana*	12 to 24
Black spruce[2]	*Picea mariana*	
Red spruce[2]	*Picea rubens*	
White spruce[2]	*Picea glauca*	

[1]DO NOT make applications to white pine stands younger than three years old. To minimize potential white pine injury, release treatments should not be made prior to July 15.

[2]Applications should be made after formation of final conifer resting buds in the fall or height growth inhibitor may occur

[3]**Mid rotation release:** For broadcast applications below the pine canopy in established stands of loblolly pine, loblolly X pitch hybrid, and Virginia pine, use 32 to 64 fl. oz. of this product per acre. For mid rotation release of other species, use rates listed in the chart above.

For slash pine and longleaf pine, broadcast release treatments over the top of pines for the purpose of woody plant control must be made after August 15 and only in stands 2 through 5 years old. For applications over the top of slash pine and longleaf pine, DO NOT add surfactant and use lower labeled rates on sandy soils.

FOR THE AERIAL RELEASE TO SLASH PINE (*PINUS ELLIORTII*) STANDS OVER THE AGE OF 5 YEARS

This product may be applied as an aerial application for release of slash pine stands over the age of 5 years. In addition to reading and following all directions in this product, the following precautions and restrictions are required:

- Make applications in the fall after slash pine height growth has stopped and buds have set.
- Do not apply before September 15 even if height growth has stopped and buds have set.
- A maximum of 12 to 14 fl. oz./A of this product may be applied. Use the 12 fl. oz./A rate on sandier sites.

Apply the label rate of this product per acre when making broadcast applications with helicopter or ground spray equipment. Refer to mixing and application instructions for proper spray volumes. A nonionic surfactant may be added at no more than 0.25% by volume.

Use the higher label rates of this product when controlling particularly dense stands or difficult to control species.

Some minor conifer growth inhibition may be observed when release treatments are made during periods of active conifer growth. To minimize potential conifer height growth inhibition, DO NOT make broadcast applications to conifer stands except loblolly pine before the end of the second growing season. To minimize potential confer height growth inhibition, broadcast release treatments may be made late in the growing season. To prevent possibility of conifer injury, DO NOT apply this product when conifers are under stress from drought, disease, animal or winter injury, or other stresses reducing conifer vigor.

This product may be used to release loblolly pine seedlings during the first growing season following planting or for one year old natural loblolly pine regeneration. For one year old loblolly pine release, apply 24 to 40 fl. oz. per acre of this product after July 15. Rates below 32 fl. oz. per acre are intended for hardwood growth suppression expect hardwood resprouting.

SPOT TREATMENT OF UNDESIRABLE HARDWOOD VEGETATION

This product may be used as a directed foliar or cut stem application to control undesirable brush and hardwoods in the management of stands of all ages for the conifer species listed in the broadcast application section above. Refer to the mixing and application instructions in the foliar or cut stem sections for proper use rates, equipment, and application techniques. DO NOT exceed maximum labeled rates per acre listed for crop species. Cut stem applications may be used for spot treatment of undesirable hardwoods in Ponderosa pine stands using 24 fl. oz. or less of this product per acre.

Avoid direct application to desired plant species or injury may occur. Injury may occur to nontarget or desirable hardwoods or conifers if they extend from the same root system or their root systems are grafted to those of the treated tree or their roots extend into the treated zone.

LATE ROTATION VEGETATION CONTROL IN WESTERN CONIFER

In California, the Pacific Northwest, and Inland Northwest, broadcast aerial applications of this product up to 48 fl. oz. per acre are permissible in conifer stands that are targeted for harvesting the year following treatment. Use minimum spray volume of 15 gallons per acre. Significant conifer injury or mortality must be expected. DO NOT use this treatment if conifer injury or mortality cannot be tolerated.

BAG AND SPRAY APPLICATION FOR CONIFER RELEASE

In Douglas fir and Ponderosa pine stands, broadcast applications of this product up to 32 fl. oz. per acre are permissible when the trees are covered by bags prior to the application. The bags must prevent the spray mix from contacting the conifer foliage. On sites with coarse textured soils (e.g., decomposed granite, pumice, sandy or rocky sites) or low levels of soil organic matter (generally 5% or less) significant conifer growth inhibition and mortality is possible. DO NOT use this treatment on these types of sites if conifer growth inhibition and mortality cannot be tolerated.

NONAGRICULTURAL LAND USE

This product may be used for woody and herbaceous weed control in nonagricultural lands including private, public, and military lands. Applications are not applicable to treatment of commercial timber or other plants grown for sale or other commercial use or for commercial seed production or for research purposes.

BRUSH CONTROL

Use the specified rate of this product with the preferred application technique for control of undesirable brush.

Tank Mixes and Application Rates for Low-Volume Foliar Brush Control*

Target Vegetation	Arsenal Rate (% by volume)	Tank Mix
Mixed hardwoods without elm, locust, or pine	1.0 to 1.5	Surfactant
Mixed hardwoods containing elm, locust, and pine	0.5 to 1.0	AquaNeat® at 2% to 3% or Razor® at 2 2/3 to 4% by volume plus surfactant
Mixed hardwoods with locust and pine but no elm		Krenite® at 2% to 5% by volume plus surfactant
Mixed hardwoods with locust and elm but no pine		Patriot® at 2 oz/A or 2-3 grams/gal plus surfactant
*Tank mixes with 2,4-D or products containing 2,4-D could result in reduced product efficacy.		

Backpack and Handheld Spray Mixing Guide

% Solution	Product Per Gallon of Mix (oz)	Product Per 4 Gallon Backpack (oz)
0.25	0.3	1.3
0.5	0.6	2.6
1.0	1.3	5.1
2.0	2.6	10.2
3.0	3.8	15.4
5.0	6.4	25.6

Measuring Chart

128 fluid ounces	=	1 gallon
16 fluid ounces	=	1 pint
8 pints	=	1 gallon
4 quarts	=	1 gallon
2 pints	=	1 quart

FOR SELECTIVE CONTROL OF UNDESIRABLE WEEDS IN UNIMPROVED BERMUDAGRASS AND BAHIAGRASS

This product may be used on unimproved industrial noncropland Bermudagrass and bahiagrass turf, such as roadsides, utility rights-of-way and other nonagricultural lands. The application of this product on established common and coastal Bermudagrass and bahiagrass provides control of labeled broadleaf and grass weeds. Competition from these weeds is eliminated, releasing the Bermudagrass and bahiagrass. Treatment of Bermudagrass with this product results in a compacted growth habit and seedhead inhibition.

Uniformly apply with properly calibrated ground equipment using at least 10 gallons of water per acre. Temporary yellowing of grass may occur when treatment is made after growth begins. DO NOT add surfactant in excess of the specified rate (1 fl. oz. per 25 gallons of spray solution). DO NOT apply to grass during its first growing season. DO NOT apply to grass that is under stress from drought, disease, insects, or other causes.

DOSAGE RATES AND TIMING:

Bermudagrass - Apply this product at 6 to 12 fl. oz. per acre when the Bermudagrass is dormant. Apply this product at 6 to 8 fl. oz. per acre after the bermudagrass has reached full green-up. Applications made during green-up will delay green-up. Include a surfactant in the spray solution.

For additional pre-emergence control of annual grasses and small seeded broadleaf weeds, add Pendulum® Aquacap™ herbicide at the rate of 3.1 to 6.3 pints per acre. Consult the Pendulum® label for weeds controlled and for other use directions and precautions.

For control of Johnsongrass in bermudagrass turf, apply this product at 8 fl. oz. per acre plus Roundup® or Razor® at 12 fl. oz. per acre plus surfactant. For additional control of broadleaves and vines, Tahoe®3A or Garlon®3A may be added to the above mix at the rate of 1-2 pints per acre. Observe all precautions and restrictions on the Tahoe®3A, Garlon®3A and Roundup® labels.

Bahiagrass - Apply this product at 4 to 8 fl. oz. per acre when the bahiagrass is dormant or after the grass has initiated green-up but has not exceeded 25% green-up. Include in the spray solution a surfactant (See Adjuvant section for specific use directions for surfactants).

WEEDS CONTROLLED IN UNIMPROVED BERMUDAGRASS AND BAHIAGRASS

Bedstraw (*Galium* spp.)
Bishopweed (*Ptilimnium capillaceum*)
Buttercup (*Ranunculus parviflorus*)
Carolina geranium (*Geranium carolinianum*)
Fescue (*Festuca* spp.)
Foxtail (*Setaria* spp.)
Little barley (*Hordeum pusillum*)
Seedling Johnsongrass (*Sorghum halepense*)
Wild carrot (*Daucus carota*)
White clover (*Trifolium repens*)
Yellow woodsorrel (*Oxalis stricta*)

GRASS GROWTH AND SEEDHEAD SUPPRESSION

This product may be used to suppress growth and seedhead development of certain turfgrass in unimproved areas. When applied to desirable turf, this product may result in temporary turf damage and/or discoloration. Effects to the desirable turf may vary with environmental conditions. For optimum performance, application should be made prior to culm elongation. Applications may be made before or after mowing. If applied prior to mowing, allow at least three days of active growth before mowing. If following a mowing, allow sufficient time for the grasses to recover before applying this product or injury may be amplified.
DO NOT apply to turf under stress (drought, cold, insect damaged, etc.) or severe injury or death may occur.

Bermudagrass - Apply this product at 6 to 8 fl. oz. per acre from early green-up to prior to seed head initiation. DO NOT add a surfactant for this application.

Cool Season Unimproved Turf - Apply this product at 2 fl. oz. per acre plus 0.25% nonionic surfactant. For increased suppression, this product may be tank-mixed with such products as Campaign® (24 fl. oz. per acre) or Embark® (8 fl. oz. per acre).
Tank-mixes may increase injury to desired turf. Consult each product label for recommended turf species and other use directions and precautions. Tank mixes with 2,4-D or products containing 2,4-D may decrease the effectiveness of this product.

TOTAL VEGETATION CONTROL WHERE BAREGROUND IS DESIRED

This product is an effective herbicide for preemergence or post-emergence control of many annual and perennial broadleaf and grass weeds where bareground is desired. This product is particularly effective on hard-to-control perennial grasses. This product at 1.5 to 6 pints per acre can be used alone or in tank-mix with herbicides approved for use in bare ground. The degree and duration of control are dependent on the rate of this product used, tank-mix partner, the volume of carrier, soil texture, rainfall and other conditions.

Consult manufacturer's labels for specific rates and weeds controlled. Always follow the most restrictive directions for use and precautionary statements of each product when making an application involving tank-mixes.

Applications of this product may be made anytime of the year. Use equipment calibrated to deliver desired gallons per acre spray volume and uniformly distribute the spray pattern over the treated area.

Post-emergence Applications: Always use a spray adjuvant (See Adjuvant section of this label) when making a post-emergence application. For optimum performance on tough to control annual grasses, applications should be made at a total volume of 100 gallons per acre or less. For quicker burndown or brown-out of target weeds, this product may be tank-mixed with products such as Razor®, or Roundup®. Tank mixes with 2,4-D or products containing 2,4-D may reduce the performance of this product. Always follow the most restrictive directions for use and precautionary statements of each product when tank-mixing.

Spot Treatments: This product may be used as a follow-up treatment to control escapes or weed encroachment in a bareground situation. To prepare the spray solution, thoroughly mix in each gallon of water 0.5 to 5% of this product plus an adjuvant. For increased burndown, include Razor®, Roundup®. or similar products. For added residual weed control or to increase the weed spectrum, add ProClipse® herbicide, Vanquish® herbicide, or Diablo® herbicide. Always follow the most restrictive directions for use and precautionary statements of each product when tank-mixing.

FOR CONTROL OF UNDESIRABLE WEEDS UNDER PAVED SURFACES

This product can be used under asphalt, pond liners and other paved areas, ONLY in industrial sites or where the pavement has a suitable barrier along the perimeter that prevents encroachment of roots of desirable plants.

This product should be used only where the area to be treated has been prepared according to good construction practices. If rhizomes, stolons, tubers or other vegetative plant parts are present in the site, they should be removed by scalping with a grader blade to a depth sufficient to insure their complete removal.

Paving should follow applications of this product as soon as possible. DO NOT apply where the product may contact the roots of desirable trees or other plants.

This product is not to be used under pavement on residential properties such as driveways or parking lots or for use in recreational areas such as under bike or jogging paths, golf cart paths, or tennis courts, or where landscape plantings could be anticipated.

Injury or death of desirable plants may result if this product is applied where roots are present or where they may extend into the treated area. Roots of trees and shrubs may extend a considerable distance beyond the branch extremities (drip line).

Applications should be made to the soil surface only when final grade is established. DO NOT move soil following application of this product. Apply this product in sufficient water (at least 100 gal. per acre) to ensure thorough and uniform wetting of the soil surface, including the shoulder areas. Add this product at a rate of 3 quarts per acre (2.2 fl. oz. per 1000 square feet) to clean water in the spray tank during the filling operation. Agitate before spraying.

If the soil is not moist prior to treatment, incorporation of this product is needed for herbicide activation. This product can be incorporated into the soil to a depth of 4 to 6 inches using a rototiller or disc. Rainfall or irrigation of 1 inch will also provide uniform incorporation. DO NOT allow treated soil to wash or move into untreated areas.

SPOT TREATMENTS AND CRACK–AND-CREVICE TREATMENTS

Use this product as an initial or follow up treatment to control weed escapes or weed encroachment in bareground situations, including cracks and crevices in paved surfaces such as parking lots, runways and roadways.

FOR SPOT TREATMENT WEED CONTROL IN GRASS PASTURE AND RANGELAND

For the control of undesirable vegetation in grass pasture and rangeland, this product may be applied as a spot treatment at a rate of 2 to 48 fl. oz. of product per acre using any of the ground application methods as described in this label. Spot applications may not exceed more than one tenth of the area to be grazed or cut for hay in grass pasture and rangeland. See appropriate sections of this label for specific use directions for the application method and vegetation control desired.

DO NOT apply more than 48 fl. oz. per acre per year.

Grazing and Haying Restrictions:
DO NOT cut forage grass for hay for 7 days after application of this product.
There are no grazing restrictions following application of this product.

Rangeland Use Instructions:
This product may be applied to rangeland for the control of undesirable vegetation to achieve one or more of the following vegetation management objectives:

- Control of undesirable (noxious, invasive and non-native) plant species.
- Control of undesirable vegetation for wildlife habitat improvement.
- Control of undesirable vegetation to aid in the establishment of desirable rangeland plant species.
- Release of existing desirable rangeland plant communities from the competitive pressure of undesirable plant species.
- Control of undesirable vegetation to aid in the establishment of desirable vegetation following a fire.
- Control of vegetation to reduce wildfire fuel.

To ensure the protection of threatened and endangered plants, when applying this product to rangeland:

- Federal agencies must follow NEPA regulations to ensure protection of threatened and endangered plants.
- Other organizations or individuals must operate under a habitat conservation plan if threatened or endangered plants are known to be present on the land to be treated.
- State agencies must work with the Fish and Wildlife Service or the Service's designated state conservation agency to ensure protection of threatened and endangered plants.

See appropriate sections of this label for specific use directions for the desired rangeland vegetation management control desired.

This product must only be applied to a given rangeland acre as specific weed problems arise. Long-term control of undesirable weeds ultimately depends on the successful use of the land management practices that promote the sustainability and growth of desirable rangeland plant species.

ROTATIONAL CROP GUIDELINE

Rotational crops may be planted 12 months after applying this product at the specified pasture and rangeland rate. Twelve months after an application of this product, and before planting any crop, a successful field bioassay must be completed. The field bioassay consists of a test strip of the intended rotational crop planted in the previously treated area in the grass pasture and rangeland and grown to maturity. The test strip should include low areas and knolls, and include variations in soil type and pH within the treated area. If no crop injury is evident in the test strip, the intended rotational crop may be planted the following year.

Use of this product in accordance with label directions is expected to result in normal growth of rotational crops in most situations; however, various agronomic factors and environmental factors make it impossible to eliminate all risks associated with the use of this product and, therefore, rotational crop injury is always possible.

TERRESTRIAL WEEDS CONTROLLED

In terrestrial sites, this product will provide preemergence or post-emergence control with residual control of the following target vegetation species at the rates listed. Residual control refers to control of newly germinating seedlings in both annuals and perennials. In general, annual weeds may be controlled by preemergence or postemergence applications of this product. For established biennials and perennials postemergence applications of this product are recommended.

The rates shown below pertain to broadcast applications and indicate the relative sensitivity of these weeds. The relative sensitivity should be referenced when preparing low volume spray solutions (see "Low Volume" section of "Ground Applications"); low volume applications may provide control of the target species with less product per acre than is shown for the broadcast treatments. This product must be used only in accordance with the Directions for Use on this label.

The relative sensitivity of the species listed below can also be used to determine the relative risk of causing non-target plant injury if any of the below listed species are considered to be desirable within the area to be treated.

Resistant Biotypes: Naturally occurring biotypes (a plant within a given species that has a slightly different, but distinct genetic makeup from other plants of the same species) of some weeds listed on this label may not be effectively controlled. If naturally occurring resistant biotypes are present in an area, this product should be tank-mixed or applied sequentially with an appropriate registered herbicide having a different mode of action to ensure control.

TERRESTRIAL WEEDS CONTROLLED		
COMMON NAME	**SCIENTIFIC NAME**	**GROWTH HABIT[2]**
GRASS WEEDS		
Apply 2 to 3 pints per acre[1]		
Annual bluegrass	*Poa annua*	A
Broadleaf signalgrass	*Brachiaria platyphylla*	A
Canada bluegrass	*Poa compressa*	P
Downy brome	*Bromus tectorum*	A
Fescue	*Festuca* spp.	A/P
Foxtail	*Setaria* spp.	A
Italian ryegrass	*Lotium multiflorum*	A
Johnsongrass[4]	*Sorghum halepense*	P
Kentucky bluegrass	*Poa pratensis*	P
Napier grass[5]	*Pennisetum purpureum*	P
Orchardgrass	*Dactytis glomerata*	P
Paragrass	*Brachiaria mutica*	P
Quackgrass	*Agropyron repens*	P
Sandbur	*Cenchrus* spp.	A
Smooth brome	*Bromus inermis*	P
Vaseygrass	*Paspalum urvillei*	P
Wild oats	*Avena fatua*	A
Witchgrass	*Panicum capillare*	A

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)		
COMMON NAME	**SCIENTIFIC NAME**	**GROWTH HABIT[2]**
GRASS WEEDS (continued)		
Apply 3 to 4 pints per acre[1]		
Barnyardgrass	*Echinochloa crus-galli*	A
Beardgrass	*Andropogon* spp.	P
Bluegrass, annual	*Poa annua*	A
Bulrush[5]	*Scirpus validus*	P
Cheat	*Bromus secalinus*	A
Cogongrass	*Imperata cylindrica*	P
Crabgrass	*Digitaria* spp.	A
Crowfootgrass	*Dactyloctenium aegyptium*	A
Fall panicum	*Panicum dichotomiflorum*	A
Goosegrass	*Eleusine indica*	A
Itchgrass	*Rottboellia exaltata*	A
Lovegrass[4]	*Eragrostis* spp.	P
Maidencane[5]	*Panicum hemitomon*	A
Panicum, browntop	*Panicum fasciculatum*	A
Panicum, Texas	*Panicum texanum*	A
Prairie threeawn	*Aristida oligantha*	P
Sandbur, field	*Cenchrus incertus*	A
Signalgrass	*Brachiaria platyphylla*	A
Wild barley	*Hordeum* spp.	A
Woolly cupgrass	*Eriochloa villosa*	A

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
GRASS WEEDS (continued)		
Apply 4 to 6 pints per acre[1]		
Bahiagrass	*Paspalum notatum*	P
Bermudagrass[3,4]	*Cynodon dactylon*	P
Big bluestem	*Andropogon gerardii*	P
Dallisgrass	*Paspalum dilatatum*	P
Feathertop	*Pennisetum villosum*	P
Guineagrass	*Panicum maximum*	P
Saltgrass[3]	*Distichlis stricta*	P
Sand dropseed	*Sporobolus cryptandrus*	P
Sprangletop	*Leptochloa* spp.	A
Timothy	*Phleum pratense*	P
Wirestem muhly	*Muhlenbergia frondosa*	P

[1] Use higher rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use a minimum of 75 GPA.
[4] Use higher labeled rates.
[5] Use not permitted in California unless otherwise directed by supplemental labeling.

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
BROADLEAF WEEDS		
Apply 2 to 3 pints per acre[1]		
Burdock	*Arctium* spp.	B
Carolina geranium	*Geranium carolinianum*	A
Carpetweed	*Mollugo verticillata*	A
Clover	*Trifolium* spp.	A/P
Common chickweed	*Stellaria media*	A
Common ragweed	*Ambrosia artemisiifolia*	A
Dandelion	*Taraxacum officinale*	P
Dogfennel	*Eupatorium capillifolium*	A
Filaree	*Erodium* spp.	A
Fleabane	*Erigeron* spp.	A
Hoary vervain	*Verbena stricta*	P
Indian mustard	*Brassica juncea*	A
Kochia	*Kochia scoparia*	A
Lambsquarters	*Chenopodium album*	A
Lespedeza[3]	*Lespedeza* spp.	P
Miners lettuce	*Montia perfoliata*	A

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
BROADLEAF WEEDS (continued)		
Apply 2 to 3 pints per acre[1] (continued)		
Mullein	*Verbascum* spp.	B
Nettleleaf goosefoot	*Chenopodium murale*	A
Oxeye daisy	*Chrysanthemum leucanthemum*	P
Pepperweed	*Lepidium* spp.	A
Pigweed	*Amaranthus* spp.	A
Puncturevine	*Tribulus terrestris*	A
Russian thistle	*Salsola kali*	A
Smartweed	*Polygonum* spp.	A/P
Sorrell	*Rumex* spp.	P
Sunflower	*Helianthus* spp.	A
Sweet clover	*Melilotus* spp.	A/B
Tansymustard	*Descurainia pinnata*	A
Western ragweed	*Ambrosia psilostachya*	P
Wild carrot	*Daucus carota*	B
Wild lettuce	*Lactuca* spp.	A/B
Wild parsnip	*Pastinaca saliva*	B
Wild turnip	*Brassica campestris*	B
Woollyleaf bursage	*Franseria tomentosa*	P
Yellow woodsorrel	*Oxalis stricta*	P
Apply 3 to 4 pints per acre[1]		
Broom snakeweed	*Gutierrezia sarothrae*	P
Bull thistle	*Cirsium vulgare*	B
Burclover	*Medicago* spp.	A
Chickweed mouseear	*Cerastium vulgatum*	A
Clover hop	*Trifolium procumbens*	A
Cocklebur	*Xanthium strumarium*	A
Cudweed	*Gnaphalium* spp.	A
Desert camelthorn	*Alhagi pseudalhagi*	P
Dock	*Rumex* spp.	P
Fiddleneck	*Amsinckia intermedia*	A
Goldenrod	*Solidago* spp.	P
Henbit	*Lamium amplexicaule*	A
Knotweed, prostrate	*Polygonum aviculare*	A/P
Pokeweed	*Phytolacca americana*	P
Purslane	*Portulaca* spp.	A
Pusley, Florida	*Richardia scabra*	A
Rocket London	*Sisymbrium irio*	A

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
BROADLEAF WEEDS (continued)		
Apply 3 to 4 pints per acre[1] (continued)		
Rush skeletonweed[4]	*Chondrilla juncea*	B
Saltbush	*Atriplex* spp.	A
Shepherdspurse	*Capsella bursa-pastoris*	A
Spurge, annual	*Euphorbia* spp.	A
Stinging nettle[4]	*Urtica dioica*	P
Velvetleaf	*Abutilon theophrasti*	A
Yellow starthistle	*Centaurea solstitialis*	A
Apply 4 to 6 pints per acre[1]		
Arrowwood	Pluchea sericea	A
Canada thistle	Cirsium arvense	P
Giant ragweed	Ambrosia trifida	A
Gray rabbitbrush	*Chrysothamnus nauseosus*	P
Little mallow	*Malva parviflora*	B
Milkweed	*Asclepias* spp.	P
Primrose	*Oenothera kunthiana*	P
Silverleaf nightshade	*Solarium elaeagnifolium*	P
Sowthistle	*Sonchus* spp.	A
Texas thistle	*Cirsium* texanum	P

[1] Use higher rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use not permitted in California unless otherwise directed by supplemental labeling.
[4] For best results, early postemergence applications are required.

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
VINES AND BRAMBLES		
Apply 1 pint per acre		
Field bindweed	*Convolvulus arvensis*	P
Hedge bindweed	*Calystegia sepium*	A
Apply 2 to 3 pints per acre[1]		
Wild buckwheat	*Polygonum convolvulus*	P
Apply 3 to 4 pints per acre[1]		
Greenbriar	*Smilax* spp.	P
Honeysuckle[3]	*Lonicera* spp.	P
Morningglory	*Ipomoea* spp.	A/P
Poison ivy	*Rhus radicans*	P
Redvine	*Brunnichia cirrhosa*	P

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
VINES AND BRAMBLES (continued)		
Apply 3 to 4 pints per acre[1] (continued)		
Wild rose[3] Including:	*Rosa* spp.	P
Multiflora rose	*Rosa multiflora*	P
Macartney rose	*Rosa bracteata*	P
Apply 4 to 6 pints per acre[1]		
Trumpetcreeper	*Campsis radicans*	P
Virginia creeper	*Parthenocissus quinquefolia*	P
Wild grape	*Vitis* spp.	P

[1] Use higher labeled rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use higher labeled rate.

TERRESTRIAL WEEDS CONTROLLED (continued)

COMMON NAME	SCIENTIFIC NAME	GROWTH HABIT[2]
BRUSH SPECIES		
Apply 2 to 4 pints per acre[1]		
Brazilian peppertree	*Schinus terebinthifolius*	P
Chinese tallow tree Popcorn tree	*Sapium sebiferum*	P
Russian olive	*Elaeagnus angustifolia*	P
Sumac	*Rhus* spp.	P
Willow	*Salix* spp.	P
Apply 4 to 6 pints per acre[1]		
Alder	*Alnus* spp.	P
American beech	*Fagus grandifolia*	P
Ash[3]	*Fraxinus* spp.	P
Aspen	*Populus* spp.	P
Autumn olive	*Elaeagnus umbellata*	P
Bald cypress	*Taxodium distichum*	P
Bigleaf maple	*Acer macrophyllum*	P
Birch[3]	*Betula* spp.	P
Black gum[4]	*Nyssa sylvatica*	P
Black oak	*Quercus kelloggii*	P
Boxelder	*Acer negundo*	P
Ceanothis	*Ceanothis* spp.	P
Cherry[3, 4]	*Prunus* spp.	P
Chinaberry	*Melia azedarach*	P
Chinquapin	*Castanopsis chrysophylla*	P

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)		
COMMON NAME	**SCIENTIFIC NAME**	**GROWTH HABIT[2]**
BRUSH SPECIES (continued)		
Apply 4 to 6 pints per acre[1]		
Cottonwood	*Populus trichocarpa* *P deltoides*	P
Cypress	*Taxodium* spp.	P
Dogwood[3]	*Cornus* spp.	P
Elm	*Ulmus* spp.	P
Eucalyptus	*Eucalyptus* spp.	P
Hawthorn	*Crataegus* spp.	P
Hickory[3]	*Carya* spp.	P
Huckleberry	*Gaylussacia* spp.	P
Lyonia spp. Including: Fetterbush Staggerbush	 *Lyonia lucida* *Lyonia mariana*	 P P
Madrone	*Arbutus menziesii*	P
Maple	*Acer* spp.	P
Melaleuca	*Melaleuca quinquenervia*	P
Mulberry[3, 6]	*Morus* spp.	P
Oak[7]	*Quercus* spp.	P
Persimmon[4]	*Diospyros virginiana*	P
Poison oak	*Rhus diversiloba*	P
Poplar	*Populus* spp.	P
Privet	*Ligustrum vulgare*	P
Red alder	*Alnus rubra*	P
Red maple	*Acer rubrum*	P

(continued)

TERRESTRIAL WEEDS CONTROLLED (continued)		
COMMON NAME	**SCIENTIFIC NAME**	**GROWTH HABIT[2]**
BRUSH SPECIES (continued)		
Apply 4 to 6 pints per acre[1] (continued)		
Saltcedar	*Tamarix pentandra*	P
Sassafras	*Sassafras albidum*	P
Sourwood[4]	*Oxydendrum arboreum*	P
Sweetgum	*Liquidambar styraciflua*	P
Sycamore	*Platanus occidentals*	P
Tanoak[3]	*Lithocarpus densiflorus*	P
Titi[8]	*Cyrilla racemiflora*	P
Tree of heaven	*Ailanthus altissima*	P
Vaccinium spp. Including: Blueberry Sparkleberry	 *Vaccinium* spp. *Vaccinium arboreum*	 P P
Water willow[9]	*Justicia americana*	P
Yellow poplar[3]	*Liriodendron tulipifera*	P

[1] Use higher labeled rate where heavy or well-established infestations occur.
[2] Growth Habit: A = Annual, B = Biennial, P = Perennial
[3] Use higher labeled rate.
[4] Best control with applications before formation of fall leaf color.
[5] Tank mix with glyphosate.
[6] Degree of control may be species dependent.
[7] For water oak (*Quercus nigia*) laurel oak (*Quercus laurifloria*) willow oak (*Quercus phellos*) and live oak (*Quercus virginiana*) use higher labeled rates.
[8] Suppression only.
[9] Use not permitted in California unless otherwise directed by supplemental labeling.

AQUATIC WEEDS CONTROLLED

This product may be applied for control of floating and emergent weeds (see Aquatic Weeds Controlled and Terrestrial Weeds Controlled) in or near bodies of water that may be nonflowing, flowing, or transient. This product may be applied to aquatic sites that include rivers, lakes, streams, seeps, drainage ditches, ponds, reservoirs, canals, bogs, marshes, swamps, estuaries, bays, brackish water, transitional areas between terrestrial and aquatic sites, riparian sites and seasonal wet areas. See Use Precautions and Restrictions section of this label for instructions, directions, precautions and restrictions on aquatic uses.

Read and observe the following directions if aquatic sites are present in nonagricultural lands and are part of the intended treatment area.

This product must be applied to the emergent foliage of the target vegetation and little to no activity on submerged aquatic weeds. Concentrations of this product, resulting from direct application to water, are not expected to be of sufficient concentration nor duration to control target vegetation. Application should be made in such a way as to maximize spray interception by the target vegetation while minimizing the amount of overspray that enters the water.

This product does not control plants that have a majority of their foliage underwater or plants that are completely submerged.

Product Application: This product should be applied with helicopter or surface application equipment in a minimum of 2 gallons of water per acre. When applying by helicopter, follow directions under Aerial Application section of this label; when using surface equipment refer to the Ground Application section.

When applying this product to moving bodies of water applications should be made while traveling upstream to prevent concentration of this herbicide in water. DO NOT apply to bodies of water or portions of bodies of water where emergent and/or floating weeds do not exist.

Large Application Areas / Oxygen Depletion: When application is to be made to target vegetation that covers a large percentage of surface area of impounded water, treating area in strips may avoid oxygen depletion from vegetation decay. Oxygen depletion may result in the suffocation of some sensitive aquatic organisms. If oxygen depletion is a concern, treat no more than 1/2 of the surface area of the water at a time. Wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outward in bands to allow aquatic organisms ability to move into untreated areas.

Avoid washoff of sprayed foliage by recreational boat backwash or spray boat for 1 hour after application.

Apply this product at 1 to 3 quarts per acre depending on weed density and species present. DO NOT exceed the maximum label rate of 1.5 pounds acid equivalent Imazapyr (equivalent to 3 quarts) per acre per year. Use the higher labeled rate for heavy weed pressure. See Aquatic Weeds Controlled and Terrestrial Weeds Controlled sections for specific rates.

This product may be applied as a draw-down treatment in areas described in this label. Apply this product to weeds after water has been drained and allow 14 days before reintroduction of water.

This product will control the following target species as specified in the Use Rates and Application Directions section of the table. Rate instructions are expressed in terms of product volume for broadcast applications and as a percent solution for directed applications including spot treatments. For percent solution applications, DO NOT apply more than 1.5 pounds acid equivalent Imazapyr (equivalent to 3 quarts) per acre per year.

Mixing Guide

% Solution	Product Per Gallon of Mix (oz)
0.25	0.3
0.5	0.6
1.0	1.3
2.0	2.6
3.0	3.8
5.0	6.4

Measuring Chart

128 fluid ounces	=	1 gallon
16 fluid ounces	=	1 pint
8 pints	=	1 gallon
4 quarts	=	1 gallon
2 pints	=	1 quart

Common Name	Scientific Name	Use Rates and Application Directions
Floating Weeds		
*Floating heart	*Nymphodes spp*	2 to 4 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Frogbit	*Limnobium spongia*	1 to 2 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Spatterdock	*Nuphar luteum*	Apply a tank mix of 2 to 4 pints/A of this product +4 to 6 pints/A glyphosate in 100 GPA water for best control. Ensure 100% coverage of actively growing emergent foliage.
*Water hyacinth	*Eichhornia crassipes*	1 to 2 pints/A applied in 100 GPA water to actively growing foliage.
*Water lettuce	*Pistia stratiotes*	1 to 2 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
Emerged Weeds		
*Alligatorweed	*Alternanthera philoxeroides*	1 to 4 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Arrowhead duck potato	*Sagittaria spp*	1 to 2 pints/A applied to 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Bacopa lemon	*Bacopa spp*	1 to 2 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.

*Use not permitted in California unless otherwise directed by supplemental labeling.

(continued)

Common Name	Scientific Name	Use Rates and Application Directions
Emerged Weeds *(continued)*		
*Parrot feather	*Myriophyllum aquaticum*	Foliage must be above water for sufficient product uptake. Apply 2 to 4 pints/A (0.5% to 1.0% solution) of this product to actively growing emergent foliage.
*Pennywort	*Hydrocotyle spp*	1 to 2 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Pickerelweed	*Pontedena cordata*	2 to 3 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Taro wild Coco yam Dasheen Elephant's ear	*Colocasia esculentum*	4 to 6 pints/A applied in 100 GPA with a high quality sticker adjuvant. Ensure good coverage of actively growing emergent foliage.
*Water chestnut	*Trappa natans*	4 to 6 pints/A applied in 100 GPA with a high quality sticker adjuvant. Ensure good coverage of actively growing emergent foliage.
*Water lily	*Nymphaea odorata*	2 to 3 pints/A applied in 100 GPA water mix. Ensure 100% coverage of actively growing emergent foliage.
*Water primrose	*Ludwigia uruguayensis*	4 to 6 pints/A (1.0% to 1.5% solution). Ensure 100% coverage of actively growing emergent foliage.
Terrestrial/Marginal Weeds		
*Aquatic nightshade Soda apple	*Solanum tampicense*	2 pints/A (0.5% solution) applied to foliage
*Bamboo Japanese	*Phyllostachys spp*	3 to 4 pints/A (0.75% to 1.0% solution) applied to foliage
*Beach vitex	*Vitex rotundifolia*	5% solution + 1% MSO foliar spray. 17% solution stem injection (hack and squirt)
Brazilian pepper Christmasberry	*Schinus terebinthifolius*	2 to 4 pints/A (0.5% to 1.0% solution) applied to foliage
Cattail	*Typha spp*	2 to 4 pints/A (0.5% to 1.0% solution) applied to actively growing green foliage after full leaf elongation. Lower rates will control cattail in the North. Higher rates are needed in the South.
Chinese tallow tree	*Sapium sebiferum*	16 to 24 fl. oz./A applied to foliage
Cogongrass	*Imperata cylindrical*	Burn foliage, till area, then fall spray 2 quarts/A (1.0% solution) of this product+MSO applied to new growth.
Cordgrass prairie	*Spartina spp*	4 to 6 pints/A (1.0% to 1.5% solution) applied to actively growing foliage
*Cutgrass	*Zizaniopsis miliacea*	4 to 6 pints/A (1.0% to 1.5% solution) applied to actively growing foliage
*Elephant grass Napier grass	*Pennisetum purpureum*	3 pints/A (0.75% solution) applied to actively growing foliage
*Flowering rush	*Butomus umbellatus L*	2 to 3 pints/ (0.5% to 0.75% solution) A applied to actively growing foliage
Giant reed Wild cane	*Arundo donax*	4 to 6 pints/A (1.0% to 1.5% solution) applied in spring to actively growing foliage
*Golden bamboo	*Phyllostachys aurea*	3 to 4 pints/A (0.75% to 1.0% solution) applied to foliage when plant is actively growing, before setting seedhead. More foliage will result in greater herbicide uptake, resulting in greater root kill.
Junglerice	*Echinochloa colonum*	3 to 4 pints/A (0.75% to 1.0% solution) applied to actively growing foliage.
Knapweed	*Centaurea spp*	**Russian knapweed:** 2 to 3 pints/A (0.5% to 0.75% solution) +1 quart/A (0.5% solution) MSO fall applied after senescence begins.
Knotweed, Japanese	*Polygonum cuspidatum* *Fallopia japonica*	3 to 4 pints/A (0.75% to 1.0% solution) applied postemergence to actively growing foliage.

*Use not permitted in California unless otherwise directed by supplemental labeling.

(continued)

Common Name	Scientific Name	Use Rates and Application Directions
Terrestrial/Marginal Weeds *(continued)*		
Melaleuca Paperbark tree	*Melaleuca quinquenervia*	• Established stands: apply 6 pints/A (1.5% solution) of this product + 6 pints/A (1.5% solution) glyphosate+spray adjuvant. For best results use 4 quarts/A (2.0% solution) MSO as an adjuvant. • Broadcast foliar control: apply aerially in a minimum of 2 passes at 10 gallons/A applied cross treatment. • Spot treatment: use 25% of this product+25% solution of glyphosate +1.25% MSO in water applied as a frill or stump treatment.
*Nutgrass Kili'p'opu	*Cyperus rotundus*	2 pints/A (0.5% solution) this product+1 quart/A (0.5% solution) MSO applied early postemergence.
*Nutsedge	*Cyperus spp*	2 to 3 pints/A (0.5% to 0.75% solution) postemergence to foliage or preemergence incorporated, nonincorporated preemergence applications will not control.
Phragmites Common reed	*Phragmites australis*	4 to 6 pints/A (1.0% to 1.5% solution) applied to actively growing green foliage after full leaf elongation. Ensure 100% coverage. If stand has a substantial amount of old stem tissue, mow or burn, allow to regrow to approximately 5 feet tall before retreatment. Lower rates will control phragmites in the North, higher rates are needed in the South.
*Poison hemlock	*Conium maculatum*	2 pints/A (0.5% solution) this product+1 quart/A (0.5% solution) MSO applied preemergence to early postemergence to rosette before flowering
Purple loosestrife	*Lynthrum salicana*	1 pint/A (0.25% solution) applied to actively growing foliage.
Reed canarygrass	*Phalaris arundinacea*	3 to 4 pints/A (0.75% to 1.0% solution) applied to actively growing foliage.
Rose swamp	*Rosa palustris*	2 to 3 pints/A (0.5% to 0.75% solution) applied to actively growing foliage.
Russian olive	*Elaeagnus angustifolia*	2 to 4 pints/A (1% solution) applied to foliage.
Saltcedar Tamarisk	*Tamarix spp*	Aerial application: 2 quarts this product+0.25% v/v NIS applied to actively growing foliage during flowering. Spot treatment: Use 1% solution of this product+0.25% v/v NIS and spray to wet foliage. After application, wait at least 2 years before disturbing treated saltcedar. Earlier disturbance can reduce overall control.
Smartweed	*Polygonum spp*	2 pints/A (0.5% solution) applied early postemergence
Sumac	*Rhus spp*	2 to 3 pints/A (0.5% to 0.75% solution) applied to foliage
Swamp morningglory Kangkong Water spinach	*Ipomoea aquatic*	1 to 2 pints/A (0.25% to 0.5% solution) of this product + 1 quart/A (0.5% solution) MSO applied early postemergence
Torpedo grass	*Panicum repens*	4 pints/A (1.0 to 1.5% solution). Ensure good coverage to actively growing foliage.
*White top Hoary cress	*Cardaria draba*	1 to 2 pints/A (0.25% to 0.5% solution) applied in spring to foliage during flowering.
Willow	*Salix spp*	2 to 3 pints/A (0.5% to 0.75% solution) of this product applied to actively growing foliage. Ensure good coverage.

*Use not permitted in California unless otherwise directed by supplemental labeling.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: DO NOT store below 10° F.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:
NOTE: This product is available in multiple containers. Refer to the Net Contents section of this products labeling for the applicable "Nonrefillable" or "Refillable" designation. Follow the container disposal [handling] instructions below that apply to your container type / size.

Nonrefillable Containers 5 Gallons or Less: Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. Triple 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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke.

Nonrefillable containers larger than 5 gallons: Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. If recycling or reconditioning not available, puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke. 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. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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.

Refillable containers larger than 5 gallons: Refillable container. Refill this container with pesticide only. DO NOT reuse this container for any other purpose. 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. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities. If burned stay out of smoke.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR RISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

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

RV100918 [5]

Polaris, AquaNeat, Razor, Patriot and Tahoe are registered trademarks of Nufarm Americas Inc.

All other trademarks are the property of their respective owners.

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: **Polaris® Herbicide**
EPA Reg. No.: 228-534
Product Type: Herbicide

Company Name: Nufarm Americas Inc.
11901 S. Austin Avenue
Alsip, IL 60803
1-800-345-3330

Telephone Numbers: **For Chemical Emergency, Spill, Leak, Fire, Exposure, or Accident,**
Call CHEMTREC Day or Night: 1-800-424-9300
For Medical Emergencies Only, Call 1-877-325-1840

This product is an EPA FIFRA registered pesticide. Some classifications on this SDS are not exactly the same as on the FIFRA label. Certain sections are superseded by federal law governed by EPA for a registered pesticide. Please see Section 15. REGULATORY INFORMATION for explanation.

2. HAZARDS IDENTIFICATION

PHYSICAL HAZARDS:
Not hazardous

HEALTH HAZARDS:
Not hazardous

ENVIRONMENTAL HAZARDS:
Not hazardous

SIGNAL WORD:
None Required

HAZARD STATEMENTS:
Not hazardous in accordance with 29CFR 1910.1200 (Hazcom 2012)

PRECAUTIONARY STATEMENTS
Use with appropriate protective equipment.

3. COMPOSITION / INFORMATION ON INGREDIENTS

COMPONENTS	CAS NO.	% BY WEIGHT
Isopropylamine Salt of Imazapyr	81510-83-0	22 – 23.3
Other Ingredients	Trade Secret	Trade Secret

Synonyms: 2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid

Ingredients not precisely identified are proprietary or non-hazardous. Values are not product specifications.

4. FIRST AID MEASURES

If Inhaled: Move person to fresh air. Seek medical attention if symptoms develop.
If in Eyes: Hold eye open and rinse slowly and gently with water for sever minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Seek medical attention if irritation persists.
If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water Seek medical attention if irritation persists.
If Swallowed: 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. Seek medical attention if symptoms develop
Most Important symptoms/effects, acute and delayed: None expected.

Indication of Immediate medical attention and special treatment if needed: Immediate medical attention is not generally required. For ingestion there is no specific antidote available. Treat symptomatically.

5. FIRE FIGHTING MEASURES

Extinguishing Media: Use media that is suitable for the surrounding fire.
Special Fire Fighting Procedures: Firefighters should wear NIOSH approved self-contained breathing apparatus and full fire-fighting turn out gear. Dike area to prevent runoff and contamination of water sources. Dispose of fire control water later.
Unusual Fire and Explosion Hazards: This product is not flammable or combustible. If water is used to fight fire, contain runoff, using dikes to prevent contamination of water supplies. Dispose of fire control water later.
Hazardous Decomposition Materials (Under Fire Conditions): May produce gases such as oxides of carbon, hydrogen and nitrogen.

6. ACCIDENTAL RELEASE MEASURES

Personal Precautions: Wear appropriate protective gear for the situation. See Personal Protection information in Section 8.
Environmental Precautions: Prevent material from entering public sewer systems or any waterways. Do not flush to drain. Large spills to soil or similar surfaces may necessitate removal of topsoil. The affected area should be removed and placed in an appropriate container for disposal.
Methods for Containment: Dike spill using absorbent or impervious materials such as earth, sand or clay. Collect and contain contaminated absorbent and dike material for disposal.
Methods for Cleanup and Disposal: Pump any free liquid into an appropriate closed container. Absorb residues with an inert material and place in a suitable container for disposal. Decontaminate tools and equipment following cleanup. See Section 13: DISPOSAL CONSIDERATIONS for more information.
Other Information: Large spills may be reportable to the National Response Center (800-424-8802) and to state and/or local agencies.

7. HANDLING AND STORAGE

HANDLING:
Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. 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.

Spray solutions of this product should be mixed, stored, and applied only in stainless steel, fiberglass, plastic, and plastic-lined steel containers. DO NOT mix, store, or apply this product or spray solutions of this product in unlined steel (except stainless steel) containers or spray tanks.

STORAGE:
Do not store below 10° F. Do not contaminate water, food, or feed by storage or disposal.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Engineering Controls:
Where engineering controls are indicated by specific use conditions or a potential for excessive exposure, use local exhaust ventilation at the point of generation.

Personal Protective Equipment:
Eye/Face Protection: To avoid contact with eyes, wear chemical goggles or shielded safety glasses. **Skin Protection:** To avoid contact with skin wear long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves made of any waterproof material Washing facilities should be readily accessible to the work area.
Respiratory Protection: Not normally required. If vapors or mists exceed acceptable levels, wear NIOSH approved air-purifying respirator with cartridges/canisters approved for use against pesticides.
General Hygiene Considerations: Personal hygiene is an important work practice exposure control measure and the following general measures should be taken when working with or handling this material: 1) do not store, use and/or consume foods, beverages, tobacco products, or cosmetics in areas where this material is stored; 2) wash hands and face carefully before eating, drinking, using tobacco, applying cosmetics or using the toilet.

Exposure Guidelines:

	OSHA		ACGIH		
Component	**TWA**	**STEL**	**TWA**	**STEL**	**Unit**
Imazapyr	NE	NE	NE	NE	
Other Ingredients	NE	NE	NE	NE	

NE = Not Established

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance:	Blue liquid
Odor:	Faint ammonia like
Odor threshold:	No data available
pH:	6.26 (1% w/w dilution in DIW)
Melting point:	No data available
Initial boiling point and boiling range	No data available
Flash point:	>212º F (>100º C)
Evaporation rate:	No data available
Flammability (solid, gas):	No data available
Upper/lower flammability or explosive limits:	No data available
Vapor pressure:	No data available
Vapor density:	No data available
Relative density:	1.057 g/mL @ 20º C
Solubility(ies):	No data available
Partition coefficient: n-octanol/water:	No data available
Autoignition temperature:	No data available
Decomposition temperature:	No data available
Viscosity:	3.766 cSt @20º C; 1.988 cSt @ 40º C
VOC Emission Potential (%):	-0.13 (TGA)

Note: Physical data are typical values, but may vary from sample to sample. A typical value should not be construed as a guaranteed analysis or as a specification.

10. STABILITY AND REACTIVITY

Reactivity: Not reactive.
Chemical Stability: This material is stable under normal handling and storage conditions.
Possibility of Hazardous Reactions: Will not occur
Conditions to Avoid: Excessive heat. Do not store near heat or flame. Do not mix or store this product or solutions of this product in unlined steel containers
Incompatible Materials: Strong oxidizing agents: bases and acids.
Hazardous Decomposition Products: Under fire conditions may produce gases such as oxides of carbon, hydrogen and nitrogen.

11. TOXICOLOGICAL INFORMATION

Likely Routes of Exposure: Eye contact, Skin contact
Eye Contact: Minimally irritating. May cause irritation, redness and tearing.
Skin Contact: Slightly toxic and no more than mildly irritating based on toxicity studies.
Ingestion: Low toxicity based on toxicity studies.
Inhalation: Low toxicity based on toxicity studies.
Delayed, immediate and chronic effects of exposure: None expected.
Toxicological Data:
Data from laboratory studies conducted on Imazapyr Technical:
Oral: Rat LD_{50}: >5,000 mg/kg
Dermal: Rabbit LD_{50}: >5,000 mg/kg
Inhalation: Rat 4-hr LC_{50}: >2.07 mg/l (no mortalities highest dose attainable)
Eye Irritation: Rabbit: Minimally irritating (MMTS= 6.0)
Skin Irritation: Rabbit: Slightly irritating (PDII=0.8)
Skin Sensitization: Not a contact sensitizer in guinea pigs following repeated skin exposure.

Subchronic (Target Organ) Effects: For imazapyr, no adverse effects at approximately 1,700 mg/kg/day (highest dose tested).
Carcinogenicity / Chronic Health Effects: Imazapyr did not cause cancer in laboratory animals. EPA has classified imazapyr as a Group E (evidence of non-carcinogenicity for humans) carcinogen.
Reproductive Toxicity: The results of animal studies with imazapyr gave no indication of a fertility impairing effect.
Developmental Toxicity: No indications of a developmental toxic / teratogenic effect were seen in animal studies with imazapyr.
Genotoxicity: For imazapyr, no mutagenic effect was found in various tests with microorganisms and mammals.

Assessment Carcinogenicity: None listed with ACGIH, IARC, NTP or OSHA.

12. ECOLOGICAL INFORMATION

Ecotoxicity:
Data on Imazapyr:

96-hour LC_{50} Bluegill:	>100 mg/l	Bobwhite Quail 8-day Dietary LC_{50}:	>5,000 ppm
96-hour LC_{50} Rainbow Trout:	>100 mg/l	Bobwhite Quail Oral LD_{50}:	>2,150 mg/kg
48-hour EC_{50} Daphnia:	>100 mg/l	Mallard Duck 8-day Dietary LC_{50}:	>5,000 ppm
14-day EC_{50} Duckweed:	0.024 mg/l	Mallard Duck Oral LD_{50}:	>2,150 mg/kg
7-day EC_{50} Green Algae:	71 mg/l	Honey Bee LD_{50}:	>100 mg/bee

Environmental Fate:
Imazapyr is degraded by microbial metabolism and can be relatively persistent in soils. It has an average half-life in soils that ranges from 2 weeks to 5 months. Half-lives tend to be shorter in forest litter and soils. Imazapyr is water-soluble and variably binds to organic materials in the soils. Although the potential to leach is high, leaching is limited under typical field conditions. In water, imazapyr can be rapidly degraded by photolysis with a half-life averaging 2 days. Due to its rapid photodegradation by sunlight, water contamination by imazapyr is generally not of concern.

13. DISPOSAL CONSIDERATIONS

Waste Disposal Method:
Pesticide wastes are acutely hazardous. 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 Handling and Disposal:

Nonrefillable Containers 5 Gallons or Less: Nonrefillable container. Do not reuse or refill this container. Triple 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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke.

Nonrefillable containers larger than 5 gallons: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. 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. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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.

Refillable containers larger than 5 gallons: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. 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. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

14. TRANSPORTATION INFORMATION

Follow the precautions indicated in Section 7: HANDLING AND STORAGE of this SDS.

DOT
Not Regulated

IMDG
Not Regulated

IATA
Not Regulated

15. REGULATORY INFORMATION

EPA FIFRA INFORMATION

This chemical is a pesticide product registered by the United States Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets (SDS), and for workplace labels of non-pesticide chemicals. The hazard information required on the pesticide label is reproduced below. The pesticide label also includes other important information, including directions for use.

CAUTION. No human or domestic animal hazard statements are required. Follow instructions for Personal Protective Equipment and User Safety Recommendations.

U.S. FEDERAL REGULATIONS

TSCA Inventory: This product is exempted from TSCA because it is solely for FIFRA regulated use.

SARA Hazard Notification/Reporting:
Hazard Categories Under Criteria of SARA Title III Rules (40 CFR Part 370):
Not hazardous

Section 313 Toxic Chemical(s):
None

Reportable Quantity (RQ) under U.S. CERCLA:
None

RCRA Waste Code:
Under RCRA, it is the responsibility of the product user to determine at the time of disposal, whether a material containing the product or derived from the product should be classified as a hazardous waste.

State Information:
Other state regulations may apply. Check individual state requirements.

California Proposition 65: Not Listed.

16. OTHER INFORMATION

National Fire Protection Association (NFPA) Hazard Rating:
Rating for this product: Health: 1 **Flammability:** 0 **Reactivity:** 0
Hazards Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe

This Safety Data Sheet (SDS) serves different purposes than and DOES NOT REPLACE OR MODIFY THE EPA-ACCEPTED PRODUCT LABELING (attached to and accompanying the product container). This SDS provides important health, safety and environmental information for employers, employees, emergency responders and others handling large quantities of the product in activities generally other than product use, while the labeling provides that information specifically for product use in the ordinary course.

Use, storage and disposal of pesticide products are regulated by the EPA under the authority of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) through the product labeling, and all necessary and appropriate precautionary, use, storage, and disposal information is set forth on that labeling. It is a violation of Federal law to use a pesticide product in any manner not prescribed on the EPA-accepted label.

Although the information and recommendations set forth herein (hereinafter “Information”) are presented in good faith and believed to be correct as of the date hereof, Nufarm Americas Inc. makes no representations as to the completeness or accuracy thereof. Information is supplied upon the condition that the persons receiving same will make their own determination as to its suitability for their purposes prior to use. In no event will Nufarm Americas Inc. be responsible for damages of any nature whatsoever resulting from the use of or reliance upon Information. NO REPRESENTATIONS OR WARRANTIES, EITHER EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR OF ANY OTHER NATURE ARE MADE HEREUNDER WITH RESPECT TO INFORMATION OR THE PRODUCT TO WHICH INFORMATION REFERS AND ALL SUCH WARRANTIES ARE HEREBY SPECIFICALLY DISCLAIMED.

Date of Issue: April 12, 2015 **Supersedes:** October 16, 2013

Polaris is a registered trademark of Nufarm Americas Inc.

Specimen Label

Dow AgroSciences

Milestone®

SPECIALTY HERBICIDE

®Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

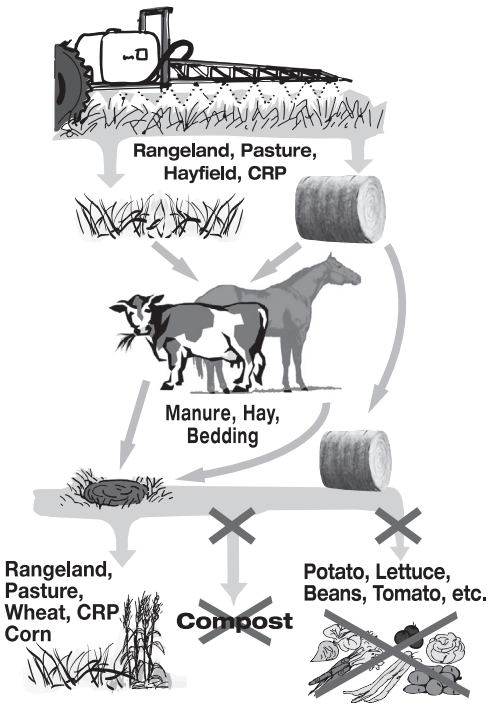
- **For control of annual and perennial broadleaf weeds including invasive and noxious weeds, certain annual grasses, and certain woody plants and vines, on:**
  - **rangeland, permanent grass pastures (including grasses grown for hay*), Conservation Reserve Program (CRP)**
  - **non-crop areas for example, airports, barrow ditches, communication transmission lines, electric power and utility rights-of-way, fencerows, gravel pits, industrial sites, military sites, mining and drilling areas, oil and gas pads, non-irrigation ditch banks, parking lots, petroleum tank farms, pipelines, roadsides, railroads, storage areas, dry storm water retention areas, substations, unimproved rough turf grasses; and**
  - **natural areas (open space) for example, campgrounds, parks, prairie management, trailheads and trails, recreation areas, wildlife openings, and wildlife habitat and management areas including seasonally dry flood plains, deltas, marshes, pairie potholes, or vernal pools;**
  - **including grazed areas in and around these sites.**

***Hay from grass treated with Milestone within the preceding 18-months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling**

IMPORTANT USE PRECAUTIONS AND RESTRICTIONS TO PREVENT INJURY TO DESIRABLE PLANTS

- Carefully read the section ***"Restrictions in Hay or Manure Use ."***
- It is mandatory to follow the ***"Use Precautions and Restrictions"*** section of this label.
- Manure and urine from animals consuming grass or hay treated with this product may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- Hay can only be used on the farm or ranch where product is applied unless allowed by supplemental labeling.
- Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions". **Call [1-(800) 263-1196] Customer Information Group**.

Forage and Manure Management



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Not for Sale, Sale into, Distribution, and/or Use in Nassau and Suffolk counties of New York State.
Not For Sale, Distribution, or Use in the San Luis Valley of Colorado.

GROUP	4	HERBICIDE

Active Ingredient:
Triisopropanolammonium salt of 2-pyridine carboxylic acid, 4-amino-3,6-dichloro-..... 40.6%
Other Ingredients 59.4%
Total 100.0%

Acid Equivalent: aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) - 21.1% - 2 lb/gal

Container Use Directions

1 - Tip

Tilt container to angle as shown and fill head to desired amount – use vertical scale for measuring. Container should be closed.

2 - Level

Hold container up-right and check the amount for accuracy. Add or subtract as needed, using pour-back scale as guide.

3 - Dispense

Remove cap on head and pour into sprayer or other devices. No fluid will pour from the main container. Replace cap for storage in sealed condition.

Precautionary Statements

Hazards to Humans and Domestic Animals

EPA Reg. No. 62719-519

CAUTION

Causes Moderate Eye Irritation

Avoid contact with eyes or clothing.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:
- Long-sleeved shirt and long pants
- 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.

User Safety Recommendations

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.
- 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.

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. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

Do not apply directly to water. Take care to minimize the incidental overspray along the shoreline when applying to terrestrial plants at the water's edge or to water in areas where surface water is present. Do not apply directly to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Directions for Use

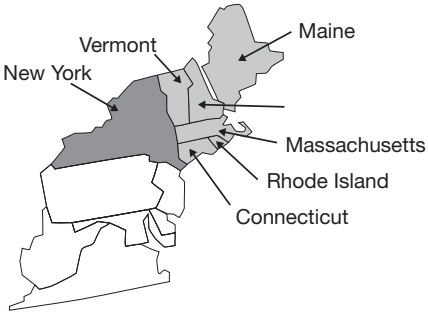
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Read all Directions for Use carefully before applying.

This product is not intended for reformulation or repackaging into other end-use products.

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.

Not for Sale, Sale into, Distribution, and/or Use in Nassau and Suffolk counties of New York State.
Not For Sale, Distribution, or Use in the San Luis Valley of Colorado.

Not for use on pastures in Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. All other labeled uses are permitted in these states including grazed areas in and around these sites.



Grey = states where use in pasture is not permitted

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 48 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 made of any waterproof material as polyethylene or polyvinyl chloride
- Shoes plus socks
- Protective eyewear

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 does not pertain to non-agricultural use on sites, such as, rangeland, permanent grass pastures, or non-cropland. See the Agricultural Use Requirements section below for information where the WPS applies.

Entry Restrictions for Non-WPS Uses: For applications on rangeland and permanent grass pastures (not harvested for hay) and non-cropland areas, do not enter or allow worker entry into treated areas until sprays have dried.

Storage and Disposal

Do not contaminate water, food, feed or fertilizer by storage or disposal. Open dumping is prohibited.
Pesticide Storage: If this product is exposed to subfreezing temperatures, the active ingredient may crystallize and settle out of solution. Under these conditions the product should be warmed to at least 40°F and agitated well to dissolve any crystallized active ingredient prior to use.
Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Nonrefillable containers 5 gallons or less:
Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Storage and Disposal (Cont.)

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 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.

Refillable containers larger than 5 gallons:
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. 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. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers larger than 5 gallons:
Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.
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. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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 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.

Resistance Management Guidelines

- Development of plant populations resistant to this herbicide mode of action is usually not a problem on rangeland, permanent grass pastures, Conservation Reserve Program (CRP), or non-cropland sites since these sites receive infrequent pesticide applications.
- In croplands, use an effective integrated pest management (IPM) program, integrating tillage or other mechanical methods, crop rotation or other cultural control methods into weed control programs whenever practical.
- Similar looking biotypes of a given weed species occurring in a treated area may vary in their susceptibility to a herbicide. Application of a herbicide below its labeled rate may allow more tolerant weeds to survive and a shift to more tolerant biotypes within the treated area.
- Where identified, spreading of resistant weeds to other fields may be prevented by cleaning harvesting and tillage equipment before moving to other areas and by planting weed-free seed.
- Contact your extension specialist, certified crop consultant, or Dow AgroSciences representative for the latest resistance management information.

Use Precautions

- Applications made during periods of intense rainfall, to soils saturated with water, surfaces paved with materials such as asphalt or concrete, or soils through which rainfall will not readily penetrate may result in runoff and movement of Milestone. Injury to crops may result if treated soil and/or runoff water containing Milestone is washed, or moved onto land used to produce crops. Exposure to Milestone may injure or kill susceptible crops and other plants, such as grapes, soybeans, tobacco, sensitive ornamentals.
- **Grass revegetation**:
  - Milestone can be used to control broadleaf plants in grass revegetation programs. Consult Dow AgroSciences' literature for more details about Milestone applications and grass stand establishment.
- **Application before seeding grasses**
  - Milestone can be applied to control broadleaf weeds prior to grass planting. Grass seed germination and seedling development can be adversely effected by many factors such as seed viability and seedling vigor, soil condition (sub-optimal soil temperatures or soil water content), weather after planting, seedbed preparation and seed placement, disease, insects, or animals. Milestone applications will help to reduce competition from weeds and improve the chance for successful grass stand establishment. Some grass species are more sensitive to Milestone; consult Dow AgroSciences' literature for more details.
  - **Postemergence applications on grass:** During the season of establishment, Milestone should be applied only after perennial grasses are well established (have developed a good secondary root system and show good vigor. Most perennial grasses are tolerant to Milestone at this stage of development. Milestone may suppress certain established grasses, such as smooth bromegrass (*Bromus inermis*), especially when plants are stressed by adverse environmental conditions. Plants should recover from this transient suppression with the onset of environmental conditions favorable to grass growth and upon release from weed competition.
- **Seeding Broadleaf Plants (Forbs) and Wildflowers**
  Milestone can be applied in the summer to control broadleaf weeds prior to forb planting. Forbs can be seeded 90 days after a summer application as a dormant fall planting or the following spring. Consult Dow AgroSAciences literature for details.
- **Field Bioassay Instructions:** In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample variability in field conditions such as soil texture, soil organic matter, soil pH, rainfall pattern or drainage. The field bioassay can be initiated one year after the last application of aminopyralid in that field. Observe the test crop for symptoms of herbicidal activity, such as poor stand (effect on seed germination), chlorosis (yellowing), epinasty, and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, do not plant the field to the intended rotational crop; plant only to wheat, forage grasses, native grasses or grasses grown for hay.

Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions." Call (1-800-263-1196) for more information.

Pasture and Rangeland Restrictions

- **Do not use grasses treated with Milestone in the preceding 18-months for hay intended for export outside the United States.**
- **Hay from areas treated with Milestone in the preceding 18-months CAN NOT be distributed or made available for sale off the farm or ranch where harvested unless allowed by supplemental labeling.**
- **Hay from areas treated with Milestone in the preceding 18-months CAN NOT be used for silage, haylage, baylage and green chop unless allowed by supplemental labeling.**
- **Do not move hay made from grass treated with Milestone within the preceding 18-months off farm unless allowed by supplemental labeling.**
- **Do not use hay or straw from areas treated with Milestone within the preceding 18-months or manure from animals feeding on hay treated with Milestone in compost.**
- **Do not use grasses treated with Milestone in the preceding 18-months for seed production.**

Restrictions for All Uses

Maximum Application Rate: On all labeled use sites do not broadcast apply more than 7 fl oz per acre of Milestone per year. The total amount of Milestone applied broadcast, as a re-treatment, and/or spot treatment cannot exceed 7 fl oz per acre per year. Spot treatments may be applied at an equivalent broadcast rate of up to 0.22 lb acid equivalent (14 fl oz of Milestone) per acre per year; however, not more than 50% of an acre may be treated at that rate. Do not apply more than a total of 0.11 lb acid equivalent (7 fl oz) per acre of Milestone per year as a result of broadcast, spot or repeat applications.

Obtain Required Permits: Consult with appropriate state or local water authorities before applying this product around public waters. State or local public agencies may require permits.

- **Avoiding Injury to Non-Target Plants:** Do not aerially apply Milestone within 50 feet of a border downwind (in the direction of wind movement), or allow spray drift to come in contact with, any broadleaf crop or other desirable broadleaf plants, including, but not limited to, alfalfa, cotton, dry beans, flowers, grapes, lettuce, potatoes, radishes, soybeans, sugar beets, sunflowers, tobacco, tomatoes or other broadleaf or vegetable crop, fruit trees, ornamental plants, or soil where sensitive crops are growing or will be planted. Avoid application under conditions that may allow spray drift because very small quantities of spray may seriously injure susceptible crops. Read and consider the "Precautions for Avoiding Spray Drift and Spray Drift Advisory" to help minimize the potential for spray drift.
- **Chemigation:** Do not apply this product through any type of irrigation system.
- **Do not contaminate water intended for irrigation or domestic purposes.** Do not treat inside banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes.
- Do not apply this product to lawns, turf, ornamental plantings, urban walkways, driveways, tennis courts, golf courses, athletic fields, commercial sod operations, or other high-maintenance, fine turfgrass areas, or similar areas.
- Trees adjacent to or in a treated area can occasionally be affected by root uptake of Milestone. Do not apply Milestone within the root zone of desirable trees unless such injury can be tolerated. Use special caution near roses, and leguminous trees such as locusts, redbud, mimosa, and caragana.
- Do not treat frozen soil where runoff could damage sensitive plants.
- **Grazing and Haying Restrictions:** There are no restrictions on grazing or grass hay harvest following application of Milestone at labeled rates. Cutting hay too soon after spraying weeds will reduce weed control. Wait 14 days after herbicide application to cut grass hay to allow herbicide to work. Do not transfer grazing animals from areas treated with Milestone to areas where sensitive broadleaf crops occur without first allowing 3 days of grazing on an untreated pasture. Otherwise, urine and manure may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- **Grazing Poisonous Plants:** Herbicide application may increase palatability of certain poisonous plants. Do not graze treated areas until poisonous plants are dry and no longer palatable to livestock.
- **Restrictions in Hay or Manure Use:**
  - ♦ Do not use aminopyralid-treated plant residues, including grass, wood plants, trees, hay or straw from areas treated within the preceeding 18-months, in compost, mulch wood chips, or mushroom spawn.-
  - ♦ Do not use manure from animals that have eaten aminopyralid-treated forage or hay within the previous 3 days in compost, mulch or mushroom spawn. Livestock must have 3 days of eating non-aminopyralid-treated materials in order to clear their system of aminopyralid. Do not use aminopyralid-treated plants in areas where commercially grown mushrooms or susceptible broadleaf plants may be grown.
  - ♦ Do not spread manure from animals that have consumed aminopyralid-treated forage or hay within the previous 3 days on land used for growing susceptible broadleaf crops.
  - ♦ Manure from animals that have consumed aminopyralid-treated forage or hay within the previous 3 days may only be used on areas used for pasture, grass grown for seed, wheat and corn.
  - ♦ Do not plant a broadleaf crop (including soybeans, sunflower, tobacco, vegetables, field beans, peanuts, and potatoes) in fields or areas treated with aminopyralid or manure from animals that have grazed forage or eaten hay harvested from aminopyralid-treated areas until an adequately sensitive field bioassay is conducted to determine that the aminopyralid concentration in the soil is at level that is not injurious to the crop to be planted.
  - ♦ Do not plant a broadleaf crop in fields or areas treated in the previous year with manure from animals that have consumed aminopyralid-treated forage or hay until an adequately sensitive field bioassay is conducted to determine that the aminopyralid concentration in the soil is at level that is not injurious to the crop to be planted.
  - ♦ To promote herbicide decomposition, plant residues should be evenly incorporated in the surface soil or burned. Breakdown of aminopyralid in plant residues or manure is more rapid under warm, moist soil conditions and may be enhanced by supplemental irrigation.
- **Crop Rotation:** Do not rotate to any crop from rangeland, permanent pasture or CRP acres within one year following treatment. Cereals and corn can be planted one year after treatment. Broadleaf crops are sensitive to aminopyralid residues in the soil and prediction of crop safety by field biassay (see instructions below) is the BEST way to determine planting options. Broadleaf crops such as canola, flax, and alfalfa can require **at least** 2 to 3 years depending on the crop and environmental conditions. More sensitive crops such as soybeans, tobacco, peanuts, potatoes, and peas may require a longer plant back interval and should not be planted until a field bioassay shows that the level of aminopyralid present in the soil will not adversely affect that broadleaf crop.

Precautions for Avoiding Spray Drift

Avoid application under conditions that may allow spray drift because very small quantities of spray, which may not be visible, may injure susceptible crops. This product should be applied only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, non-target crops and other plants) is minimal (e.g., when wind is blowing away from the sensitive areas. A drift control aid may be added to the spray solution to further reduce the potential for drift. If a drift control aid is used, follow the use directions and precautions on the manufacturer's label. Do not use a thickening agent with Microfoil, Thru-Valve booms, or other spray delivery systems that cannot accommodate thickened spray solutions.

Ground Equipment: With ground equipment spray drift can be lessened by keeping the spray boom as low as possible; by applying 10 gallons or more of spray per acre; by keeping the operating spray pressures at the manufacturer's specified minimum pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when the wind velocity is low (follow state regulations). Avoid calm conditions which may be conducive to thermal inversions. Direct sprays no higher than the tops of target vegetation and keep spray pressures low enough to provide coarse spray droplets to minimize drift.

Aerial Application: Avoid spray drift at the application site. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. Users are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications:

1. The boom length must not exceed 75% of the fixed wing span and must be located at least 8 -10 inches below the trailing edge of the fixed wing; the boom length must not exceed 85% of the rotary blade.
2. Nozzles should be pointed backward parallel with the air stream or not pointed downwards more than 45 degrees.

State regulations must be followed.

The applicator should be familiar with and take into account the information covered in the following **Aerial Drift Reduction Advisory**. This information is advisory in nature and does not supersede mandatory label requirements.

Aerial Drift Reduction Advisory

Information on 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 manufacturer's specified pressures. For many nozzle types lower pressure produces larger 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 will provide uniform coverage.

- **Nozzle Orientation** - Orient nozzles so that the spray is released parallel to the airstream to produce larger droplets than other orientations. 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: The distance of the outer most operating nozzles on the boom must not exceed 75% of wingspan or 85% of rotor diameter.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest 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 to 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 such as valleys and ravines 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 local, low level 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 the 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.

Sprayer Clean-Out Instructions

It is recommended to use separate spray equipment on highly sensitive crops such as tobacco, soybeans, potatoes, peanuts and tomatoes.

Do not use spray equipment used to apply Milestone for other applications to land planted to, or to be planted to, broadleaf plants unless it has been determined that all residues of this herbicide have been removed by thorough cleaning of equipment.

Equipment used to apply Milestone should be thoroughly cleaned before reusing to apply any other chemicals as follows:

1. Rinse and flush application equipment thoroughly after use. Dispose of rinse water in non-cropland area away from water supplies.
2. Rinse a second time, adding 1 quart of household ammonia or tank cleaning agent for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15 to 20 minutes). Let the solution stand for several hours, preferably overnight.
3. Flush the solution out of the spray tank through the boom.
4. Rinse the system twice with clean water, recirculating and draining each time.
5. Spray nozzles and screens should be removed and cleaned separately.

- Do not apply this product with mist blower systems that deliver very fine spray droplets. Use of mist blower equipment can reduce control achieved with the herbicide and increase spray drift potential.

Use Information

Apply the specified rate of Milestone as a coarse low-pressure spray. Do not apply this product with mist blower systems that deliver very fine spray droplets. Spray volume should be sufficient to uniformly cover foliage or intended application site. Increase spray volume to ensure thorough and uniform coverage when target vegetation is tall and/or dense. To enhance foliage wetting and coverage, a non-ionic agricultural surfactant or other adjuvant may be added to the spray mixture as specified by the adjuvant label.

Milestone may be applied by ground or aerial application equipment on any registered use site specified on this label.

Ground Broadcast Application: Higher spray volumes (greater than 10 gallons per acre) generally provide better coverage and better control, particularly in dense and/or tall foliage.

Aerial Broadcast Application: Do not apply less than 2 gallons per acre total spray volume. Five gallons per acre or greater will generally provide better coverage and better control, particularly in dense and/or tall foliage.

High-Volume Foliar Application: High volume foliar treatments may be applied at rates equivalent to a maximum of 7 fl oz per acre per year. Use sufficient spray volume to thoroughly and uniformly wet foliage and stems.

For basal bark and cut stubble and all types of cut surface applications, see woody plant section.

Low-Volume Foliar Treatment

To control susceptible woody plants, use Milestone alone or in tank mixes with other herbicides in water. The spray concentration of Milestone tank mixes and total spray volume per acre should be adjusted according to the size and density of target woody plants and type of spray equipment used. With low-volume application, use sufficient spray volume to obtain uniform coverage of target plants including the surfaces of all foliage, stems, and root collars.

For best results, an adjuvant should be added to all spray mixtures. Match equipment and delivery rate of spray nozzles to height and density of woody plants. When treating tall, dense brush, a truck mounted spray gun with spray tips that deliver up to 2 gallons per minute at 40 to 60 psi may be required. Backpack or other types of specialized spray equipment with spray tips that deliver less than 1 gallon of spray per minute may be appropriate for short, low to moderate density brush.

Spot Application: Spot treatments may be applied at an equivalent broadcast rate of up to 0.22 lb acid equivalent (14 fl oz of Milestone) per acre per year; however, not more than 50% of an acre may be treated at that rate. Do not apply more than a total of 0.11 lb acid equivalent (7 fl oz) per acre of Milestone per year as a result of broadcast, spot or repeat applications.) Spray volume should be sufficient to thoroughly and uniformly wet weed foliage, but not to the point of runoff. Repeat treatments may be made, but the total amount of Milestone applied must not exceed 7 fl oz per acre per year. To prevent misapplication, spot treatments should be applied with a calibrated sprayer with a known volume per acre**.** Table 1 shows Milestone amount to mix for various sprayer outputs in gallons per acre (GPA)

Table 1: Amount of Milestone **(in mL)** to mix in **1 gallon of water**

Gallons per acre	Milestone amount (in mL) to mix to achive target application rates		
GPA	**5 fl oz/a**	**7 fl oz/a**	**14 fl oz/a**
20	7.5	10.5	21.0
30	5.0	7.0	14.0
40	3.8	5.3	10.5
50	3.0	4.2	8.4
60	2.5	3.5	7.0
70	2.1	3.0	6.0
80	1.9	2.6	5.3
90	1.7	2.3	4.7
100	1.5	2.1	4.2

Use a syringe to measure cc

Note: Table 1 above shows mixes for various sprayer outputs in gallons per acre (GPA).

Conversions:

1 tsp = 5 mL 30 ml = 1 fluid ounce 1 cc = 1 mL
3 tsp = 1 Tbsp 2 Tbsp = 1 fluid ounce

Mixing Instructions

Mixing with Water: To prepare the spray, add about half the required amount of water in the spray tank. Then, with agitation, add the specified amount of Milestone and other herbicides, if tank mixing. Finally, with continued agitation, add the rest of the water and additives such as adjuvants, surfactants or drift control and deposition aids.

Addition of Surfactants or Adjuvants on All Labled Use Sites: The addition of a high quality non-ionic surfactant (of at least 80% active principal) or adjuvant at 0.25 to 0.5 % volume per volume (1 to 2 quarts per 100 gallons of spray) is recommended to enhance herbicide activity under adverse environmental conditions (such as, high temperature, low relative humidity, drought conditions, dusty plant surfaces) or when weeds are heavily pubescent or more mature.

Tank Mixing with Other Herbicides: Milestone may be applied in tank mix combination with labeled rates of other herbicides provided: (1) the tank mix product is labeled for the timing and method of application for the use site to be treated and (2) mixing is not prohibited by the label of the tank mix product(s), and (3) that the tank mix combination is physically compatible (see tank mix compatibility testing below). When tank mixing, use only in accordance with the restrictions, precautions and limitations on the respective product labels.

- It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.
- Do not exceed specified application rates. If products containing the same active ingredient are mixed, do not exceed the maximum allowable active ingredient use rates.
- For direct injection or other spray equipment where the product formulations will be mixed in undiluted form, special care should be taken to ensure tank mix compatibility.
- Always perform a jar test to ensure the compatibility of products to be used in tank mixture.

Tank Mix Compatibility Testing: Perform a jar test prior to mixing in a spray tank to ensure compatibility of Milestone and other pesticides or carriers. Use a clear glass jar with lid and mix ingredients in the same order and proportions as will be used in the spray tank. The mixture is compatible if the materials mix readily when the jar is inverted several times. The mixture should remain stable after standing for 1/2 hour or, if separation occurs, should readily remix if agitated. An incompatible mixture is indicated by separation into distinct layers that do not readily remix when agitated and/or the presence of flakes, precipitates, gels, or heavy oily film in the jar. Use of an appropriate compatibility aid may resolve mix incompatibility. If the mixture is incompatible do not use that tank mix partner in tank mixtures.

Invert emulsion spray mixtures
Milestone can be applied in an invert emulsion using oil and an appropriate inverting agent. Follow label directions of the inverting agent.

Mixing with Sprayable Liquid Fertilizer Solutions: Milestone is usually compatible with liquid fertilizer solutions. It is anticipated that Milestone will not require a compatibility agent for mixing with fertilizers; however, a compatibility test (jar test) should be made prior to mixing. Jar tests are particularly important when a new batch of fertilizer or pesticide is used, when water sources change, or when tank mixture ingredients or concentrations are changed. Compatibility may be determined by mixing the spray components in the desired order and proportions in a clear glass jar before large scale mixing of spray components in the spray tank.

Note: The lower the temperature of the liquid fertilizer, the greater the likelihood of mixing problems. Use of a compatibility aid may be required if Milestone is mixed with a 2,4-D-containing product and liquid fertilizer. **Mixing Milestone and 2,4-D in N-P or N-P-K liquid fertilizer solutions is more difficult than mixing with straight nitrogen fertilizer and should not be attempted without first conducting a successful compatibility jar test.** Agitation in the spray tank must be vigorous to be comparable with jar test agitation. Apply the spray mixture the same day it is prepared while maintaining continuous agitation. Rinse the spray tank thoroughly after use.

Note: Foliar-applied liquid fertilizers themselves can cause yellowing of the foliage of forage grasses and other vegetation.

Use Rates and Timing

Milestone may be applied as a broadcast spray by ground or aerial equipment or as a spot application to control weeds including, but not limited to, those listed on this label. When a rate range is given use the higher rate to control weeds at advanced growth stages, or under less than favorable growing conditions, or for longer residual control. Best results are obtained when spray volume is sufficient to provide uniform coverage of treated weeds. For optimum uptake and translocation of Milestone, avoid mowing, haying, shredding, burning or soil disturbance in treated areas for at least 14 days following application.

Milestone provides post emergence control and premergence control of emerging seedlings of susceptible weeds, and re-growth of certain perennial weeds following application. Preventing establishment of weeds will depend upon application rate, season of application, and environmental conditions after application.

Milestone can provide long-term control of susceptible weeds. The length of control is dependent upon the application rate, condition and growth stage of target weeds, environmental conditions at and following application, and the density and vigor of competing desirable vegetation. Long-term weed control is most effective where grass vegetation is allowed to recover from overgrazing, drought, etc., and compete with weeds.

Milestone can be an important component of integrated vegetation management programs designed to renovate or restore desired plant communities. To maximize and extend the benefits of weed control provided by Milestone, it is important that other vegetation management practices, including proper grazing management, biological control agents, replanting, fertilization, prescribed fire, etc., be used in appropriate sequences and combinations to further alleviate the adverse effects of weeds on desirable plant species and to promote development of desired plant communities. Agricultural and natural resources specialists with federal and state government agencies can provide guidance on best management practices and development of integrated vegetation management programs.

Plants Controlled

The following weeds and woody plants will be controlled with the rates of Milestone indicated below (table 2). For best results, most weeds and woody plants should be treated when they are actively growing and under conditions favorable for growth. Use a higher rate in the rate range when growing conditions are less than favorable or when weed foliage is tall and dense, or when optimal longer term residual control is desired. Milestone also provides preemergence control of germinating seeds or seedlings of susceptible weeds following application.

Table 2: Weeds and Woody Plants Controlled
Note: Numbers in parentheses (-) refer to specific use directions for a particular weeds species.

Common Name	Scientific Name	Rate Range (fl oz/acre)	Life Cycle	Plant Family
amaranth, spiny	*Amaranthus spinosus*	4 to 7	annual	Amaranthaceae
bedstraw	*Galium spp.*	4 to 7	perennial	Rubiaceae
beggarticks	*Bidens spp.*	4 to 7	annual	Asteracea
broomweed, annual	*Amphiachyris dracunculoides*	4 to 7	annual	Asteraceae
burdock, common	*Arctium minus*	4 to 7	biennial	Asteraceae
buttercup, hairy	*Ranunculus sardous*	4 to 7	annual	Ranunculaceae
buttercup, tall	*Ranunculus acris*	4 to 7	perennial	Ranunculaceae
buttercup spp	*Ranunculus spp*	4 to 7	various	Ranunculaceae
camelthorn	*Alhagi pseudalhagi*	5 to 7	perennial	Fabaceae
cat's ear, common	*Hypochaeris radicata*	5 to 7	perennial	Asteracea
cat's ear	*Hypochaeris spp*	5 to 7	perennial	Asteracea
chamomile, scentless	*Matricaria inodora*	4 to 7	annual	Asteraceae
chicory	*Cichorium intybus*	4 to 6	perennial	Asteraceae
chickweed	*Stellaria media*	7	annual	Caryophyllaceae

Table 2: Weeds and Woody Plants Controlled (Cont.)
Note: Numbers in parentheses (-) refer to specific use directions for a particular weeds species.

Common Name	Scientific Name	Rate Range (fl oz/acre)	Life Cycle	Plant Family
cinquefoil, sulfur (1)	*Potentilla recta*	4 to 7	perennial	Rosaceae
cocklebur	*Xanthium strumarium*	3 to 5	annual	Asteraceae
clover	*Trifolium spp.*	5 to 7	perennial	Fabaceae
crazyweed	*Oxytropisp*	5 to 7	perennial	Fabaceae
croton, tropic	*Croton glandulosus*	3 to 5	annual	Euphorbiaceae
crownvetch	*Securigera varia*	5 to 7	perennial	Fabaceae
cudweed, purple	*Gamochaeta purpurea*	4 to 7	annual	Asteraceae
daisy, oxeye (1)	*Leucanthemum vulgare*	4 to 7	perennial	Asteraceae
dock, curly	*Rumex crispus*	4 to 7	perennial	Polygonaceae
evening primrose, cutleaf	*Oenothera laciniata*	4 to 7	annual	Onagraceae
fiddleneck	*Amsinckia spp*	4 to 7	annual	Boraginaceae
fireweed	*Epilobium angustifolium*	5 to 7	perennial	Onagraceae
fleabane, flax-leaf	*Conyza bonariensis*	4 to 7	annual	Asteraceae
fleabane, hairy	*Conyza bonariensis*	5-7	annual/biennial	Asteraceae
hawkweed, orange (2)	*Hieracium aurantiacum*	4 to 7	perennial	Asteraceae
hawkweed, yellow (2)	*Hieracium caespitosum*	4 to 7	perennial	Asteraceae
henbane, black	*Hyoscyamus niger*	5 to 7	annual/biennial	Solanaceae
henbit	*Lamium amplexicaule*	5 to 7	annual/ biennial	Lamiaceae
hogweed, giant	*Heracleum mantegazzianum*	7	perennial	Apiaceae
horsenettle, Carolina	*Solanum carolinense*	4 to 7	perennial	Solanaceae
horseweed (marestail)	*Conyza canadensis*	4 to 7	annual	Asteraceae
ironweed, tall	*Vernonia gigantea*	5 to 7	perennial	Asteraceae
ironweed, western	*Vernonia baldwinii*	7	perennial	Asteraceae
knapweed, diffuse (3)	*Centaurea diffusa*	5 to 7	biennial/ perennial	Asteraceae
knapweed, meadow	*Centaurea debeauxii*	5 to 7	perennial	Asteraceae
knapweed, Russian (4)	*Acroptilon repens*	5 to 7	perennial	Asteraceae
knapweed, spotted (3)	*Centaurea stoebe*	5 to 7	biennial/ perennial	Asteraceae
knapweed, squarrose	*Centaurea virgata*	5 to 7	biennial/ perennial	Asteraceae
knapweeds	*Centaurea spp.*	5 to 7	biennial/ perennial	Asteraceae
knotweeds, Japanese, bohemian (11)	*Reynoutria japonica*	7-14	perennial	Polygonaceae
kudzu	*Pueraria montana*	7	perennial	Fabaceae
lady's thumb	*Polygonum persicaria*	3 to 5	annual	Polygonaceae
lambsquarters	*Chenopodium album*	5 to 7	annual	Chenopodiaceae
lespedeza, annual	*Lespedeza striata*	5 to 7	annual	Fabaceae
licorice, wild	*Glycyrrhiza lepidota*	7	perennial	Fabaceae
locoweed	*Astragalus spp.*	5 to 7	perennial	Fabaceae
locust, black	*Robinia pseudoacacia*	7	woody perennial	Fabaceae
locust, honey	*Gleditsia triacanthos*	7	woody perennial	Fabaceae
loosestrife, purple (12)	*Lythrum salicaria*	7-14	perennial	Lythraceae
mayweed, scentless	*Tripleurospermum perforate*	4 to 7	annual	Asteraceae
mayweed, stinking	*Anthemis cotula*	7	annual	Asteraceae
medic, black	*Medicago lupulina*	4 to 7	perennial	Fabaceae
mimosa	*Albizia julibrissin*	7	woody perennial	Fabaceae
mullein (5)	*Verbascum spp.*	7	biennial	Scrophulariaceae
nightshade, silverleaf	*Solanum elaeagnifolium*	4-7	perennial	Solanaceae
oxtongue, bristly	*Picris echioides*	5 to 7	biennial	Asteraceae
pea, Swainson	*Sphaerophysa salsula*	5-7	perennial	Fabaceae
povertyweed	*Iva axillaris*	5-7	perennial	Asteraceae
ragweed, common	*Ambrosia artemisiifolia*	3 to 5	annual	Asteraceae
ragweed, western	*Ambrosia psilostachya*	4 to 7	perennial	Asteraceae
ragweed, giant	*Ambrosia trifida*	4 to 7	annual	Asteraceae
ragwort, tansy	*Senecio jacobaea*	5 to 7	perennial	Asteraceae
redbud	*Cercis Canadensis*	7	woody perennial	Fabaceae

Table 2: Weeds and Woody Plants Controlled (Cont.)
Note: Numbers in parentheses (-) refer to specific use directions for a particular weeds species.

Common Name	Scientific Name	Rate Range (fl oz/acre)	Life Cycle	Plant Family
rush skeletonweed	*Chondrilla juncea*	5 to 7	perennial	Asteraceae
sicklepod	*Cassia obtusifolia*	7	perennial	Fabaceae
smartweed, Pennsylvania	*Polygonum pensylvanicum*	3 to 5	annual	Polygonaceae
sneezeweed, bitter	*Helenium amarum*	4 to 7	annual	Asteraceae
soda apple, tropical (6)	*Solanum viarum*	5 to 7	perennial	Solanaceae
sowthistle, annual	*Sonchus oleraceae*	7	annual	Asteraceae
sowthistle, perennial	*Sonchus arvensis*	3 to 5	perennial	Asteraceae
spanishneedles	*Bidens bipinnata*	4 to 7	annual	Asteraceae
St. Johnswort, common	*Hypericum perforatum*	5 to 7	perennial	Clusiaceae
stiltgrass, Japanese	*Microstegium vimineum*	5-7	annual	Poaceae
starthistle, Malta (7)	*Centaurea melitensis*	3 to 5	annual	Asteraceae
starthistle, purple (7)	*Centaurea calcitrapa*	3 to 5	biennial	Asteraceae
starthistle, yellow (7)	*Centaurea solstitialis*	3 to 5	annual	Asteraceae
sunflower, common	*Helianthus annuus*	4 to 7	annual	Asteraceae
sweetclover, white	*Melilotus albus*	5 to 7	biennial	Fabaceae
sweetclover, yellow	*Melilotus officinalis*	5 to 7	biennial	Fabaceae
teasel	*Dipsacus spp.*	4 to 7	biennial	Dipsacaceae
thistle, artichoke	*Cynara cardunculus*	5 to 7	perennial	Asteracea
thistle, blessed milk	*Silybum marianum*	4-7	biennial	Asteraceae
thistle, bull (8)	*Cirsium vulgare*	3 to 5	biennial	Asteraceae
thistle, Canada (9)	*Cirsium arvense*	5 to 7	perennial	Asteraceae
thistle, woolly distaff	*Carthamus lanatus*	4 to 7	annual	Asteraceae
thistle, Italian	*Carduus pycnocephalus*	7	annual	Asteraceae
thistle, musk (8)	*Carduus nutans*	3 to 5	biennial	Asteraceae
thistle, plumeless (8)	*Carduus acanthoides*	3 to 5	biennial	Asteraceae
thistle, Scotch	*Onopordum acanthium*	5 to 7	biennial	Asteracea
thistle, Russian (preemergence)	*Salsola spp*	7	annual	Chenopodiaceae
tree of heaven	*Ailanthus altissima*	7	perennial	Simaroubaceae
vetch	*Vicia spp.*	3 to 7	perennial	Fabaceae
willoweed, panicle	*Epilobium brachycarpum*	5-7	annual	Onagraceae
wisteria	*Wisteria brachybotris*	7	woody perennial	Fabaceae
wormwood, absinth(10)	*Artemisia absinthium*	6 to 7	perennial	Asteraceae
yarrow, common	*Achillea millefolium*	7	perennial	Asteraceae

(1) **Sulfur cinquefoil or oxeye daisy:** Apply Milestone at 4 to 6 fl oz per acre to plants in the prebud stage of development.
(2) **Orange or yellow hawkweeds:** Apply Milestone at 4 to 7 fl oz per acre to plants in the bolting stage of development.
(3) **Diffuse, spotted, and squarrose knapweeds:** Apply Milestone at 5 to 7 fl oz per acre when plants are actively growing with the optimum time of application occurring from rosette to the bolting stages of development or in the fall. Plants will be controlled by mid-summer and fall applications even though plants may not show any changes in form or stature the year of application.
(4) **Russian knapweed:** Apply Milestone at 5 to 7 fl oz per acre to plants in the spring and summer at early bud to flowering stages and to dormant plants in the fall.
(5) M**ullein**: Apply to the rosette stage
(6) **Tropical soda apple:** Apply Milestone at 5 to 7 fl oz per acre at any growth stage, but application by flowering will reduce seed production potential.
(7) **Malta, purple, and yellow starthistle:** Apply Milestone at 3 to 5 fl oz per acre to plants at the rosette through bolting growth stages.
(8) **Bull, musk, and plumeless thistles:** Apply Milestone at 3 to 5 fl oz per acre in the spring and early summer to rosette or bolting plants or in the fall to seedlings and rosettes. Apply at 4 to 5 fl oz when plants are at the late bolt through early flowering growth stages. 2,4-D at 1 lb ae/acre should be tank-mixed with Milestone starting at the late bud stages
(9) **Canada thistle:** Apply Milestone at 5 to 7 fl oz per acre in the spring after all plants have fully emerged (some may be budding) until the oldest plants are in full flower stage. Use the higher rate when applying to the flower stage. Applications are also effective in the fall before a killing frost. Use higher rates for older/dense stands or for longer residual control.
(10) **Absinth wormwood:** Apply 6 to 7 fl oz per acre before wormwood is 12 inches tall. When applying by air on CRP, coverage is important and a minimum of 3 GPA is specified. Remove old duff and litter by fire or mowing for best results
(11) **Invasive knotweeds:** Japanese, Bohemian, giant knotweeds: Optimum suppression of invasive knotweeds with Milestone herbicide is obtained when applications are made to plants that are at least 3 to 4 feet tall. Results of field trials conducted in the western U.S. indicate that high volume applications (100 gpa or greater) of Milestone at 7 fl oz/A or a spot treatment rate up to 14 fl oz/A applied in summer will provide good control of invasive knotweeds. In the upper Midwest, mowing in summer followed by fall application of Milestone (prior to frost) provided the best control. Infestations of invasive knotweed that are mowed should be allowed to regrow to at least 3 feet in height prior to herbicide treatment. Monitoring and follow-up herbicide treatments on regrowth will be necessary to control resprouts and achieve long-term control.
(12) **Purple loosestrife:** For optimum control apply Milestone at 7 fl oz per acre plus 1 pt to 1 qt of 2,4-D amine or 1 to 2 qts of Garlon 3A. Spot treatments may also be made by applying Milestone at 14 fl oz (see Spot treatment section of the label) with or without the addition of 2,4-D or Garlon 3A.
(13) **Fiddleneck:** For optimum control apply Milestone at 4 to 7 fl oz per acre when the plants are young and before flowering. Use higher rates if the plants are older and larger. In California optimal application timing is November through March.

For Control or Suppression of Medusahead Rye

Milestone applied broadcast at 7 to14 fl oz/A can suppress or control medusahead rye (*Taeniatherum caput-medusae)* and downy brome *(Bromus tectorum,* also called cheatgrass*).* The key to optimum results is the timing of application. Applications should be made in late summer prior to rains and seed germination in order to provide the best possibility of suppression or control. In general, control or suppression will be poor if any of the seeds have germinated prior to application even if they have not yet emerged through the soil surface. Tank mixes with Accord XRT II at 12 fl oz/A, where a non-selective herbicide can be used or where desired grasses are dormant and will not be harmed, and will aid in control. Spot treatment restrictions (see spot treatment section) apply for rates above 7 fl oz/A for broadcast applications.

Control of Terrestrial Weeds near and up to the Water's Edge

Milestone can be used to treat terrestrial weeds that extend up to the water's edge. **Do not apply directly to water.** This product must not be used to treat vegetation standing in the water. When controlling terrestrial weed species near and up to the water's edge, take precautions to minimize incidental overspray to the adjacent water. Consult local public water control authorities before applying this product near public waters. Permits may be required to treat such areas. Apply the specified rate, listed in Table 2, of Milestone as a coarse low-pressure spray as ground broadcast or spot applications. Do not apply aerially for control of weeds growing at or near the water's edge. Spray volume should be sufficient to uniformly cover foliage. Increase the spray volume to ensure thorough and uniform coverage when target vegetation is tall and/or dense. It is also permissible to treat target weeds within dry non-irrigation ditches and seasonally dry transitional areas between upland and lowland sites (such as flood plains, deltas, marshes, prairie potholes or vernal pools), but only at times when those sites are dry and are forecasted or managed by water control systems to remain dry for at least 2 weeks following application.

Use Rate Restrictions:
Do not broadcast apply more than 7 fl oz per acre of Milestone per year.

The total amount of Milestone applied broadcast, as a re-treatment, and/or spot treatment cannot exceed 7 fl oz per acre per year. Spot treatments may be applied at an equivalent broadcast rate of up to 0.22 lb acid equivalent (14 fl oz of Milestone) per acre per year; however, not more than 50% of an acre may be treated at that rate. Do not apply more than a total of 0.11 lb acid equivalent (7 fl oz) per acre of Milestone per year as a result of broadcast, spot or repeat applications.

Woody Plant Control

Milestone may be applied to control woody plants by any application method listed on the label on any site listed.

Milestone may be applied alone or in tank-mix combinations with labeled rates of other herbicides provided: (1) the tank mix product is labeled for the timing and method of application for the use site to be treated and (2) mixing is not prohibited by the label of the registered tank mixed products. Use as directed in the Directions of Use section of the tank-mix partner. Follow Mixing Instructions under the General Mixing and Application Instructions section.

Add Milestone to tank mixes for improved brush control on species such as alder, aspen, blackberry, boxelder, cherry, coyote brush, conifers, cottonwood, elm, maple, poplar, oak, brooms (Scotch, Spanish, French, Portuguese), gorse, hackberry, Russian and Autumn olive, salt-cedar.

Low or High Volume Foliar Applications:
For broad spectrum brush control using a foliar application, Milestone may be added to tank mixes with Accord® XRT II, Arsenal Powerline, DMA® 4IVM, Garlon 4 Ultra, Remedy Ultra, Tordon 101M, Transline, Forestry Garlon XRT, or Garlon 3A, Rodeo®, Tordon® K, Tordon 22K or other products labeled for use on the intended site.

Low Volume Basal Bark Applications:
To control susceptible woody plants with stems less than 6 inches in basal diameter, apply herbicide mix (see below for rates) with a backpack or knapsack sprayer using low pressure and a solid cone or flat fan nozzle. Spray the basal parts of brush and tree trunks to a height of 12 to 15 inches from the ground in a manner that thoroughly wets the lower stems but not to the point of runoff. The use of a Spraying Systems Y2 nozzle or similar nozzle is recommended, which will narrow the spray pattern to target individual stems. Herbicide concentration should vary with tree diameter, bark thickness, volume used per acre, and susceptibility of species treated. Apply anytime, including the winter months, except when snow or water prevent spraying to the ground line or when stem surfaces are saturated with water.

Milestone may be used as a low volume basal treatment alone, for sensitive woody species in the Fabaceae family (legumes), or in combination with other products such as Garlon 4 Ultra, Forestry Garlon XRT, Remedy Ultra for broader control of other sensitive woody species. Applications should not exceed the maximum use rate per acre for the site.

Mix Milestone at 0.5 to 5% v/v alone, or with Garlon 4 Ultra or Forestry Garlon XRT in a commercially available basal diluent (or other oils or basal diluents as recommended by the manufacturer); the basal oil should be compatible with a water soluble herbicide such as Milestone. See table 3 to calculate the amount of Milestone that can be applied per acre at the various volumes and rates. Make a stable tank mixture for basal bark application by first combining each product with a compatibility agent prior to final mixing in the desired ratio. If using a tank mix, mix the oil-based products such as Garlon 4 Ultra thoroughly with basal oil and add any other oil-based products before adding the water based products. If the mixture stands for more than 30 minutes, reagitation may be required.

Oil and water based mixtures can separate over time. Long-term storage is not recommended without vigorous agitation prior to use or without a recommended compatibility agent.

Use caution when treating areas adjacent to susceptible and desirable species to avoid root uptake and possible injury when using Milestone or other soil active herbicides

Low Volume Stem Bark Band Treatment
To control susceptible woody plants (see table 2) with stems less than 6 inches in basal diameter, mix 0.5 to 5 gallons of Milestone in enough oil to make 100 gallons of spray mixture. Apply with a backpack or knapsack sprayer using low pressure and a solid cone or flat fan nozzle. Apply the spray in a 6- to 10-inch wide band that completely encircles the stem. Spray in a manner that completely wets the bark, but not to the point of runoff. The treatment band may be positioned at any height up to the first major branch. For best results apply the band as low as possible. Spray mixture concentration should vary with size and susceptibility of species to be treated. Applications may be made anytime, including winter months.

Table 3:

% of Milestone in Basal Mix	Fluid ounces of Milestone by GPA (gallons per acre)						
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
1.0	1.3	2.6	3.8	5.1	6.4	7.7	9.0
1.5	1.9	3.8	5.8	7.7	9.6	11.5	13.4
2.0	2.6	5.1	7.7	10.2	12.8		
2.5	3.2	6.4	9.6	12.8			
3.0	3.8	7.7	11.5				
3.5	4.5	9.0	13.4				
4.0	5.1	10.2					
5.0	6.4	12.8					

within spot treatment labeled rate
in excess of spot treatmentt labeled rate

NOTE: Avoid treating high density of stems adjacent to desirable trees with roots in the treatment zone. See table 4 for guidance on estimated volume per acre by treated stem density. Trees adjacent to or in a treated area can occasionally be affected by root uptake of Milestone. Applications of Milestone within the root zone of desirable trees should not be made unless injury can be tolerated. Severe injury or plant death can occur if used near roses, or leguminous trees such as locusts, redbud, mimosa, and caragana.

Table 4:

Estimated gallons of spray solution per acre for basal bark applications on various stem densities per acre		
	Volume Range	Target Spacing
Number of Stems/Acre	(gal/acre)	(ft between brush/trees)
250	1.0 - 1.7	8.4
500	2.0 - 3.3	5.9
750	3.0 - 5.0	4.9
1000	4.0 - 6.6	4.2
1250	5.0 - 8.3	3.8
1500	5.9 - 9.9	3.4

Cut surface

Apply Milestone in the cut surface applications listed below for control of susceptible tree species such as legumes like Albezia, mimosa, locust, etc. Mixtures of Milestone and Garlon 3A or Garlon 4 Ultra may be effective on species other than legumes such as elm, maple, oak and conifers.

Cut surface applications may be used successfully at any season except during periods of heavy sap flow of certain species - for example, maples in the spring.

Cut-Stump Treatment

Apply Milestone as a 10% dilution v/v in water, by spraying or painting all the exposed cambium layer on the freshly cut surface. The cambium area next to the bark is the most vital area to wet.

With Tree Injector Method

Apply by injecting 1 milliliter of 10% v/v Milestone in water through the bark at intervals of 3 to 4 inches between centers of the injector wound. The injections should completely surround the tree at any convenient height. Note: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is injected directly into plants.

With Hack and Squirt Method

Make cuts around the tree trunk at a convenient height with a hatchet or similar equipment so that the cuts overlap slightly and make a continuous circle around the trunk. Spray 1 milliliter of 10% v/v Milestone in water into the pocket created between the bark and the inner stem/trunk by each cut.

With Frill or Girdle Method

Make a single girdle through the bark completely around the tree at a convenient height. The frill should allow for the herbicide to remain next to the inner stem and absorb into the plant. Wet the cut surface with 10% v/v Milestone in water.

For use in Hawaii only:
Incision Point Application (IPA) also known as Tree Injection or Hack and Squirt

For control of susceptible tree species such as Albezia, and other legumes and susceptible tree species, make cuts around the tree trunk at a convenient height with a machete, hatchet or similar equipment so that the cuts are about 6 inches apart between centers. Inject ½ to 1 milliliter of undiluted Milestone into the pocket created between the bark and the inner stem/trunk by each cut as soon as possible after cutting. The cambium area next to the bark is the most vital area to wet.

Preemergent Weed Control

Typically Milestone is used as a post emergent herbicide but it has preemergent activity on susceptible weeds. Use Milestone as a preemergence spray prior to weed seed germination. Control will depend upon species susceptibility, application timing, and environmental conditions, such as precipitation, following application. When applied at rates lower than 7 fl oz per acre, Milestone can provide short-term control of some susceptible weeds but when applied at 7 fl oz (broadcast) or 14 fl oz (spot treatment), weed control is extended.

Best results for use as a premergent application for total vegetation control are obtained if Milestone at 7 fl oz per acre is tank mixed with other herbicides to broaden the weed spectrum and to control grasses. If grasses and broadleaf weeds tolerant to Milestone are present at the time of application or will germinate on the site, then tank mixtures with other herbicides, such as Accord® XRT II, Rodeo®, Dimension® 2EW or EC (annual grasses), Oust XP, Esplanade, flumioxazin, diuron, or other herbicides labeled for total vegetation control applications.

SPOT TREATMENTS FOR AREAS SUCH AS SUBJECT POLES, SUBSTATIONS, AND OTHER SMALL AREAS

Spot treatments may be applied at an equivalent broadcast rate of up to 0.22 lb acid equivalent (14 fl oz of Milestone) per acre per year to small spots for clearing around utility subject poles to help prevent fire damage, on small substations and other spot areas. To prevent misapplication, spot treatments should be applied with a calibrated sprayer.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. To the extent permitted by law, otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent permitted by law, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

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It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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9330 Zionsville Road
Indianapolis, IN 46268

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EPA accepted 01/30/17

Revisions:

1. Added the following to the use site list in description: "seasonally dry flood plains, deltas, marshes, prairie potholes, or vernal pools."
2. Revised the restriction for New York to read, "Not for Sale, Sale into, Distribution, and/or Use in Nassau and Suffolk counties of New York State."
3. Added the following restriction: "Not For Sale, Distribution, or Use in the San Luis Valley of Colorado."
4. Updated the Use Precautions and Restriction section and divided into two distinct sections.
5. Updated Tank Mixing with Other Herbicides section by adding, "It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture."
6. Added the following use section: Control of Terrestrial Weeds at the Water's Edge

SAFETY DATA SHEET
DOW AGROSCIENCES LLC

Product name: MILESTONE™ Herbicide

Issue Date: 05/26/2015
Print Date: 05/26/2015

DOW AGROSCIENCES LLC encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. IDENTIFICATION

Product name: MILESTONE™ Herbicide

Recommended use of the chemical and restrictions on use
Identified uses: End use herbicide product

COMPANY IDENTIFICATION
DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD
INDIANAPOLIS IN 46268-1053
UNITED STATES

Customer Information Number: 800-992-5994
info@dow.com

EMERGENCY TELEPHONE NUMBER
24-Hour Emergency Contact: 800-992-5994
Local Emergency Contact: 352-323-3500

2. HAZARDS IDENTIFICATION

Hazard classification
This material is not hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.

Other hazards
no data available

3. COMPOSITION/INFORMATION ON INGREDIENTS

This product is a mixture.

Component	CASRN	Concentration
Aminopyralid Triisopropanolamine Salt	566191-89-7	40.6%

Triisopropanolamine	122-20-3	1.5%
Balance	Not available	57.9%

4. FIRST AID MEASURES

Description of first aid measures
General advice: If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Skin contact: 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.

Eye contact: Hold eyes 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 eyes. Call a poison control center or doctor for treatment advice.

Ingestion: No emergency medical treatment necessary.

Most important symptoms and effects, both acute and delayed: Aside from the information found under Description of first aid measures (above) and Indication of immediate medical attention and special treatment needed (below), any additional important symptoms and effects are described in Section 11: Toxicology Information.

Indication of any immediate medical attention and special treatment needed
Notes to physician: No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

5. FIREFIGHTING MEASURES

Suitable extinguishing media: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam.

Unsuitable extinguishing media: no data available

Special hazards arising from the substance or mixture
Hazardous combustion products: Under fire conditions some components of this product may decompose. The smoke may contain unidentified toxic and/or irritating compounds. Combustion products may include and are not limited to: Nitrogen oxides. Hydrogen chloride. Carbon monoxide. Carbon dioxide.

Unusual Fire and Explosion Hazards: This material will not burn until the water has evaporated. Residue can burn.

Advice for firefighters

Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the "Accidental Release Measures" and the "Ecological Information" sections of this (M)SDS.

Special protective equipment for firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). If protective equipment is not available or not used, fight fire from a protected location or safe distance.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures: Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

Environmental precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

Methods and materials for containment and cleaning up: Contain spilled material if possible. Small spills: Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance. See Section 13, Disposal Considerations, for additional information.

7. HANDLING AND STORAGE

Precautions for safe handling: Keep out of reach of children. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin, and clothing. Use with adequate ventilation. Wash thoroughly after handling.

Conditions for safe storage: Store in a dry place. Store in original container. Keep container tightly closed when not in use. Do not store near food, foodstuffs, drugs or potable water supplies.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters
Exposure limits are listed below, if they exist.

Component	Regulation	Type of listing	Value/Notation
Triisopropanolamine	Dow IHG	TWA	10 mg/m3

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING.

Exposure controls
Engineering controls: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations. Local exhaust ventilation may be necessary for some operations.

Individual protection measures

Eye/face protection: Use safety glasses (with side shields).

Skin protection

Hand protection: Chemical protective gloves should not be needed when handling this material. Consistent with general hygienic practice for any material, skin contact should be minimized.

Other protection: No precautions other than clean body-covering clothing should be needed.

Respiratory protection: Respiratory protection should be worn when there is a potential to exceed the exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. For most conditions no respiratory protection should be needed; however, if discomfort is experienced, use an approved air-purifying respirator.
The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	
Physical state	Liquid.
Color	Brown
Odor	Mild
Odor Threshold	no data available
pH	7.3 *pH Electrode*
Melting point/range	Not applicable
Freezing point	< -10 °C (< 14 °F)
Boiling point (760 mmHg)	no data available
Flash point	**closed cup** > 100 °C (> 212 °F) *Pensky-Martens Closed Cup ASTM D 93*
Evaporation Rate (Butyl Acetate = 1)	no data available
Flammability (solid, gas)	Not Applicable
Lower explosion limit	no data available
Upper explosion limit	no data available
Vapor Pressure	no data available
Relative Vapor Density (air = 1)	no data available
Relative Density (water = 1)	1.14 at 20 °C (68 °F)
Water solubility	Soluble
Partition coefficient: n-octanol/water	no data available
Auto-ignition temperature	none below 400 degC
Decomposition temperature	No test data available
Dynamic Viscosity	12.2 cP at 20 °C (68 °F) *EPA OPPTS 830.7100 (Viscosity)*
Kinematic Viscosity	no data available
Explosive properties	no data available
Oxidizing properties	no data available

Liquid Density	1.140 g/cm3 at 20 °C (68 °F) *Digital density meter*
Molecular weight	no data available
Surface tension	54.4 mN/m at20 °C (68 °F)

NOTE: The physical data presented above are typical values and should not be construed as a specification.

10. STABILITY AND REACTIVITY

Reactivity: No dangerous reaction known under conditions of normal use.

Chemical stability: Thermally stable at typical use temperatures.

Possibility of hazardous reactions: Polymerization will not occur.

Conditions to avoid: Some components of this product can decompose at elevated temperatures.

Incompatible materials: Avoid contact with: Strong oxidizers.

Hazardous decomposition products: Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Hydrogen chloride. Nitrogen oxides.

11. TOXICOLOGICAL INFORMATION

Toxicological information appears in this section when such data is available.

Acute toxicity

Acute oral toxicity
Very low toxicity if swallowed. Harmful effects not anticipated from swallowing small amounts.

As product:
LD50, Rat, male and female, > 5,000 mg/kg

Acute dermal toxicity
Prolonged skin contact is unlikely to result in absorption of harmful amounts.

As product:
LD50, Rat, male and female, > 5,000 mg/kg

Acute inhalation toxicity
No adverse effects are anticipated from single exposure to mist. Based on the available data, respiratory irritation was not observed.

As product:
LC50, Rat, male and female, 4 Hour, dust/mist, > 5.79 mg/l

Skin corrosion/irritation
Essentially nonirritating to skin.

Serious eye damage/eye irritation
Essentially nonirritating to eyes.
Corneal injury is unlikely.

Sensitization
Did not cause allergic skin reactions when tested in guinea pigs.

For respiratory sensitization:
No relevant data found.

Specific Target Organ Systemic Toxicity (Single Exposure)
Evaluation of available data suggests that this material is not an STOT-SE toxicant.

Specific Target Organ Systemic Toxicity (Repeated Exposure)
Based on available data, repeated exposures are not anticipated to cause significant adverse effects.

Carcinogenicity
For similar active ingredient(s). Aminopyralid. Did not cause cancer in laboratory animals.

Teratogenicity
Did not cause birth defects or any other fetal effects in laboratory animals.

Reproductive toxicity
For similar active ingredient(s). Aminopyralid. In animal studies, did not interfere with reproduction.

Mutagenicity
In vitro genetic toxicity studies were negative. Animal genetic toxicity studies were negative.

Aspiration Hazard
Based on physical properties, not likely to be an aspiration hazard.

12. ECOLOGICAL INFORMATION

Ecotoxicological information appears in this section when such data is available.

Toxicity

Acute toxicity to fish
Material is practically non-toxic to aquatic organisms on an acute basis (LC50/EC50/EL50/LL50 >100 mg/L in the most sensitive species tested).

LC50, Oncorhynchus mykiss (rainbow trout), static test, 96 Hour, 360 mg/l, OECD Test Guideline 203 or Equivalent

LC50, Cyprinodon variegatus (sheepshead minnow), static test, 96 Hour, > 100 mg/l

Acute toxicity to aquatic invertebrates
EC50, Daphnia magna (Water flea), static test, 48 Hour, > 460 mg/l

LC50, saltwater mysid Mysidopsis bahia, static test, 96 Hour, > 104 mg/l

Acute toxicity to algae/aquatic plants

ErC50, Pseudokirchneriella subcapitata (green algae), 72 Hour, Growth rate inhibition, > 1,000 mg/l, OECD Test Guideline 201 or Equivalent

Toxicity to Above Ground Organisms
Material is practically non-toxic to birds on an acute basis (LD50 > 2000 mg/kg).
Material is practically non-toxic to birds on a dietary basis (LC50 > 5000 ppm).

dietary LC50, Colinus virginianus (Bobwhite quail), > 21422mg/kg diet.

oral LD50, Colinus virginianus (Bobwhite quail), > 10,000 ppm

oral LD50, Apis mellifera (bees), > 460micrograms/bee

contact LD50, Apis mellifera (bees), > 460micrograms/bee

Toxicity to soil-dwelling organisms
LC50, Eisenia fetida (earthworms), 14 d, survival, > 10,000 mg/kg

Persistence and degradability

Aminopyralid Triisopropanolamine Salt
Biodegradability: For similar material(s): Aminopyralid. Material is not readily biodegradable according to OECD/EEC guidelines.

Triisopropanolamine
Biodegradability: Biodegradation under aerobic static laboratory conditions is high (BOD20 or BOD28/ThOD > 40%). Biodegradation rate may increase in soil and/or water with acclimation. Material is not readily biodegradable according to OECD/EEC guidelines.
10-day Window: Fail
Biodegradation: 0 %
Exposure time: 28 d
Method: OECD Test Guideline 301F or Equivalent

Theoretical Oxygen Demand: 2.35 mg/mg

Photodegradation
Test Type: Half-life (indirect photolysis)
Sensitizer: OH radicals
Atmospheric half-life: 3 Hour
Method: Estimated.

Balance
Biodegradability: No relevant data found.

Bioaccumulative potential

Aminopyralid Triisopropanolamine Salt
Bioaccumulation: For similar active ingredient(s). Aminopyralid. Bioconcentration potential is low (BCF < 100 or Log Pow < 3).

Triisopropanolamine

Bioaccumulation: Bioconcentration potential is low (BCF < 100 or Log Pow < 3).
Partition coefficient: n-octanol/water(log Pow): -0.015 at 23 °C Measured
Bioconcentration factor (BCF): < 0.57 Fish. 42 d Measured

Balance

Bioaccumulation: No relevant data found.

Mobility in soil

Aminopyralid Triisopropanolamine Salt

For similar active ingredient(s).
Aminopyralid.
Potential for mobility in soil is very high (Koc between 0 and 50).

Triisopropanolamine

Potential for mobility in soil is very high (Koc between 0 and 50).
Partition coefficient(Koc): 10 Estimated.

Balance

No relevant data found.

13. DISPOSAL CONSIDERATIONS

Disposal methods: If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

14. TRANSPORT INFORMATION

DOT

Not regulated for transport

Classification for SEA transport (IMO-IMDG):

Not regulated for transport

Transport in bulk according to Annex I or II of MARPOL 73/78 and the IBC or IGC Code Consult IMO regulations before transporting ocean bulk

Classification for AIR transport (IATA/ICAO):

Not regulated for transport

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Transportation classifications may vary by container volume and may be influenced by regional or country variations in regulations. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. REGULATORY INFORMATION

OSHA Hazard Communication Standard
This product is not a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312
No SARA Hazards

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313
This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

Pennsylvania (Worker and Community Right-To-KnowAct): Pennsylvania Hazardous Substances List and/or Pennsylvania Environmental Hazardous Substance List:
The following product components are cited in the Pennsylvania Hazardous Substance List and/or the Pennsylvania Environmental Substance List, and are present at levels which require reporting.

Components	CASRN
Triisopropanolamine	122-20-3

Pennsylvania (Worker and Community Right-To-KnowAct): Pennsylvania Special Hazardous Substances List:
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

United States TSCA Inventory (TSCA)
This product contains chemical substance(s) exempt from U.S. EPA TSCA Inventory requirements. It is regulated as a pesticide subject to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements.

Federal Insecticide, Fungicide and Rodenticide Act
EPA Registration Number: 62719-519
This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

CAUTION

Causes moderate eye irritation

16. OTHER INFORMATION

Hazard Rating System
NFPA

Health	Fire	Reactivity
1	1	0

Revision
Identification Number: 101209315 / A211 / Issue Date: 05/26/2015 / Version: 9.0
DAS Code: GF-871
Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

Dow IHG	Dow Industrial Hygiene Guideline
TWA	Time Weighted Average (TWA):

Information Source and References
This SDS is prepared by Product Regulatory Services and Hazard Communications Groups from information supplied by internal references within our company.

DOW AGROSCIENCES LLC urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

Specimen Label

GLYPHOSATE	GROUP	9	HERBICIDE

CORTEVA™ agriscience

Rodeo®

HERBICIDE

® ™ Trademarks of Dow AgroSciences, DuPont or Pioneer and their affiliated companies or respective owners

For control of annual and perennial weeds and woody plants in natural and production (plantations), forests for site preparation, mid-rotation release treatments, timber stand improvement activities, noncrop sites including industrial sites, rights-of-way (including roadsides, electric utility and communication transmission lines, pipelines, railroads, airports), irrigation and drainage ditches, canals, reservoirs, natural areas (including wildlife management areas, wildlife openings, wildlife habitats and refuges, parks and recreational areas, campgrounds, trailheads and trails), rangeland, and in and around aquatic sites and wetlands; also for perennial grass release, and grass growth suppression and grazed areas on these sites.

Avoid contact of herbicide with foliage, green stems, exposed non-woody roots or fruit of crops, desirable plants and trees, because severe injury or destruction may result.

Active Ingredient:
glyphosate† N-(phosphonomethyl)glycine, isopropylamine salt 53.8%
Other Ingredients 46.2%
Total 100.0%

†Contains 5.4 lb per gallon glyphosate, isopropylamine salt (4 lb per gallon glyphosate acid).

Precautionary Statements

Hazards to Humans and Domestic Animals

EPA Reg. No. 62719-324

Keep Out of Reach of Children

CAUTION

Harmful If Inhaled • Avoid breathing spray mist. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:
- Long-sleeved shirt and long pants
- Shoes plus socks.

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

Engineering Controls

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

User Safety Recommendations

Users should:
- 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.

First Aid

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

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants. This oxygen loss can cause fish suffocation.

In case of leak or spill, soak up and remove to a landfill.

Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

Do not mix, store or apply this product or spray solutions of this product in galvanized steel or unlined steel (except stainless steel) containers or spray tanks. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas, which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Read all Directions for Use carefully before applying.

This is an end-use product. Dow AgroSciences does not intend and has not registered it for reformulation.

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 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 made of any waterproof material
- Shoes plus socks

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 people and pets off treated areas until spray solution has dried.

Storage and Disposal

Do not contaminate water, food, feed or seed by storage or disposal.
Pesticide Storage: Store above 10°F (-12°C) to keep product from crystallizing. Crystals will settle to the bottom. If allowed to crystallize, place in a warm room 68°F (20°C) for several days to redissolve and roll or shake container or recirculate in mini-bulk containers to mix well before using.
Pesticide Disposal: Wastes resulting from use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures.

Nonrefillable containers 5 gallons or less:
Container Handling: Nonrefillable container. Do not reuse or refill this container.
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. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Refillable containers larger than 5 gallons:
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. 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. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Nonrefillable containers 5 gallons or larger:
Container Handling: Nonrefillable container. Do not reuse or refill this container.
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. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Product Information

This product is a broad spectrum, systemic, postemergent herbicide with no soil residual activity. It is intended for control of annual and perennial weeds and woody plants and brush. It is formulated as a water soluble liquid.

Time to Symptoms: The active ingredient in this product moves through the plant from the point of foliage contact to and into the root system. Visible effects are a gradual wilting and yellowing of the plant that advances to complete browning of above ground growth and deterioration of underground plant parts. Visible effects on most annual weeds occur within two to four days, but on most perennial weeds visible effects may not occur for seven days or more. Extremely cool or cloudy weather following treatment may slow the activity of this product and delay development of visual symptoms.

Stage of Weeds: Annual weeds are easiest to control when they are small. Best control of most perennial weeds is obtained when treatment is made at late growth stages approaching maturity. Refer to the annual, perennial and woody brush and trees rate tables for specific weeds. Always use the higher rate within the rate range for heavy or dense weed growth or when weeds are growing in an undisturbed (noncultivated) area. When treating weeds with disease or insect damage, weeds heavily covered with dust, or weeds under poor growing conditions, reduced weed control may result.

Cultural Considerations: Reduced control may result when applications are made to annual or perennial weeds that have been mowed, grazed, or cut, and have not been allowed to regrow to the specified stage for treatment.

Rainfastness: Heavy rainfall soon after application may wash off this product from the foliage and a repeat application up to the labled rate may be required for adequate control.

Spray Coverage: For best results, spray coverage should be uniform and complete.

Mode of Action: The active ingredient in this product inhibits an enzyme. This enzyme is found only in plants and microorganisms that are essential to forming specific amino acids.

No Soil Activity: Weeds must be emerged at the time of application to be controlled by this product. Weeds germinating from seed after application will not be controlled. Unemerged plants arising from unattached underground rhizomes or rootstocks of perennials will not be affected by the herbicide and will continue to grow.

Biological Degradation: Degradation of this product is primarily a biological process carried out by soil microbes.

Maximum Application Rates: The maximum application rates specified in this label are given in units of volume, either fluid ounces, pints or quarts, of this product per acre. The maximum allowed application rates apply to this product combined with the use of any and all other glyphosate- or sulfosate-containing herbicides, either applied separately or in a tank mix, on the basis of total pounds of glyphosate (acid equivalents) per acre. If more than one glyphosate- or sulfosate-containing product is applied to the same site within the same year, ensure that the total of pounds acid equivalent glyphosate does not exceed the maximum allowed.

Do not apply more than 8 quarts of this product (8 lb glyphosate acid) per acre per year for all use sites listed on this label.

IMPORTANT: When using this product, unless otherwise specified, mix with a surfactant, such as a nonionic surfactant containing 80% or greater active ingredient. For conifer release (pine release) use only surfactants that are approved for conifer release and specified on the surfactant label as safe for use in conifer release (pine release). Use of this product without surfactant will result in reduced herbicide performance. Ammonium sulfate, drift control additives, or dyes and colorants may be used. See Mixing Directions and the surfactant manufacturer's label for more information.

Grazing Restrictions: This product may be used to treat undesirable vegetation in utility rights-of-way that pass through pastures, rangeland, and forestry sites that are being grazed. For tank mix applications, comply with all restrictions appearing on the tank mix product label.

Except for lactating dairy animals there are no grazing restrictions following the labeled applications of this product.

For lactating dairy animals there are no grazing restrictions for the following labeled applications of this product:

- Where the spray can be directed onto undesirable woody brush and trees, including in handgun spray to wet or low volume directed spray treatments.
- For tree injection of frill applications and for cut stump treatments.

For broadcast applications, observe the following restrictions for lactating dairy animals:

- For application rates between 4.5 and 7.5 quarts per acre, no more than 15 percent of the available grazing area may be treated.
- For application rates less than 4.5 quarts per acre, no more than 25 percent of the available grazing area may be treated.

These restrictions do not apply to pastures, rangeland or forestry sites outside of utility rights-of-way.

Herbicide Resistance Management

Glyphosate, the active ingredient in this product, is a group 9 herbicide (inhibitor of EPSP synthase). Some naturally occurring weed biotypes that are tolerant (resistant) to glyphosate may exist due to genetic variability in a weed population. Where resistant biotypes exist, the repeated use

of herbicides with the same mode of action can lead to the selection for resistant weeds. Certain agronomic practices reduce the likelihood that resistant weed populations will develop, and can be utilized to manage weed resistance once it occurs.

To delay the selection for glyphosate resistant weeds, use the following practices:

- Scout fields before and after application to detect weed escapes or shifts in weed species.
- Start with a clean field by applying a burndown herbicide or by tillage.
- Control weeds early when they are small.
- Add other herbicides, including a selective and/or a residual herbicide, and cultural practices, including tillage or crop rotation, where appropriate.
- Use the application rate for the most difficult to control weed in the field. Do not tank mix with other herbicides that reduce this product's efficacy through antagonism or with ones that encourage application rates of this product below those specified on this label.
- Control weed escapes and prevent weeds from setting seeds.
- In situations where resistant weeds are a problem, before moving from one site to another, clean equipment to minimize the spread of weed seeds or plant parts.
- Use new commercial seed that is as free of weed seed as possible.
- Report any incidence of repeated non-performance of this product against a particular weed species to the local retailer, county extension agent, or Dow AgroSciences representative.

The following good agronomic practices are recommended to reduce the spread of confirmed glyphosate-resistant biotypes:

- Tank mix this product or apply it sequentially with an appropriately labeled herbicide with a different mode of action to achieve control if a naturally occurring resistant biotype is present in the site.
- Cultural and mechanical control practices, including crop rotation or tillage, may also be used.
- To control weed escapes, including resistant biotypes, before they set seed, scout treated sites after applying this product.
- Thoroughly clean equipment before leaving any site known to contain resistant biotypes.

Because the presence of glyphosate resistance in weed populations is difficult to detect prior to use, Dow AgroSciences accepts no liability for any losses that may result from the failure of this product to control glyphosate-resistant weeds.

Attention

Avoid contact of herbicide with foliage, green stems, exposed non-woody roots or fruit of crops, desirable plants and trees, because severe injury or destruction may result.

AVOID DRIFT. Use extreme care when applying this product to prevent injury to desirable plants and crops.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the crop, plants or other areas on which treatment was not intended. The likelihood of injury occurring from the use of this product increases when winds are gusty, as wind velocity increases, when wind direction is constantly changing, or when there are other meteorological conditions that favor spray drift. When spraying, avoid combinations of pressure and nozzle type that will result in splatter or fine particles (mist) which are likely to drift. **Avoid applying at excessive speed or pressure.**

NOTE: Use of this product in any manner not consistent with this label may result in injury to persons, animals or crops, or other unintended consequences. Keep container closed to prevent spills and contamination.

Spray Drift Management

Avoiding spray drift at the application site is the responsibility of the applicator. 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 drift 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.

- The distance of the outermost nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
- 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 must be observed.

The applicator must be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory.

Aerial Drift Reduction Advisory
This section is advisory in nature and does not supersede the mandatory label requirements.

Importance of 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 adverse effects from 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 product larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. Use the lower spray pressures for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. 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 parallel to the airstream produces larger droplets than other orientations and is the recommended 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 must not be made at a height greater than 10 feet above the top of the largest 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 must increase with increasing drift potential (higher wind, smaller drops, etc.).

Wind: Drift potential is lowest between wind speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Do not apply this product when wind speed is 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: Do not apply this product 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 connected cloud (under low wind conditions) indicates an inversion, while smoke that moves upwards and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas: Apply this pesticide only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Mixing Directions

Use only clean, stainless steel, fiberglass, plastic or plastic-lined steel containers to mix, store and apply spray solutions of this product. Do not mix, store or apply this product or spray solutions of this product in galvanized steel or unlined steel, except stainless steel, containers or spray tanks.

Eliminate any risk of siphoning the contents of the tank mix back into the carrier source while mixing. Use approved anti-back-siphoning devices where required by state or local regulations.

Note: Reduced results may occur if water containing soil is used, including visibly muddy water or water from ponds and ditches that is not clear.

Rodeo – Alone
This product mixes readily with water. Mix spray solutions of this product as follows:

1. Fill the mixing or spray tank with the required amount of clean water.
2. Add the specified amount of this product and nonionic surfactant near the end of the filling process and mix well.
3. During mixing and application, foaming of the spray solution may occur. To prevent or minimize foaming, avoid the use of mechanical agitators, terminate by-pass and return lines at the bottom of the tank and, if needed, use an approved anti-foam or defoaming agent.

Rodeo – Tank Mix
This product does not provide residual weed control. For residual weed control or an alternate mode of action, tank mix this product with other herbicides. It is the pesticide user's responsibility to ensure that all products in the listed mixtures are registered for the intended use. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture..

Under certain conditions, at certain growth stages, and/or under other circumstances, some tank mix products have the potential to cause injury. Read all labels for products used in the tank mix prior to using them to determine the potential for crop injury.

Tank mixing with other herbicides, insecticides, fungicides, micronutrients or foliar fertilizers may result in reduced weed control or injury. Do not use these products in applications with this product unless otherwise noted in this label. To the extent consistent with applicable law, buyer and all users are responsible for all loss or damage in connection with the use or handling of mixtures of this product with herbicides or other materials that are not expressly specified in this labeling. Mixing this product with herbicides or other materials not specified on this label may result in reduced performance.

The user is responsible for ensuring that the specific application being made is included on the label of the product used in the tank mix when a tank mixture with a generic active ingredient, including 2,4-D, atrazine, dicamba, diuron, or pendimethalin, is used.

Read all individual product labels for all products in the tank mix and observe all precautions and restrictions on the label. Use according to the most restrictive directions for each product in the tank mix. Always predetermine the compatibility of all tank mix products, together in the carrier, by mixing small proportional quantities in advance of mixing and applying them to the use site. Add the tank mix product to the tank as directed by the label. Maintain agitation and add the required amount of this product.

Maintain good agitation at all times until the contents in the tank are sprayed. If the mixture is allowed to settle, thorough agitation is required to resuspend the mixture before spraying resumes. Keep the bypass line on or near the bottom of the tank to minimize foaming. The screen size in the nozzle or line strainers must be no finer than 50 mesh.

Note: If tank mixing with Garlon® 3A herbicide, ensure that Garlon 3A is well mixed with at least 75 percent of the total spray volume before adding this product to the spray tank to avoid incompatibility.

Hand-Held Sprayers
Prepare the desired volume of spray solution by mixing the amount of this product in water as shown in the following table:

Spray Concentration (percent)	Amount of this Product for Desired Volume:		
	1 gal	**25 gal**	**100 gal**
0.5	2/3 fl oz	1 pt	2 qt
0.75	1 fl oz	1 1/2 pt	3 qt
1	1 1/3 fl oz	1 qt	1 gal
1.5	2 fl oz	1 1/2 qt	1 1/2 gal
2	2 2/3 fl oz	2 qt	2 gal
3.75	5 fl oz	3 3/4 qt	3 3/4 gal
5	6 1/2 fl oz	1 1/4 gal	5 gal
10	13 fl oz	2 1/2 gal	10 gal

Nonionic Surfactant
When using this product, unless otherwise specified, mix with a surfactant, including a nonionic surfactant containing 80% or more active ingredient. For conifer release (pine release), use only surfactants that are approved for conifer release and specified on the surfactant label as safe for use in conifer release. Using this product without surfactant will result in reduced herbicide performance.

Colorants or Dyes
Agriculturally-approved colorants or marking dyes may be added to this product. Colorants or dyes used in spray solutions of this product may reduce performance, especially at lower rates or dilutions. Use colorants or dyes according to the manufacturer's directions.

Drift Control Additives
Drift control additives may be used with all equipment types except wiper applicators, sponge bars and CDA equipment. When a drift control additive is used, it is the pesticide user's responsibility to ensure that all products in the listed mixtures are registered for the intended use. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture..

Application Equipment and Application Methods

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

Apply spray solutions in properly maintained and calibrated equipment capable of delivering desired volumes.

This product may be applied with the following application equipment and application methods.

Aerial Application
Equipment: Fixed wing and helicopter

Do not apply this product using aerial spray equipment except under conditions as specified within this label.

Avoid drift. Do not apply when winds are gusty or under any other condition which favors drift. Drift may cause damage to any vegetation contacted to which treatment is not intended. To prevent injury to adjacent desirable vegetation, maintain appropriate buffer zones.

Do not directly apply to any body of water.

Use the specified rates of this herbicide in 3 to 25 gallons of water per acre unless otherwise specified on this label. Refer to the specific use directions of this label for volumes and application rates.

Coarse sprays are less likely to drift; therefore, do not use nozzles or nozzle configurations that dispense spray as fine spray droplets. Do not angle nozzles forward into the airstream and do not increase spray volume by increasing nozzle pressure. A drift control additive may be used. When a drift control additive is used, carefully read and observe the precautionary statements and all other information specified on the additive label.

Ensure uniform application. To avoid streaked, uneven or overlapped application, use appropriate marking devices.

Aerial Application Restrictions in California Only

AVOID DRIFT: Do not apply when winds are gusty or under any other condition which favors drift. Drift may cause damage to any vegetation contacted to which treatment is not intended. To prevent injury to adjacent desirable vegetation, appropriate buffer zones must be maintained.

Do not aerially apply this product in a tank mix with dicamba in California.

Make aerial applications with helicopter only. To ensure uniform application, avoid streaking, uneven, or overlapped application, and use appropriate marking devices.

Use the following guidelines when aerial applications are made near crops or desirable perennial vegetation after budbreak and before total leaf drop, and/or near other desirable vegetation or annual crops:

- Do not apply this product using aerial equipment in residential areas.
- Do not apply within 100 feet of all desirable vegetation or crop(s).
- If wind up to 5 miles per hour is blowing toward desirable vegetation or crop(s), do not apply within 500 feet of the desirable vegetation or crop(s).
- Winds blowing from 5 to 10 miles per hour toward desirable vegetation or crop(s) may require buffer zones in excess of the 500-foot minimum buffer.
- Do not apply when winds are in excess of 10 miles per hour or when inversion conditions exist.

Use only coarse sprays to minimize drift. Do not use nozzles or nozzle configurations that dispense spray as fine spray droplets. Do not angle nozzles forward into the airstream and do not increase spray volume by increasing nozzle pressure above the manufacturer's directions.

Thoroughly wash aircraft, especially landing gear, after each day of spraying to remove residues of this product accumulated during spraying or from spills. Prolonged exposure of this product to uncoated steel surfaces may result in corrosion and possible failure of the part. Landing gear is most susceptible. The maintenance of an organic coating (paint) which meets aerospace specification MIL-C-38413 may prevent corrosion.

ADDITIONAL LIMITATIONS FOR AERIAL APPLICATION IN FRESNO COUNTY, CALIFORNIA ONLY

Always read and follow the label directions and precautionary statements for all products used in the aerial application.
The following information applies only from February 15 through March 31 within the following boundaries of Fresno County, California:
North: Fresno County line
South: Fresno County line
East: State Highway 99 West

Observe the following directions to minimize off-site movement during aerial application of this product. Minimization of off-site movement is the responsibility of the grower, Pest Control Advisor and aerial applicator.

Written Directions

Written directions MUST be submitted by or on behalf of the applicator to the Fresno County Agricultural Commissioner 24 hours prior to the application. These written directions MUST state the proximity of surrounding crops and that conditions of each manufacturer's product label and this label have been satisfied.

Aerial Applicator Training and Equipment

Aerial application of this product is limited to pilots who have successfully completed a Fresno County Agricultural Commissioner and California Department of Pesticide Regulation approved training program for aerial application of herbicides. All aircraft must be inspected, critiqued in flight and certified at a Fresno County Agricultural Commissioner approved fly-in. Test and calibrate spray equipment at intervals sufficient to insure that proper rates of herbicides and adjuvants are being applied during commercial use. Applicator must document such calibrations and testing. Demonstration of performance at Fresno County Agricultural Commissioner approved fly-ins constitutes such documentation, or other written records showing calculations and measurements of flight and spray parameters acceptable to the Fresno County Agricultural Commissioner.

Applications at Night – Do not apply this product by air earlier than 30 minutes prior to sunrise and/or later than 30 minutes after sunset without prior permission from the Fresno County Agricultural Commissioner.

To report known or suspected misuse of this product, call 1-800-332-3111.

For additional information on the proper aerial application of this product in Fresno County, call 916-784-1718.

Aquatic and Noncrop Sites

When this product is applied under the conditions described, it controls or partially controls the labeled weeds growing in the following industrial, recreational, and public areas or other similar sites.

Aquatic sites includes all bodies of fresh and brackish water that may be flowing, nonflowing, or transient-including lakes, rivers, streams, ponds, seeps, irrigation and drainage ditches, canals, reservoirs, estuaries and similar sites.

If aquatic sites are present in the noncrop area and are part of the intended treatment, read and observe the following directions:

- This product does not control plants that are completely submerged or have a majority of their foliage under water.
- There is no restriction on the use of treated water for irrigation, recreation, or domestic purposes.
- Consult local and state fish and game agency and water control authorities before applying this product to public water. Permits may be required to treat such water.
- To make aquatic applications around and within 1/2 mile of active potable water intakes, the water intake must be turned off for a minimum period of 48 hours after the application. The water intake may be turned on prior to 48 hours if the glyphosate level in the intake water is below 0.7 parts per million as determined by laboratory analysis. These aquatic applications may be made only in those cases where there are alternative water sources or holding ponds that would permit the turning off of an active potable water intake for a minimum period of 48 hours after the application.

Restrictions:

- Do not apply this product within 1/2 mile upstream of an active potable water intake in flowing water (i.e., river stream, etc.), or within 1/2 mile of an active potable water intake in a standing body of water, such as a lake, pond, or reservoir.

Ground Application

Equipment: Boom or boomless systems, pull-type sprayer, floaters, pick-up sprayers, spray coupes and other ground broadcast equipment.

Use the specified rates of this product in 3 to 40 gallons of water per acre as a broadcast spray unless otherwise specified on this label. As density of weeds increases, increase the spray volume within the rate range to ensure complete coverage. Carefully select proper nozzles to avoid spraying a fine mist. For best results with ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

Hand-Held and High-Volume Including Backpack Application

Equipment: Knapsack and backpack sprayers, pump up pressure sprayers, handguns, hand wands, mistblowers, lances, and other hand-held and motorized spray equipment used to direct the spray onto weed foliage. **Note:** This product is not registered in Arizona or California for use in mistblowers.

Apply to foliage of vegetation to be controlled. Do not spray to the point of runoff for applications made on a spray to wet basis. Use coarse sprays only. For best results, cover the top half of the plant and at least half of the total foliage. To ensure adequate spray coverage, spray both sides of large or tall woody brush and trees, when foliage is thick and dense, or where there are multiple sprouts.

High Volume Sprays: Prepare a 3/4 to 2 percent solution of this product in water, add a nonionic surfactant and apply to foliage of vegetation to be controlled. For specific rates of application and instructions for control of various annual and perennial weeds, see the Weeds Controlled section.

Make applications on a spray to wet basis with uniform and complete spray coverage. Do not spray to point of runoff.

Low Volume Directed Sprays: This product may be used as a 5 to 10 percent solution in low volume directed sprays for spot treatment of trees and brush. This treatment method is most effective in areas where there is a low density of undesirable trees or brush. If a straight stream nozzle is used, start the application at the top of the targeted vegetation and spray from top to bottom in a lateral zigzag motion. Ensure that at least 50 percent of the leaves are contacted by the spray solution. For flat fan and cone nozzles and with hand-directed mist blowers, mist the application over the foliage of the targeted vegetation. Treat small, open-branched trees only from one side. If the foliage is thick or there are multiple root sprouts, apply from several sides to ensure adequate spray coverage. Prepare the desired volume of spray solution by mixing the amount of this product in water as shown in the following table.

Spray Solution:

Desired Volume	Amount of This Product								
	0.5	0.75	1	1.25	1.5	2	5	8	10
1 gal	2/3 fl oz	1 fl oz	1 1/3 fl oz	1 2/3 fl oz	2 fl oz	2 2/3 fl oz	6 1/2 fl oz	10 1/4 fl oz	13 fl oz
25 gal	1 pt	1 1/2 pt	1 qt	1 1/4 qt	1 1/2 qt	2 qt	1 1/4 gal	2 gal	2 1/2 gal
100 gal	2 qt	3 qt	1 gal	1 1/4 gal	1 1/2 gal	2 gal	5 gal	8 gal	10 gal

2 Tablespoons = 1 fl oz

For best results when using knapsack sprayers, mix the specified amount of product with water in a larger container. Fill the knapsack sprayer with the solution and add the correct amount of surfactant.

Selective Equipment

Equipment: Recirculating sprayers, shielded and hooded sprayers, wiper applicators and sponge bars.

Do not contact desirable vegetation with herbicide. Droplets, mist, foam, or splatter of the herbicide settling on desirable vegetation is likely to result in discoloration, stunting or destruction.

Better results are obtained when more of the weed is exposed to the herbicide solution. Weeds not contacted by the herbicide solution will not be affected. This may occur in dense clumps, severe infestations, or when the height of weeds varies so that not all weeds are contacted. If this occurs, repeat treatment up to the labled rate may be necessary.

Shielded and Hooded Applicators: A shielded or hooded applicator directs the herbicide solution onto weeds while shielding desirable vegetation from the herbicide. Use nozzles that provide uniform coverage within the treated area. Keep shields on these sprayers adjusted to protect desirable vegetation. **Exercise extreme care to avoid contact of the herbicide with desirable vegetation.**

Wiper Applicators: Wiper applicators are devices that physically wipe appropriate amounts of this product directly onto the weed. Equipment must be designed, maintained and operated to prevent the herbicide solution from contacting desirable vegetation.

Adjust wiper applicators used over the top of desirable vegetation so that the wiper contact point is at least 2 inches above the desirable vegetation. Better results are obtained when more of the weed is exposed to the herbicide solution. Weeds should be a minimum of 6 inches above the desirable vegetation. Adjust the applicator height to ensure adequate contact with weeds as weeds not contacted by the herbicide solution will not be affected. Poor contact may occur when weeds are growing in dense clumps, in severe weed infestations, or when weed height varies dramatically. If this occurs, repeat treatment up to the labeled rate may be necessary.

Operate this equipment at ground speeds no more than 5 mph. Performance may be improved by reducing speed in areas of heavy weed infestations to ensure adequate wiper saturation. Better results may be obtained if two applications are made in opposite directions.

Droplets, mist, foam, or splatter of the herbicide settling onto desirable vegetation may result in discoloration, stunting or destruction. Avoid leakage or dripping onto desirable vegetation. Adjust height of applicator to ensure adequate contact with weeds. Keep wiping surfaces clean. Be aware that on sloping ground the herbicide solution may migrate, causing dripping on the lower end and drying of the wicks on the upper end of a wiper applicator.

Do not use wiper equipment when weeds are wet.

Mix only the amount of solution to be used during a one-day period as reduced activity may result from use of leftover solutions. Clean wiper parts by thoroughly flushing with water immediately after using this product.

For best results, use a nonionic surfactant at a rate of 10 percent by volume of total herbicide solution for all wiper applications.
Rope or Sponge Wick Applicators: Use solutions of 33 to 75 percent of this product in water.
Panel Applicator: Use solutions of 33 to 100 percent of this product in water.

Injection Systems
Equipment: Aerial or ground injection sprayers.

This product may be used in aerial or ground injection spray systems. It may be used as a liquid concentrate or diluted prior to injecting into the spray stream. Do not mix this product with the concentrate of other products when using injection systems.

Controlled Droplet Applicator (CDA)
Equipment: Hand-held or boom-mounted applicators that produce a spray consisting of a narrow range of droplet sizes.

The rate of this product applied per acre by vehicle-mounted CDA equipment must not be less than the amount specified on this label when applied by conventional broadcast equipment. For vehicle-mounted CDA equipment, apply 3 to 15 gallons of water per acre.

For the control of annual weeds with hand-held CDA units, apply a 20 percent solution of this product at a flow rate of 2 fl oz per minute and a walking speed of 1.5 mph (1 1/2 pints of product per acre). For control of perennial weeds, apply a 20 to 40 percent solution of this product at a flow rate of 2 fl oz per minute and a walking speed of 0.75 mph (3 to 6 pints of product per acre).

CDA equipment produces a spray pattern that is not easily visible. Exercise extreme care to avoid spray or drift contacting the foliage or any other green tissue of desirable vegetation as damage or destruction may result.

Use Sites

Use this product in noncrop areas, including airports, apartment complexes, aquatic sites, Christmas tree farms, commercial sites, Conservation Reserve Program (CRP) areas, ditch banks, driveways, dry ditches, dry canals, fencerows, golf courses, greenhouses, habitat management, industrial areas, lumber yards, manufacturing sites, municipal sites, natural areas, office complexes, ornamentals, parking areas, parks, pastures, petroleum tank farms and pumping installations, plant nurseries, public areas, railroads, rangeland, recreation areas, utility rights-of-way, roadsides, shadehouses, sod or turf seed farms, sports complexes, storage areas, substations, turfgrass areas, utility sites, warehouse areas, wildlife habitat management areas, and in grazed areas on these sites.

Aquatic Sites

This product may be applied to emerged weeds in all bodies of fresh and brackish water that may be flowing, nonflowing or transient including lakes, rivers, streams, ponds, estuaries, rice levees, seeps, irrigation and drainage ditches, canals, reservoirs, wastewater treatment facilities, wildlife habitat restoration and management areas and similar sites.

If aquatic sites are present in the noncrop area and are part of the intended treatment, read and observe the following directions:

- This product does not control plants that are completely submerged or have a majority of their foliage under water.
- There is no restriction on the use of treated water for irrigation, recreation or domestic purposes.
- Consult local and state fish and game agency and water control authorities before applying this product to public water. Permits may be required to treat such water.
- To make aquatic applications around and within 1/2 mile of active potable water intakes, the water intake must be turned off for a minimum period of 48 hours after the application. The water intake may be turned on prior to 48 hours if the glyphosate level in the intake water is below 0.7 parts per million as determined by laboratory analysis. These aquatic applications may be made **only** in those cases where there are alternative water sources or holding ponds which would permit the turning off of an active potable water intake for a minimum period of 48 hours after the application.
- For treatments after draw down of water or in dry ditches, allow 7 days or more after treatment before reintroduction of water to achieve maximum weed control. Apply this product within 1 day after draw down to ensure application to actively growing weeds.
- Floating mats of vegetation may require retreatment up to the labeled rate. Avoid wash off of sprayed foliage by spray boat or recreational boat backwash or by rainfall within 6 hours of application. Do not re-treat within 24 hours following the initial treatment.
- Applications made to moving bodies of water must be made while traveling upstream to prevent concentration of this herbicide in water. When making any bankside applications, do not overlap more than 1 foot into open water. Do not spray in bodies of water where weeds do not exist. The maximum application rate of 7 1/2 pints per acre must not be exceeded in any single broadcast application that is being made over water.
- When emerged infestations require treatment of the total surface area of impounded water, treating the area in strips may avoid oxygen depletion due to decaying vegetation. Oxygen depletion may result in fish kill.

Restrictions:
- Do not apply this product directly to water within 1/2 mile upstream of an active potable water intake in flowing water (i.e., river, stream, etc.), or within 1/2 mile of an active potable water intake in a standing body of water, such as a lake, pond or reservoir. This restriction does not apply to intermittent inadvertent overspray of water in terrestrial use sites.

Wetland Sites

This product may be applied to undesirable vegetation in and around water (aquatic areas) and wetlands found in forestry, utility rights-of-way sites or other site listed on the label, including where these sites are adjacent to or surrounding domestic water supply reservoirs, supply streams, lakes and ponds.

If wetland sites are present, read and observe the following directions:

- There is no restriction on the use of treated water for irrigation, recreation or domestic purposes.
- Consult local public water control authorities before applying this product in and around public water. Permits may be required to treat in such areas.

Restrictions:
- Do not apply this product directly to water within 1/2 mile upstream of an active potable water intake in flowing water (i.e., river, stream, etc.), or within 1/2 mile of an active potable water intake in a standing body of water, such as a lake, pond or reservoir. This restriction does not apply to intermittent inadvertent overspray of water in terrestrial use sites.
- Do not spray open bodies of water where woody brush, trees and herbaceous weeds do not exist. Do not apply more than 3 3/4 quarts per acre in a single over water broadcast application except in stream crossings in utility right-of-way or where applications will result in less than 20 percent of the total water area being treated. In either of these locations, any specified rate may be applied:

Christmas Tree Plantations

Broadcast Application (Oregon and Washington Only)
Broadcast apply this product over the established Christmas tree species Douglas fir (*Pseudotsuga menziesii*), fir species (*Abies* spp.), and pine species (*Pinus* spp.) (except eastern white, loblolly, longleaf, shortleaf, slash), and spruce species (*Picea* spp.). Use 1 quart of this product per acre in 5 to 30 gallons of water per acre. For best results, add up to 10 fl oz of Entry II surfactant per acre. If using a different surfactant, follow the manufacturer's directions for use and ensure conifer safety has been adequately tested for that surfactant. Apply after trees have completed at least a full growing season since planting or transplanting.

Apply only in the fall after the formation of the final conifer resting buds or in the spring prior to initial bud swell. Final resting buds must be fully hardened and in the dormant stage. Applying this product at any other time may result in unacceptable injury to the Christmas trees. Avoid spray pattern overlap as injury may occur.

In some areas, 1 to 2 quarts of this product per acre may be used. Consult your local representative for specific use instructions if rates greater than 1 quart per acre are required.

For best results, do not use drift control additives as they may increase injury to Christmas trees.

Precautions:
- Ensure that adequate buffers are maintained to prevent drift onto nearby desirable crops or vegetation.

Restrictions:
- **Preharvest Interval:** Do not apply within 1 full year prior to tree harvest.

Cut Stump

Treat cut stumps in any noncrop site listed on this label. This product will control regrowth of freshly cut stumps and resprouts of many types of woody brush and tree species, some of which are listed below. Apply this product using suitable equipment to ensure coverage of the entire cambium. Cut trees or resprouts close to the soil surface. Apply a 50 to 100 percent solution of this product to freshly cut surface immediately after cutting. Delays in application may result in reduced performance. For best results, make applications during periods of active growth and full leaf expansion.

When used according to directions for cut stump application, this product will control, partially control or suppress most woody brush and tree species, some of which are listed below:

Common Name	Scientific Name
alder	*Alnus* spp.
coyotebrush[1]	*Baccharis pilularis*
dogwood[1]	*Cornus* spp.
eucalyptus	*Eucalyptus* spp.
hickory[1]	*Carya* spp.
madrone, Pacific	*Arbutus menziesii*
maple[1]	*Acer* spp.
oak	*Quercus* spp.
peppertree, Brazilian	*Schinus terebinthifolius*
Australian-pine,	*Casuarina equisetifolia*
poplar[1]	*Populus* spp.
reed, giant	*Arundo donax*
saltcedar	*Tamarix ramosissima*
sweetgum[1]	*Liquidambar styraciflua*
sycamore[1]	*Platanus occidentalis*
tan oak	*Lithocarpus densiflorus*
willow	*Salix* spp.

[1]Do not use this product on these species in the state of California.

Precautions:
- Adjacent trees that are of a similar age, height and spacing may indicate shared roots.
- Injury is likely to occur to non-treated stems or trees when one tree or more that shares a common root is treated.

Restrictions:
- Do not make cut stump applications when the roots of desirable woody brush or trees may be grafted to the roots of the cut stump. Some sprouts, stems, or trees may share the same root system.

Injection and Frill (Woody Brush and Trees)

Woody vegetation may be controlled by injection or frill application of this product. Apply this product using suitable equipment that penetrates into the living tissue. Apply the equivalent of 1 mL of this product per each two to three inches of trunk diameter at breast height (DBH). This is best achieved by applying 50 to 100 percent concentration of this product either to a continuous frill around the tree or as cuts evenly spaced around the tree below all branches. As tree diameter increases in size, better results are achieved by applying diluted material to a continuous frill or more closely spaced cuttings. Do not make any applications that allow runoff to occur from frilled or cut areas in species that exude sap freely. In species such as this, make frill or cuts at an oblique angle to produce a cupping effect and use a 100 percent undiluted concentration of this product. For best results, apply during periods of active growth and full leaf expansion.

This product controls the following woody species:

Common Name	Scientific Name
oak	*Quercus* spp.
poplar	*Populus spp.*
sweetgum	*Liquidambar styraciflua*
sycamore	*Platanus occidentalis*

This product suppresses the following woody species:

Common Name	Scientific Name
blackgum[1]	*Nyssa sylvatica*
dogwood	*Cornus* spp.
hickory	*Carya* spp.
maple, red	*Acer rubrum*

[1]Do not use this product on these species in the state of California.

Forestry Site Preparation

This product is for the control or partial control of woody brush, trees, and herbaceous weeds in forestry. This product is also for use in preparing or establishing wildlife openings within these sites and maintaining logging roads.

In forestry sites, use this product in site preparation prior to planting any tree species including Christmas trees, eucalyptus, hybrid tree cultivars and silvicultural nursery sites. Unless otherwise specified, make applications of this product for control or partial control of herbaceous weeds, woody brush and trees listed in the Weeds Controlled section.

Application Rates

Method of Application	Rate	Spray Volume (gal/acre)
Broadcast		
aerial	1.5 - 7.5 qt/acre	5 - 30
ground		10 - 60
Spray to Wet		
handgun, backpack	0.75 - 2%	spray to wet
mistblower	by volume	
Low Volume Directed Spray[1]		
handgun, backpack	5 - 10%	partial coverage
mistblower	by volume	

[1] For low volume directed spray applications, coverage should be uniform with at least 50% of the foliage contacted. For best results, coverage of the top one-half of the plant, including the growing tip, is important (over the top and down coverage) To ensure adequate spray coverage, spray all sides of large or tall woody brush and trees, when foliage is thick and dense, or where there are multiple sense or tall sprouts.

Use a higher rate in the rate range for control or partial control of woody brush, trees and hard to control perennial herbaceous weeds. For best results, apply to actively growing woody brush and trees after full leaf expansion and before leaf drop. Use increased rates within the rate range to control perennial herbaceous weeds from emergence up to the appearance of seedheads, flowers or berries. Use a lower rate in the rate range to control annual herbaceous weeds and actively growing perennial herbaceous weeds after seedheads, flowers or berries appear. Apply to foliage of actively growing annual herbaceous weeds anytime after emergence.

This product has no herbicidal or residual activity in the soil. Where repeat applications up to the labled rate are necessary, do not apply more than 8 quarts of product per acre per year.

Tank Mixes

This product may be used in tank mix combination with other herbicide products to broaden the spectrum of vegetation controlled. When tank mixing, read and observe applicable use directions, precautions and limitations on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture. Any specified rate of this product may be used in a tank mix.

Note: For forestry site preparation, make sure the tank mix product is approved for use prior to planting the desired species. Observe planting interval restrictions.

Any specified rate of this product may be used in a tank mix with the following products for forestry site preparation:

Product
Milestone VM
Garlon 3A
Garlon 4
Arsenal Applicators Concentrate
Escort
Chopper
Oust XP
Arsenal Applicators Concentrate
Arsenal Applicators Concentrate

For control of herbaceous weeds, use the lower specified tank mixture rates. For control of dense stands or difficult to control woody brush and trees, use the higher specified rates.

Aerial Application
Aerially apply this product by helicopter only in forestry sites. See Aerial Application in Application Equipment and Application Methods for more details.

Ground Application
Apply this product using suitable ground equipment for broadcast applications in forestry sites. See Ground Application in Application Equipment and Application Methods for more details. Unless otherwise specified, apply the specified rates of this product as a broadcast spray in sufficient spray volume to provide complete and uniform coverage of plant foliage. Check for even distribution throughout the spray pattern.

Hand-Held and Backpack Application
Apply this product using handgun and backpack equipment in forestry sites. See Hand-Held and Backpack Application in Application Equipment and Application Methods for more details. For spray to wet applications, coverage should be uniform and complete, but not to the point of runoff.

This product may be used for low volume directed sprays for spot treatment of trees and brush. It is most effective in areas where there is a low density of undesirable trees or brush. For flat fan and cone nozzles, spray the foliage of the targeted vegetation. Small, open branched trees need only be treated from one side. If the foliage is thick or there are multiple root sprouts, apply from several sides to ensure adequate spray coverage.

Forestry Conifer and Hardwood Release

Directed Sprays and Selective Equipment
Apply this product as a directed spray or with selective equipment in forestry conifer and hardwood sites, including Christmas tree plantations and silvicultural nurseries. A surfactant must be used with this product. Use only surfactants approved for conifer release and specified on the surfactant label as safe for use in conifer release (pine release). Using this product without a surfactant will result in reduced herbicide performance. See Mixing Directions and Application Equipment and Application Methods sections.

Avoid contact of spray drift, mist or drips with foliage, green bark or non-woody surface roots of desirable plant species.

Tank Mixes: When tank mixing, read and observe applicable use directions, precautions and limitations on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture.

Broadcast Application Outside Area of Southeastern United States
Apply this product as a broadcast application for release of Douglas fir (*Pseudotsuga menziesii*), fir (*Abies* species), hemlock (*Tsuga* species), pines (*Pinus* species) (includes all species except loblolly, longleaf, shortleaf, or slash), and California redwood (*Sequoia* species) outside the area of the southeastern United States. Apply this product as a broadcast application only after formation of final conifer resting buds in the fall or prior to initial bud swelling in the spring. Note: Except where specified, make broadcast applications of this product only where conifers have been established for more than one year.

Injury may occur to conifers treated for release, especially where spray patterns overlap or the higher labeled rate is applied. Damage can be accentuated if applications are made when conifers are actively growing, are under stress from drought, flood water, improper planting, insects, animal damage or diseases.

Apply 3/4 to 1 1/2 quarts per acre as a broadcast spray. Apply 3/4 to 1 1/8 quarts of this product per acre to release Douglas fir, pine and spruce species at the end of the first growing season (except California). Ensure all conifers are well hardened off.

A surfactant must be used with this product for optimum weed control. Use only surfactants approved for use in over the top release applications. Using this product without a surfactant will result in reduced herbicide performance. For best results, do not use a surfactant for release of hemlock species or California redwood. In mixed conifer stands, injury to these species may result if a surfactant is used. See Mixing Directions and Application Equipment and Application Methods sections.

For release of Douglas fir, a nonionic surfactant for over the top foliar spray may be used. To avoid possible conifer injury, use nonionic surfactants at 2 fl oz per acre at elevations above 1500 feet, or 1 fl oz per acre in the coastal range or at elevations below 1500 feet. Using a higher rate of surfactant may result in unacceptable conifer injury. Ensure the nonionic surfactant has been adequately tested for safety to Douglas fir before using.

Tank Mixes with Oust XP: Apply 3/4 to 1 1/2 quarts of this product with the labeled rate of Oust XP per acre to release jack pine and white. Use the labeled rate of Oust XP per acre with this product to release white pine. Make applications to actively growing weeds as a broadcast spray over the top of established conifers. Make applications after formation of conifer resting buds in the late summer or fall.

Tank Mixes with Arsenal Applicators Concentrate: Apply 3/4 to 1 1/8 quarts of this product with the labeled rate of Arsenal Applicators Concentrate per acre to release Douglas fir. Apply 1 1/2 quarts of this product with the labeled rate of Arsenal Applicators Concentrate per acre to release balsam fir and red spruce.

In **Maine** and **New Hampshire**, apply up to 2 1/4 quarts of this product per acre to control or suppress difficult to control hardwood species. For the release of red pine, balsam fir, red spruce, white spruce, Norway spruce, and black spruce with dense tough to control brush, and where maples make up a large component of the undesirable trees, this product may be tank mixed with the labeled rate of Arsenal Applicators Concentrate and the labeled rate of Oust XP per acre. Apply this mix as a broadcast spray.

Broadcast Application in Southeastern United States
Apply this product as a broadcast application for release of loblolly pine (*Pinus taeda*), eastern white pine (*Pinus strobus*), shortleaf pine (*Pinus echinata*), slash pine (*Pinus elliottii*), Virginia pine (*Pinus virginiana*), and longleaf pine (*Pinus palustris*) in the southeastern United States.

Apply 1 1/8 to 1 7/8 quarts of this product per acre as a broadcast spray during late summer or early fall after the conifers have hardened off. For applications at the end of the first growing season, use 3/4 quart of this product alone or in a tank mix.

Tank Mixes with Arsenal Applicators Concentrate: For conifer release, apply 3/4 to 1 1/2 quarts of this product with the labeled rate of Arsenal Applicators Concentrate per acre as a broadcast spray. Use only on conifer species that are labeled for over the top spray for both products. Use the higher specified rates for dense tough to control wood brush and trees.

Herbaceous Release
When applied as directed, this product plus listed residual herbicides provide postemergence control of the annual weeds and control or suppression of the perennial weeds listed in this label, and residual control of the weeds listed in the residual herbicide label. Make applications to actively growing weeds as a broadcast spray over the top of labeled conifers.

Use a surfactant labeled for use in over the top herbaceous release applications. Using this product without a surfactant will result in reduced herbicide performance. See Mixing Directions and Application Equipment and Application Methods sections on this label.

Weed control may be reduced if spray solution water volumes exceed 25 gallons per acre for these treatments.

Tank Mixes with Oust XP: Apply 12 to 18 fl oz of this product with the labeled rate of Oust XP per acre to release loblolly pines. Apply 9 to 12 fl oz of this product with the labled rate of Oust XP per acre to release slash pines.

Tank Mix with Atrazine: Apply 3/4 quarts of this product with 4 lb ai of atrazine per acre to release Douglas fir. Apply only over Douglas fir that has been established for at least one full growing season. Apply in the early spring, usually mid-March through early April. Injury will occur if applications are made after bud swell in the spring. For this use, do not add surfactant to the tank mix.

In **Maine** and **New Hampshire**, for release of red pine, balsam fir, red spruce, white spruce, Norway spruce, and black spruce with heavy grass and herbaceous weeds infesting the site, up to 2 1/4 quarts of this product per acre may be tank mixed with the labled rate of Oust XP to control grass, herbaceous weeds and woody brush. Apply this mix as a broadcast spray.

Mid-Rotation Conifer Release and Spot Treatments for Crop Tree Release and Timber Stand Improvement

This product is applied as a ground broadcast or directed spray application for mid-rotation release applications under the canopy of pines (and other conifers) and hardwoods. Make applications using application techniques that prevent or minimize direct contact to the foliage of crop trees (including in stands of pine, other conifers, or hardwood). This may be accomplished using directed sprays and ground equipment with nozzles oriented to target only undesirable understory vegetation below the crop tree canopy. This product is applied as a spot, individual plant treatment for woody and herbaceous weeds (see Hand-Held and Backpack Application in Application Equipment and Application Methods section). When making spot applications, do not allow spray to contact the foliage of desirable crop trees.

Broadcast Application for Control of Undesirable Competitive Vegetation in Larch (*Larix* spp.) Plantations in Maine

Apply this product to control or reduce competition from undesirable vegetation in Larch (*Larix* spp.) plantations in the state of Maine.

Application Timing
Apply only after lignification has occurred in 50% or more of the current year's terminal growth.

Application Directions
Broadcast Spray: Use 1 to 3 quarts of this product per acre. Apply in a total spray volume of 10 to 60 gallons per acre using ground equipment or 5 to 15 gallons per acre if applied aerially. Up to 30 fl oz of Entry II surfactant may be added.

Directed Sprays: This product may be applied as a directed spray for competitive release of larch. Avoid contact of spray drift, mist or drips with foliage, green bark or non-woody surface roots of desirable plants. See Application Equipment and Application Methods of the product label.

Injury to larch may occur, especially where spray patterns overlap or higher labeled rates of this product or surfactant were applied. Damage can be accentuated if application is made when larch is actively growing or is under stress. Make applications only if some level of injury to larch is acceptable.

Noncrop Areas and Industrial Sites

See the rate tables in the Annual Weeds, Perennial Weeds, and Woody Brush and Trees sections for specific application rates. This product has no herbicidal or residual activity in the soil. Where repeat applications up to the labeled rate are necessary, do not apply more than 8 quarts of this product per acre per year.

Use a higher rate in the rate range for control or partial control of woody brush, trees, and hard to control perennial herbaceous weeds. For best results, apply to actively growing woody brush and trees after full leaf expansion and before fall color and leaf drop. Use increased rates within the rate range for difficult to control species, where dense stands occur, or where conditions for control are not ideal and to control perennial herbaceous weeds from emergence up to the appearance of seedheads, flowers or berries. Use a lower rate in the rate range to control annual herbaceous weeds and actively growing perennial herbaceous weeds after seedheads, flowers or berries appear. Apply to foliage of actively growing annual herbaceous weeds anytime after emergence.

Tank Mixing for Noncrop Areas
This product may be used in tank mix combination with other herbicide products to broaden the spectrum of vegetation controlled. When tank mixing, read and observe applicable use directions, precautions and limitations on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture. Any specified rate of this product may be used in a tank mix.

Maintain good agitation at all times during the mixing process and application. Ensure that the tank mix product(s) is well mixed with the spray solution before adding this product. Mix only the amount of spray solution that will be used during the same day. Reduced weed control may result if a tank mixture is allowed to stand overnight. If the spray mix is allowed to settle, thorough agitation is required to resuspend the mixture before spraying is resumed.

Weed Control, Trim and Edge, and Bare Ground
This product may be used in general noncrop and non-food areas. It may be applied with any application equipment described in this label. This product may be used to trim and edge around objects in noncrop sites, for spot treatment of unwanted vegetation, and to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects.

To maintain bare ground, repeated applications up to the labeled rate of this product may be used.

This product provides control of emerged annual weeds and control or partial control of emerged perennial weeds, woody brush and trees when applied in a tank mix to bare ground.

Turfgrass Renovation, Seed or Sod Production

This product controls most existing vegetation prior to renovating turfgrass areas or establishing turfgrass grown for seed or sod. For maximum control of existing vegetation, delay planting or sodding to determine if any regrowth from escaped underground plant parts occurs. When repeat treatments are necessary, sufficient regrowth must be attained prior to application. For warm season turfgrass, including bermudagrass, summer or fall applications provide the best control. Where existing vegetation is growing under mowed turfgrass management, apply this product after omitting at last one regular mowing to allow sufficient grown for good interception of the spray.

Do not disturb soil or underground plant parts before treatment. Delay tillage or renovation techniques, including vertical mowing, coring, or slicing, for seven days after application to allow translocation into underground plant parts.

Desirable turfgrass may be planed following the above procedures.

Hand-held equipment may be used for spot treatment of unwanted vegetation growing in existing turfgrass. Broadcast or hand-held equipment may be used to control sod remnants or other unwanted vegetation after sod is harvested.

Do not feed or graze turfgrass grown for seed or sod production for eight weeks following application.

Ornamentals and Plant Nurseries

Post-Direct and Trim and Edge
This product may be used as a post-directed spray around established woody ornamental species, including arborvitae, azalea, boxwood, crabapple, euonymus, fir, Douglas fir, jojoba, hollies, lilac, magnolia, maple, oak, provet, pine, spruce and yew. This product may also be used to trim and edge around trees, buildings, sidewalks and roads, potted plants and other objects in a nursery setting.

Desirable plants may be protected from the spray solution by using shields or coverings made of cardboard or other impermeable material. Do not use this product for any over the top broadcast spray in ornamentals. Exercise care to avoid contact of spray, drift or mist with foliage or green bark of established ornamental species.

Site Preparation
This product may be used prior to planting any ornamental, nursery or Christmas tree species.

Greenhouse/Shadehouse
This product may be used to control weeds growing in and around greenhouses and shadehouses. Desirable vegetation must not be present during application and air circulation fans must be turned off.

Wildlife Habitat Management

This product may be used to control exotic and other undesirable vegetation in habitat management and natural areas, including rangeland and wildlife refuges. Apply to allow recovery of native plant species, prior to planting desirable native species, and for broad spectrum vegetation control. Apply spot treatments to selectively remove unwanted plants for habitat enhancement.

Wildlife Food Plots
This product may be used as a site preparation treatment to control annual and perennial weeds prior to planting wildlife food plots. Any wildlife food species may be planted after applying this product, or native species may be allowed to repopulate the area. If tillage is needed to prepare a seedbed, wait 7 days after application before tilling to allow translocation into underground plant parts.

Hollow Stem Injection

Apply this product to control giant knotweed (*Polygonum sachalinense*), Japanese knotweed (*Polygonum cuspidatum*), or other invasive knotweeds using individual stem treatment. Use a hand-held injection device that delivers the specified amount of this product into these hollow stem plants.

Make a hole through both sides of the stem about 6 inches above the ground, just below a node, using an awl or other pointed tool. Inject 5 mL of undiluted product directly into this hole in the hollow stem. Treat each stem of the knotweed plant.

Restrictions:
- Do not apply more than a total of 8 quarts of this product per acre for all treatments combined. At 5 mL per stem, 7.5 quarts will treat approximately 1420 stems per acre.

Parks, Recreational and Residential Areas

Use this product in parks, recreational and residential areas. Apply it with any application equipment described in this label. Use this product to trim and edge around trees, fences, paths, around buildings, sidewalks, and other objects in these areas. This product may be used for spot treatment of unwanted vegetation, eliminate unwanted weeds growing in established shrub beds or ornamental plantings, and prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects.

All of the label instructions apply to park and recreational areas.

Railroads

All of the instructions in the Noncrop Areas and Industrial Sites and Roadside sections apply to railroads.

Bare Ground, Ballast and Shoulders, Crossings, and Spot Treatment
Use this product to maintain bare ground on railroad ballast and shoulders. Repeat applications up to the labled rate of this product may be used as weeds emerge to maintain bare ground. Use this product to control tall growing weeds to improve line of sight at railroad crossings and reduce the need for mowing along rights-of-way.

Brush Control
Apply 3 to 8 quarts of this product per acre as a broadcast spray, using boom-type or boomless nozzles. Applications up to 80 gallons of spray solution per acre may be used. Apply a 3/4 to 1.5 percent solution of this product when using high volume spray to wet applications. Apply a 5 to 10 percent solution of this product when using low volume directed sprays for spot treatment.

Roadsides

All of the instructions in the Noncrop Areas and Industrial Sites and Railroads sections apply to roadsides.

Shoulder Treatments
Use this product on road shoulders. Apply it with boom sprayers, shielded boom sprayers, high volume off-center nozzles, OC nozzle clusters, manifold nozzle systems, hand-held equipment, and similar equipment, and under-deck mowing plus herbicide systems.

Guardrails and Other Obstacles to Mowing
Use this product to control weeds growing under guardrails and around signposts and other objects along the roadside.

Spot Treatment
Use this product as a spot treatment to control unwanted vegetation growing along roadsides.

Tank Mixes: This product may be used in tank mix combination with other herbicide products to broaden the spectrum of vegetation controlled and for residual weed control. Follow applicable use directions, precautions and limitations on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture. Any specified rate of this product may be used in a tank mix.

Chemical Mowing
Perennials: This product suppresses perennial grasses listed in this section to serve as a substitute for mowing. Use 4.5 fl oz of this product per acre when treating Kentucky bluegrass, tall fescue, fine fescue, orchardgrass, or quackgrass. Apply 12 fl oz of this product per acre when treating bermudagrass. Apply 4.5 to 8 fl oz of this product per acre when treating bahiagrass. Use the higher labled rates when grass is under heat stress. Apply 3 pints of this product per acre when treating torpedograss or paragrass. Apply treatments in 10 to 20 gallons of spray solution per acre.

Annuals: For growth suppression of some annual grasses, including annual ryegrass, wild barley and wild oats growing in coarse turfgrass on roadsides or other industrial areas, apply 3 to 3.75 fl oz of this product in 10 to 40 gallons of spray solution per acre. Apply when annual grasses are actively growing and before the seedheads are in the boot stage of development. Treatments may cause injury to the desired grasses.

Release of Dormant Bermudagrass or Bahiagrass
Apply 6 to 48 fl oz of this product per acre in 10 to 40 gallons of water per acre. Use only in areas where bermudagrass or bahiagrass are desirable groundcovers and where some temporary injury or discoloration can be tolerated. Treatments of more than 12 fl oz per acre may result in injury or delayed greenup in highly maintained areas, including golf courses and lawns.

For best results on winter annuals, treat when weeds are in an early growth stage (less than 6 inches in height) after most have germinated. For best results on tall fescue, treat when fescue is in or beyond the 4- to 6-leaf stage.

Tank Mixes: This product may be used in tank mix combination with other herbicide products to broaden the spectrum of vegetation controlled and for residual weed control. When tank mixing, read and follow all applicable use directions, precautions, and limitation on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture. Any specified rate of this product may be used in a tank mix.

Actively Growing Bermudagrass
Use this product to control or partially control many annual and perennial weeds for effective release of actively growing bermudagrass. Use only in areas where some temporary injury or discoloration can be tolerated. Use only on well-established bermudagrass. Bermudagrass injury may result from the treatment, but regrowth will occur under moist conditions. Repeat applications of the tank mix in the same season are not recommended because severe injury may occur.

Apply up to 2.25 pints of this product in 10 to 40 gallons of spray solution per acre. Use the lower rate when treating annual weeds less than 6 inches in height (or runner length). Use the higher labled rate as weeds increase in size or as they approach flower or seedhead formation.

Actively Growing Bahiagrass
For suppression of vegetable growth and seedhead inhibition of bahiagrass for approximately 45 days, apply 4.5 fl oz of this product in 10 to 40 gallons of water per acre. Apply one to two weeks after full greenup or after mowing to a uniform height of 3 to 4 inches. Make this application prior to seedhead emergence. For suppression up to 120 days, apply 3 fl oz of this product per acre, followed by an application of 1.5 to 3 fl oz per acre about 45 days later. Make no more than two applications per year.

Tank Mixes: This product may be used in tank mix combination with other herbicide products to broaden the spectrum of vegetation controlled and for residual weed control. When tank mixing, read and follow all applicable use directions, precautions, and limitation on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture. Any specified rate of this product may be used in a tank mix.

Utility Sites

Use this product for control of brush, tree, and weed control and side trimming in areas including electrical power, pipeline and telephone rights-of-ways, and other sites associated with these rights-of-ways including substations, roadsides, and railroads. This product may be applied with any application equipment or method described on this label unless specifically prohibited.

Tank Mixes: This product may be used in tank mix combination with other herbicide products to broaden the spectrum of vegetation controlled and for residual weed control. When tank mixing, read and follow all applicable use directions, precautions, and limitation on the respective product labels. Use according to the most restrictive precautionary statements for each product in the mixture. Any specified rate of this product may be used in a tank mix.

Rangelands

Use this product to control or suppress many annual weeds growing in perennial cool and warm season grass rangelands. Preventing weed seed production is critical to the successful control of annual grassy weeds invading these perennial grass sites. Eliminate most of the viable seeds with follow up applications in sequential years. Delay grazing of treated areas to encourage growth of desirable perennials. Allowing desirable perennials to flower and reseed in the treated area will encourage successful transition.

***Bromus*:** Use this product to control or suppress downy brome/cheatgrass (*Bromus tectorum*), Japanese brome (*Bromus japonicus*), soft chess (*Bromus mollis*), cheat (*Bromus secalinus*), cereal rye, and jointed goatgrass. Apply 6 to 12 fl oz of this product per acre as a broadcast treatment.

For best results, coincide treatments with early seedhead emergence of the most mature plants. Delaying the application until this growth stage maximizes the emergence of other weedy grass flushes. Make applications to the same site each year until seed banks are depleted and the desirable perennial grasses become established on the site.

Medusahead: Apply 12 fl oz of this product per acre to control or suppress medusahead at the 3-leaf stage when plants are actively growing. Delaying applications beyond this stage results in reduced or_unacceptable control. Repeat applications in subsequent years to eliminate the seed bank before reestablishing desirable perennial grasses. Apply in the fall or spring.

Apply by ground or air. Make aerial applications for these uses with fixed wing or helicopter equipment. For aerial applications, apply in 2 to 10 gallons of water per acre. For ground applications, apply in at least 10 to 20 gallons of water per acre.

Spot Treatment and Wiper Application
Apply this product in rangeland, pastures, or industrial sites as a spot treatment or over the top of desirable grasses using wiper applicators to control tall weeds. See Wiper Application section for specific instructions. Make repeat applications up to the labeled rate in the same area at 30-day intervals.

The entire site or any portion of it may be treated when using 2.25 quarts or less of this product per acre for spot treatments or wiper applications. No more than 10 percent of the total site may be treated at any one time when using more than 2.25 quarts of this product per acre for spot treatments or wiper applications. To achieve maximum performance, remove domestic livestock before application and wait 7 days after application before grazing livestock or harvesting for feed.

Pastures

Type of Pastures: Bahiagrass, bermudagrass, bluegrass, brome, fescue, orchardgrass, ryegrass, timothy, wheatgrass, alfalfa, clover

Spot Treatment and Wiper Application
This product may be applied as a spot treatment or as a wiper application. Make applications in the same area at 30-day intervals. See Wiper Application section for specific instructions.

Precautions:
- For spot treatment and wiper applications, the entire field or any portion of it may be treated when using a rate of 2.25 quarts or less per acre.
- To achieve maximum performance, remove domestic livestock before application and wait 14 days after application before grazing livestock or harvesting.

Restrictions:
- Do not treat more than 10 percent of any acre at one time if applying more than 2.25 quarts per acre as a spot treatment or wiper application.

Preplant, Preemergence, and Pasture Renovation
Apply this product prior to planting or emergence of forage grasses and legumes. In addition, this product may be used to control perennial pasture species listed on this label prior to re-planting.

Precautions:
- If the application rates total 2.25 quarts or less per acre, there is no waiting period between treatment and feeding or livestock grazing is required.
- If the application rates total more than 2.25 quarts per acre, remove domestic livestock before application and wait eight weeks after application before grazing or harvesting.

Restrictions:
- Crops listed for treatment in this label may be planted into the treated area at any time. Wait 30 days between application and planting for all other crops.

Bamboo

Use this product on roadside rights-of way to control or suppress bamboo. Use the higher rate in the rate range for dense stands and larger plants. Mow or cut bamboo and allow it to resprout to have sufficient foliage in order for the spray solution to completely cover the foliage. Optimum control or suppression of bamboo is achieved when this product is applied between August and October (prior to frost). One application of this product plus a surfactant will not eradicate bamboo. Several mowings and applications are required to completely control bamboo.

Apply the specified rate plus a surfactant (1/4 to 1/2% v/v), such as a nonionic surfactant containing 80% active ingredient or more. Using this product without a surfactant results in reduced performance.

Application Method	Rate	Spray Volume (gal/acre)
ground broadcast	1.5 – 7.5 qt/acre	10 - 60
handgun spray to wet	0.75 – 2%	spray to wet
handgun or backpack low volume directed spray	4 – 10%	spray to cover

Restrictions:
- Do not apply more than a total of 8 quarts of this product per acre per year.

Annual Weeds, Perennial Weeds, and Woody Brush and Trees

Annual Weeds

Apply 24 fl oz of this product per acre if weeds are less than 6 inches in height or runner length. Use 1.25 to 3 quarts of this product per acre if weeds are more than 6 inches in height or runner length or when weeds are growing under stressed conditions. Use a higher rate in the rate range for tough to control species regardless of the size of the weed at the time of application. Treat tough to control weeds when they are relatively small. Tank mix this product with only those products that are labeled for application at the target site. Refer to the label of the tank mix partner for use sites and application rates.

Apply a 0.4 percent solution of this product as a spray to wet application to weeds less than 6 inches in height or runner length. Use a 0.7 to 1.5 percent solution for annual weeds more than 6 inches tall or for smaller weeds growing under stressed conditions. Use the higher concentration for tough to control species or for weeds more than 24 inches tall. Apply prior to seedhead formation in grass or bud formation in broadleaf weeds.

Use a 4 to 7 percent solution of this product for low volume directed spray applications. Spray coverage should be uniform with at least 50 percent of the foliage contacted. For best results, cover the top one-half of the plant. To ensure adequate spray coverage, spray both sides of large or tall weeds when foliage is thick and dense or where there are multiple sprouts.

Common Name	Scientific Name
anoda, spurred	*Anoda cristata*
balsamapple[1]	*Momordica charantia*
barley	*Hordeum vulgare*
barnyardgrass	*Echinochloa crus-galli*
bassia, fivehook	*Bassia hyssopifolia*
bittercress	*Cardamine* spp.
bluegrass, annual	*Poa annua*
bluegrass, bulbous	*Poa bulbosa*
brome, downy/cheatgrass	*Bromus tectorum*
brome, Japanese	*Bromus japonicus*
buttercup	*Ranunculus spp.*
Carolina foxtail	*Alopecurus carolinianus*
Carolina geranium	*Geranium carolinianum*
castorbean	*Ricinus communis*
chamomile, mayweed	*Anthemis cotula*
cheat	*Bromus secalinus*
chervil	*Anthriscus cerefolium*
chickweed	*Cerastium vulgatum*
cocklebur, common	*Xanthium strumarium*
coreopsis, plains	*Coreopsis tinctoria*
corn, volunteer	*Zea mays*
crabgrass	*Digitaria* spp.
dwarfdandelion, Virginia	*Krigia virginica*
eastern mannagrass	*Glyceria* spp.
eclipta	*Eclipta prostrata*
falsedandelion	*Pyrrhopappus carolinianus*
falseflax, smallseed	*Camelina microcarpa*
fiddleneck	*Amsinckia* spp.
field pennycress	*Thlaspi arvense*
fleabane, annual	*Erigeron annuus*
fleabane, hairy	*Conyza bonariensis*
fleabane, rough	*Erigeron strigosus*
Florida pusley	*Richardia scabra*
foxtail	*Setaria* spp.
goatgrass, jointed	*Aegilops cylindrica*
goosegrass	*Eleusine indica*
groundsel, common	*Senecio vulgaris*
henbit	*Lamium amplexicaule*
horseweed/marestail	*Conyza canadensis*
itchgrass	*Rottboellia cochinchinensis*
johnsongrass	*Sorghum halepense*
junglerice	*Echinochloa colona*
knotweed	*Polygonum* spp.
kochia[2]	*Kochia scoparia*
lambsquarters, common	*Chenopodium album*
mallow, little	*Malva parviflora*
medusahead	*Taeniatherum caput-medusae*
morningglory	*Ipomoea* spp.
mustard, blue	*Chorispora tenella*
mustard, tumble	*Sisymbrium altissimum*
mustard, wild	*Sinapis arvensis*
oats, wild	*Avena fatua*
panicum, fall	*Panicum dichotomiflorum*
pigweed, redroot	*Amaranthus retroflexus*
pigweed, smooth	*Amaranthus hybridus*
prickly lettuce	*Lactuca serriola*
puncturevine	*Tribulus terrestris*
purslane, common	*Portulaca oleracea*
ragweed, common	*Ambrosia artemisiifolia*
ragweed, giant	*Ambrosia trifida*
rocket, London	*Sisymbrium irio*
Russian-thistle	*Salsola tragus*
rye, cereal	*Secale cereale*
ryegrass, Italian[3]	*Lolium perenne*
sandbur, field	*Cenchrus spinifex*
sesbania, hemp	*Sesbania herbacea*
shattercane	*Sorghum bicolor*
shepherd's-purse	*Capsella bursa-pastoris*
sicklepod	*Senna obtusifolia*
signalgrass, broadleaf	*Urochloa platyphylla*
smartweed, Pennsylvania	*Polygonum pensylvanicum*
sowthistle, annual	*Sonchus oleraceus*
Spanishneedles[3]	*Bidens bipinnata*
speedwell, corn	*Veronica arvensis*
speedwell, purslane	*Veronica peregrina*
sprangletop	*Leptochloa* spp.
spurge, annual	*Chamaesyce* spp.
spurge, prostrate	*Chamaesyce humistrata*
spurge, spotted	*Chamaesyce maculata*
spurry, umbrella	*Holosteum umbellatum*
stinkgrass	*Eragrostis cilianensis*
sunflower, common	*Helianthus annuus*
tansymustard, pinnate	*Descurainia pinnata*
teaweed/sida, prickly	*Sida spinosa*
Texas panicum	*Panicum* spp.

Common Name (Cont.)	Scientific Name
velvetleaf	*Abutilon theophrasti*
Virginia pepperweed	*Lepidium virginicum*
wheat	*Triticum aestivum*
witchgrass	*Panicum capillare*
woolly cupgrass	*Eriochloa villosa*
yellow rocket	*Barbarea vulgaris*

[1]Apply with hand-held equipment only.
[2]Do not treat kochia in the button stage.
[3]Apply 3 pints of product per acre.

Perennial Weeds

Best results are obtained when perennial weeds are treated after they reach the reproductive stage of growth (seedhead initiation in grasses and bud formation in broadleaves). Best results are obtained when non-flowering plants are treated when they reach a mature stage of growth. In many situations, applications are required prior to these growth stages. Under these conditions, use a higher rate in the rate range.

When using spray to wet treatments with hand-held equipment, ensure thorough coverage of the plant. For best results, use a 1.5 percent solution on harder to control perennials including bermudagrass, dock, field bindweed, hemp dogbane, milkweed and Canada thistle.

Use a 4 to 7 percent solution of this product in low volume directed spray applications. Spray coverage should be uniform with at least 50 percent of the foliage contacted. For best results, cover the top one-half of the plant. To ensure adequate spray coverage, spray both sides of large or tall weeds when foliage is thick and dense or where there are multiple sprouts.

Allow 7 days or more after application before tillage.

Common Name	Scientific Name
alfalfa	*Medicago sativa*
alligatorweed[1]	*Alternanthera philoxeroides*
anise/fennel	*Foeniculum vulgare*
artichoke, Jerusalem	*Helianthus tuberosus*
bahiagrass	*Paspalum notatum*
beachgrass, European	*Ammophila arenaria*
bentgrass	*Agrostis* spp.
bermudagrass	*Cynodon dactylon*
bindweed, field	*Convolvulus arvensis*
bluegrass, Kentucky	*Poa pratensis*
blueweed, Texas	*Helianthus ciliaris*
brackenfern	*Pteridium aquilinum*
brome, smooth	*Bromus inermis*
bursage, woollyleaf	*Ambrosia grayi*
canarygrass, reed	*Phalaris arundinacea*
cattail	*Typha* spp.
clover, red	*Trifolium pratense*
clover, white	*Trifolium repens*
cogongrass	*Imperata clylindrica*
cordgrass-	*Spartina spp.*
cutgrass, giant[1]	*Zizaniopsis miliacea*
dallisgrass	*Paspalum dilatatum*
dandelion	*Taraxacum officinale*
dock, curly	*Rumex crispus*
dogbane, hemp	*Apocynum cannabinum*
fescue	*Festuca* spp.
fescue, tall	*Lolium arundinaceum*
German ivy	*Senecio mikanioides*
guineagrass	*Urochloa maxima*
horsenettle	*Solanum carolinense*
horseradish	*Armoracia rusticana*
iceplant, crystalline	*Mesembryanthemum crystallinum*
johnsongrass-	*Sorghum halepense*
kikuyugrass	*Pennisetum clandestinum*
knapweed, Russian	*Acroptilon repens*
lantana, largeleaf-	*Lantana camara*
lespedeza, common	*Kummerowia striata*
lespedeza, sericea-	*Lespedeza cuneata*
loosestrife, purple	*Lythrum salicaria*
lotus, American	*Nelumbo lutea*
maidencane	*Panicum hemitomon*
milkweed	*Asclepias* spp.
muhly, wirestem	*Muhlenbergia frondosa*
mullein, common	*Verbascum thapsus*
napiergrass	*Pennisetum purpureum*
nightshade, silverleaf	*Solanum elaeagnifolium*
nutsedge, purple	*Cyperus rotundus*
nutsedge, yellow	*Cyperus esculentus*
orchardgrass	*Dactylis glomerata*
pampasgrass	*Cortaderia selloana*
paragrass	*Urochloa mutica*
phragmites[2]	*Phragmites* spp.
poison-hemlock	*Conium maculatum*
quackgrass	*Elymus repens*
redvine	*Brunnichia ovata*
reed, giant	*Arundo donax*
ryegrass, perennial	*Lolium perenne*

Common Name (Cont.)	Scientific Name
smartweed, swamp	*Polygonum amphibium*
sowthistle, perennial	*Sonchus arvensis*
spatterdock	*Nuphar lutea*
starthistle, yellow-	*Centaurea solstitialis*
sweet potato, wild[1]	*Ipomoea pandurata*
thistle, artichoke	*Cynara cardunculus*
thistle, Canada	*Cirsium arvense*
timothy	*Phleum pratense*
torpedograss[1-]	*Panicum repens*
trumpetcreeper	*Campsis radicans*
tules, common	*Scirpus acutus*
vaseygrass	*Paspalum urvillei*
velvetgrass	*Holcus* spp.
water fern[3]	*Salvinia spp*
waterhyacinth	*Eichornia crassipes*
waterlettuce	*Pistia stratiotes*
waterprimrose	*Ludwigia* spp.
wheatgrass, western	*Pascopyrum smithii*

[1] Partial control.
[2] Partial control in southeastern states.
[3]Not for use in California

Woody Brush and Trees

Apply this product after full leaf expansion unless otherwise directed. Use the higher labeled rate for larger plants and/or dense areas of growth. On vines, use the higher labled rate for plants that have reached the woody stage of growth. Best results are obtained when application is made in late summer or fall after fruit formation.

In arid areas, best results are obtained when applications are made in the spring or early summer when brush species are at high moisture content and are flowering.

Ensure thorough coverage when using hand-held equipment.

See Low Volume Directed Spray Application section of label. Spray coverage should be uniform with at least 50 percent of the foliage contacted. For best results, cover the top half to 2/3 of the plant foliage. Spray both sides of large or tall woody brush and trees to ensure adequate spray coverage when foliage is thick and dense or where there are multiple sprouts. Symptoms may not appear prior to frost or senescence with fall treatments.

Allow seven days or more after application before tillage, mowing or removal. Repeat treatments up to the labeled rate may be necessary to control plants regenerating from underground parts or seed. Some autumn colors on undesirable deciduous species are acceptable provided no major leaf drop has occurred. Reduced performance may result if fall treatments are made following a frost.

Note: If brush has been mowed or tilled, or trees have been cut, do not treat until regrowth has reached the specified stage of growth.

This product will control, partially control, or suppress the following woody brush and trees.

Common Name	Scientific Name
alder	*Alnus* spp.
ash[1]	*Fraxinus* spp.
aspen, quaking	*Populus tremuloides*
bearclover, bearmat	*Ceanothus prostratus*
beach	*Fagus* spp.
birch	*Betula* spp.
bittercherry	*Prunus emarginata*
blackberry	*Rubus* spp.
blackgum	*Nyssa sylvatica*
blue gum, Tasmanian	*Eucalyptus globulus*
brackenfern	*Pteridium aquilinum*
broom, French	*Genista monspessulana*
broom, Scotch	*Cytisus scoparius*
buckwheat, California[1]	*Eriogonum fasciculatum*
cascara[1]	*Frangula purshiana*
catclaw-vine[1]	*Macfadyena unguis-cati*
ceanothus	*Ceanothus* spp.
chamise	*Adenostoma fasciculatum*
cherry	*Prunus* spp.
cherry, black	*Prunus serotina*
cherry, pin	*Prunus pensylvanica*
copperleaf, hophornbeam	*Acalypha ostryifolia*
coyotebrush	*Baccharis pilularis*
deer vetch	*Lotus unifoliolatus*
dewberry, southern	*Rubus trivialis*
dogwood	*Cornus* spp.
elderberry	*Sambucus nigra*
elm[1]	*Ulmus* spp.
gorse	*Ulex europaeus*
hasardia[1]	*Haplopappus squamosus*
hawthorn	*Crataegus* spp.
hazel	*Corylus* spp.
hickory	*Carya* spp.
holly, Florida	*Schinus terebinthifolius*

Common Name (Cont.)	Scientific Name
honeysuckle	*Lonicera* spp.
hornbeam, American	*Carpinus caroliniana*
kudzu	*Pueraria montana*
locust, black[1-]	*Robinia pseudoacacia*
madrone, Pacific	*Arbutus menziesii*
manzanita	*Arctostaphylos* spp.
maple	*Acer* spp.
maple, red[1]	*Acer rubrum*
maple, sugar	*Acer saccharum*
maple, vine[1]	*Acer circinatum*
monkeyflower[1]	*Mimulus guttatus*
oak	*Quercus* spp.
oak, black[1]	*Quercus kellogia*
oak, pin	*Quercus palustris*
oak, post	*Quercus stellata*
oak, red	*Quercus rubra*
oak, southern red	*Quercus falcata*
oak, white[1]	*Quercus alba*
peppertree, Brazilian	*Schinus terebinthifolius*
persimmon[1]	*Diospyros* spp.
pine	*Pknus* spp.
poison-ivy, eastern	*Toxicodendron radicans*
poison-oak	*Toxicodendron* spp.
poison-sumac[1]	*Toxicodendron vernix*
prunus	*Prunus* spp.
raspberry	*Rubus* spp.
redbud, eastern-	*Cercis canadensis*
rose, multiflora-	*Rosa multiflora*
Russian-olive	*Elaeagnus angustifolia*
sage,: black, white	*Salvia* spp.
sagebrush, California	*Artemisia californica*
salmonberry	*Rubus spectabilis*
saltcedar[1-]	*Tamarix ramosissima*
saltbush, sea myrtle	*Baccharis halimifolia*
sassafras-	*Sassafras albidum*
sourwood[1]	*Oxydendrum arboreum*
sumac, smooth[1]	*Rhus glabra*
sumac, dwarf[1]	*Rhus copallinum*
sweetgum-	*Liquidambar styraciflua*
swordfern[1]	*Polystichum munitum*
tallowtree, Chinese-	*Triadica sebifera*
oak, tanbark resprouts	*Lithocarpus densiflorus*
thimbleberry, western	*Rubus parviflorus*
tobacco, tree[1]	*Nicotiana glauca*
trumpetcreeper-	*Campsis radicans*
Virginia-creeper[1]	*Parthenocissus quinquefolia*
waxmyrtle, southern[1]	*Myrica cerifera*
willow-	*Salix* spp.
yellow-poplar [1-]	*Liriodendron tulipifera*
yerba santa	*Eriodictyon californicum*

[1]Partial control

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If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, to the extent permitted by law, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations of Remedies.

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Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. TO THE EXTENT PERMITTED BY LAW, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

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It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

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(1) Refund of purchase price paid by buyer or user for product bought, or
(2) Replacement of amount of product used.

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Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Label code: CD02-148-020
Replaced label: D02-148-007
LOES number: 010-01471

EPA accepted 11/27/18

Revisions

1. Updated the trademark line to read, "® ™ Trademarks of Dow AgroSciences, DuPont or Pioneer and their affiliated companies or respective owners"
2. Add "Caution" to the Precautionary Statements and combine the statements into one paragraph.
3. Under Rainfastness – revised sentence to read, "Heavy rainfall soon… repeat application up to the labeled rate may be required.
4. Revised 2nd paragraph of Directed Sprays to read, "Injury to larch may occur especially where spray patterns overlap or higher labeled rates of this…"
5. Removed rates and application method from table of Tank Mix Partners for Forestry Sites.
6. Broadcast Applications Outside Areas of Southeastern United States revised to read, "…overlap or the higher labeled rate is applied."
7. Chemical Mowing revised sentence to read, "Repeat applications of the tank mix in the same season are not recommended because severe injury may occur."
8. Add missing table for Hand Held Sprayers to sub-label B
9. Add following statements to Wiper Applications: "Rope or Sponge Wick applications: Use solutions of 33 to 75 percent of this product in water." "Panel Applications: Use solutions of 33 to 100 percent of this product in water."
10. Correct typo under "Hollow Stem Injection" "Do not apply more than a total of 7.5 quarts of this product…"
11. Update Mode of Action banner to reflect provisions in PR Notice 2017-01.

SAFETY DATA SHEET
DOW AGROSCIENCES LLC

Product name: RODEO Herbicide

Issue Date: 11/10/2015
Print Date: 11/10/2015

DOW AGROSCIENCES LLC encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. IDENTIFICATION

Product name: RODEO Herbicide

Recommended use of the chemical and restrictions on use
Identified uses: End use herbicide product

COMPANY IDENTIFICATION
DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD
INDIANAPOLIS IN 46268-1053
UNITED STATES

Customer Information Number: 800-992-5994
info@dow.com

EMERGENCY TELEPHONE NUMBER
24-Hour Emergency Contact: 800-992-5994
Local Emergency Contact: 352-323-3500

2. HAZARDS IDENTIFICATION

Hazard classification
This material is not hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.

Other hazards
No data available

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical nature: Mixture
This product is a mixture.

Component	CASRN	Concentration
Glyphosate IPA salt	38641-94-0	53.75%

Isopropylamine	75-31-0	5.8%
Balance	Not available	40.45%

4. FIRST AID MEASURES

Description of first aid measures
General advice: First Aid responders should pay attention to self-protection and use the recommended protective clothing (chemical resistant gloves, splash protection). If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Skin contact: 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.

Eye contact: Hold eyes 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 eyes. Call a poison control center or doctor for treatment advice.

Ingestion: 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. Never give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed: Aside from the information found under Description of first aid measures (above) and Indication of immediate medical attention and special treatment needed (below), any additional important symptoms and effects are described in Section 11: Toxicology Information.

Indication of any immediate medical attention and special treatment needed
Notes to physician: No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

5. FIREFIGHTING MEASURES

Suitable extinguishing media: To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Straight or direct water streams may not be effective to extinguish fire. General purpose synthetic foams (including AFFF type) or protein foams are preferred if available. Alcohol resistant foams (ATC type) may function.

Unsuitable extinguishing media: No data available

Special hazards arising from the substance or mixture
Hazardous combustion products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating.

Unusual Fire and Explosion Hazards: This material will not burn until the water has evaporated. Residue can burn. Container may vent and/or rupture due to fire. Electrically ground and bond all equipment. Flammable mixtures of this product are readily ignited even by static discharge. May produce flash fire. Vapors are heavier than air and may travel a long distance and accumulate in low lying areas. Ignition and/or flash back may occur. Flammable mixtures may exist within the vapor space of containers at room temperature.

Advice for firefighters
Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Stay upwind. Keep out of low areas where gases (fumes) can accumulate. Water may not be effective in extinguishing fire. Eliminate ignition sources. Move container from fire area if this is possible without hazard. To extinguish combustible residues of this product use water fog, carbon dioxide, dry chemical or foam. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the “Accidental Release Measures” and the “Ecological Information” sections of this (M)SDS.

Special protective equipment for firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures: Isolate area. Refer to section 7, Handling, for additional precautionary measures. Keep unnecessary and unprotected personnel from entering the area. Keep personnel out of low areas. No smoking in area. Eliminate all sources of ignition in vicinity of spill or released vapor to avoid fire or explosion. Vapor explosion hazard. Keep out of sewers. For large spills, warn public of downwind explosion hazard. Check area with combustible gas detector before reentering area. Ground and bond all containers and handling equipment. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

Environmental precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

Methods and materials for containment and cleaning up: Contain spilled material if possible. Pump with explosion-proof equipment. If available, use foam to smother or suppress. Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance. See Section 13, Disposal Considerations, for additional information.

7. HANDLING AND STORAGE

Precautions for safe handling: Keep away from heat, sparks and flame. No smoking, open flames or sources of ignition in handling and storage area. Electrically bond and ground all containers and equipment before transfer or use of material. Use of non-sparking or explosion-proof equipment may be necessary, depending upon the type of operation. Containers, even those that have been emptied,

can contain vapors. Do not cut, drill, grind, weld, or perform similar operations on or near empty containers. Vapors are heavier than air and may travel a long distance and accumulate in low lying areas. Ignition and/or flash back may occur. Never use air pressure for transferring product. Keep out of reach of children. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin, and clothing. Wash thoroughly after handling. Keep container closed. Use with adequate ventilation.

Conditions for safe storage: Minimize sources of ignition, such as static build-up, heat, spark or flame. Keep container closed. Do not store in: Carbon steel. Galvanized containers. Steel. Flammable mixtures may exist within the vapor space of containers at room temperature. Store in a dry place. Store in original container. Do not store near food, foodstuffs, drugs or potable water supplies.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Exposure limits are listed below, if they exist.

Component	Regulation	Type of listing	Value/Notation
Isopropylamine	ACGIH	TWA	5 ppm
	ACGIH	STEL	10 ppm
	OSHA Z-1	TWA	12 mg/m3 5 ppm

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING.

Exposure controls

Engineering controls: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations. Local exhaust ventilation may be necessary for some operations.

Individual protection measures

Eye/face protection: Use safety glasses (with side shields).

Skin protection

Hand protection: Use gloves chemically resistant to this material when prolonged or frequently repeated contact could occur. Examples of preferred glove barrier materials include: Butyl rubber. Natural rubber (“latex”). Neoprene. Nitrile/butadiene rubber (“nitrile” or “NBR”). Polyethylene. Ethyl vinyl alcohol laminate (“EVAL”). Polyvinyl chloride (“PVC” or “vinyl”). NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.

Other protection: Wear clean, body-covering clothing.

Respiratory protection: Respiratory protection should be worn when there is a potential to exceed the exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. For most conditions no respiratory protection should be needed; however, if discomfort is experienced, use an approved air-purifying respirator.

The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	
Physical state	Liquid.
Color	Yellow
Odor	Odorless
Odor Threshold	No data available
pH	4.8 *pH Electrode*
Melting point/range	Not applicable
Freezing point	No data available
Boiling point (760 mmHg)	No data available
Flash point	**closed cup** > 93 °C (> 199 °F) *Setaflash Closed Cup ASTM D3828* none below boiling point
Evaporation Rate (Butyl Acetate = 1)	No data available
Flammability (solid, gas)	No data available
Lower explosion limit	No data available
Upper explosion limit	No data available
Vapor Pressure	No data available
Relative Vapor Density (air = 1)	No data available
Relative Density (water = 1)	1.21 at 22 °C (72 °F) / 4 °C *Pyknometer*
Water solubility	Soluble
Partition coefficient: n-octanol/water	No data available
Auto-ignition temperature	none below 400 degC
Decomposition temperature	No test data available
Dynamic Viscosity	64.6 mPa.s at 20 °C (68 °F)
Kinematic Viscosity	53.4 mm2/s at 20 °C (68 °F)
Explosive properties	No
Oxidizing properties	No significant increase (>5C) in temperature.
Liquid Density	1.20 g/cm3 at 20 °C (68 °F) *Digital density meter*
Molecular weight	No data available

NOTE: The physical data presented above are typical values and should not be construed as a specification.

10. STABILITY AND REACTIVITY

Reactivity: No dangerous reaction known under conditions of normal use.

Chemical stability: Thermally stable at recommended temperatures and pressures.

Possibility of hazardous reactions: Polymerization will not occur.

Conditions to avoid: Active ingredient decomposes at elevated temperatures. Avoid static discharge.

Incompatible materials: Heat produced by the reaction with water will cause vaporization. Flammable hydrogen may be generated from contact with metals such as:

Hazardous decomposition products: Decomposition products depend upon temperature, air supply and the presence of other materials.

11. TOXICOLOGICAL INFORMATION

Toxicological information appears in this section when such data is available.

Acute toxicity

Acute oral toxicity
Very low toxicity if swallowed. Harmful effects not anticipated from swallowing small amounts.

As product:
LD50, Rat, male and female, > 5,000 mg/kg

Acute dermal toxicity
Prolonged skin contact is unlikely to result in absorption of harmful amounts.

As product:
LD50, Rabbit, male and female, > 5,000 mg/kg

Acute inhalation toxicity
No adverse effects are anticipated from single exposure to mist. Excessive exposure may cause irritation to upper respiratory tract (nose and throat).

As product:
LC50, Rat, male and female, 4 Hour, dust/mist, > 6.37 mg/l No deaths occurred at this concentration.

Skin corrosion/irritation
Brief contact is essentially nonirritating to skin.

Serious eye damage/eye irritation
May cause slight temporary eye irritation.
Corneal injury is unlikely.

Sensitization
Did not cause allergic skin reactions when tested in guinea pigs.

For respiratory sensitization:
No relevant data found.

Specific Target Organ Systemic Toxicity (Single Exposure)
Evaluation of available data suggests that this material is not an STOT-SE toxicant.

Specific Target Organ Systemic Toxicity (Repeated Exposure)
For similar active ingredient(s).
Glyphosate.
Based on available data, repeated exposures are not anticipated to cause significant adverse effects.
For the minor component(s):
In animals, effects have been reported on the following organs after inhalation:
Eye.
Respiratory tract.

Carcinogenicity
For similar material(s): Glyphosate. Did not cause cancer in laboratory animals. Weight of evidence evaluation of epidemiology studies supports no association between glyphosate exposure and cancer.

Teratogenicity
For similar active ingredient(s). Glyphosate. Has been toxic to the fetus in laboratory animals at doses toxic to the mother. Did not cause birth defects in laboratory animals.

Reproductive toxicity
For similar active ingredient(s). Glyphosate. In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals.

Mutagenicity
For the active ingredient(s): In vitro genetic toxicity studies were negative in some cases and positive in other cases. Animal genetic toxicity studies were negative in some cases and positive in other cases.

Aspiration Hazard
Based on physical properties, not likely to be an aspiration hazard.

Carcinogenicity

Component	List	Classification
Glyphosate IPA salt	IARC	Group 2A: Probably carcinogenic to humans

12. ECOLOGICAL INFORMATION

Ecotoxicological information appears in this section when such data is available.

Toxicity

Acute toxicity to fish
Material is slightly toxic to aquatic organisms on an acute basis (LC50/EC50 between 10 and 100 mg/L in the most sensitive species tested).

LC50, Oncorhynchus mykiss (rainbow trout), 96 Hour, > 2,500 mg/l, OECD Test Guideline 203 or Equivalent

Acute toxicity to aquatic invertebrates
EC50, Daphnia magna (Water flea), 48 Hour, 918 mg/l, OECD Test Guideline 202 or Equivalent

Acute toxicity to algae/aquatic plants

ErC50, Pseudokirchneriella subcapitata (green algae), 72 Hour, 127 mg/l, OECD Test Guideline 201 or Equivalent

Toxicity to Above Ground Organisms
Material is practically non-toxic to birds on an acute basis (LD50 > 2000 mg/kg).

oral LD50, Colinus virginianus (Bobwhite quail), > 2000mg/kg bodyweight.

contact LD50, Apis mellifera (bees), > 100µg/bee

oral LD50, Apis mellifera (bees), > 100µg/bee

Persistence and degradability

Glyphosate IPA salt

Biodegradability: For similar active ingredient(s). Glyphosate. Biodegradation may occur under aerobic conditions (in the presence of oxygen).

Photodegradation
Test Type: Half-life (indirect photolysis)
Sensitizer: OH radicals
Atmospheric half-life: 0.115 d
Method: Estimated.

Isopropylamine

Biodegradability: Material is readily biodegradable. Passes OECD test(s) for ready biodegradability. Material is ultimately biodegradable (reaches > 70% mineralization in OECD test(s) for inherent biodegradability).
10-day Window: Pass
Biodegradation: 70 - 80 %
Exposure time: 28 d
Method: OECD Test Guideline 301F or Equivalent

Theoretical Oxygen Demand: 3.53 mg/mg

Chemical Oxygen Demand: 1,300 - 1,975 mg/g

Biological oxygen demand (BOD)

Incubation Time	BOD
5 d	18.3 %
10 d	54 %
20 d	59 %

Photodegradation
Test Type: Half-life (indirect photolysis)
Sensitizer: OH radicals
Atmospheric half-life: 3.26 Hour
Method: Estimated.

Balance

Biodegradability: No relevant data found.

Bioaccumulative potential

Bioaccumulation: For similar active ingredient(s). Bioconcentration potential is low (BCF < 100 or Log Pow < 3).

Mobility in soil

For similar active ingredient(s).
Expected to be relatively immobile in soil (Koc > 5000).

13. DISPOSAL CONSIDERATIONS

Disposal methods: If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

14. TRANSPORT INFORMATION

DOT

Not regulated for transport

Classification for SEA transport (IMO-IMDG):

Not regulated for transport

Transport in bulk according to Annex I or II of MARPOL 73/78 and the IBC or IGC Code Consult IMO regulations before transporting ocean bulk

Classification for AIR transport (IATA/ICAO):

Not regulated for transport

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Transportation classifications may vary by container volume and may be influenced by regional or country variations in regulations. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. REGULATORY INFORMATION

OSHA Hazard Communication Standard
This product is not a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312
Chronic Health Hazard

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313
This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

Pennsylvania (Worker and Community Right-To-KnowAct): Pennsylvania Hazardous Substances List and/or Pennsylvania Environmental Hazardous Substance List:
The following product components are cited in the Pennsylvania Hazardous Substance List and/or the Pennsylvania Environmental Substance List, and are present at levels which require reporting.

Components	CASRN
Isopropylamine	75-31-0

Pennsylvania (Worker and Community Right-To-KnowAct): Pennsylvania Special Hazardous Substances List:
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

United States TSCA Inventory (TSCA)
This product contains chemical substance(s) exempt from U.S. EPA TSCA Inventory requirements. It is regulated as a pesticide subject to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements.

Federal Insecticide, Fungicide and Rodenticide Act
EPA Registration Number: 62719-324
This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

CAUTION

Harmful if inhaled

16. OTHER INFORMATION

Hazard Rating System
NFPA

Health	Fire	Reactivity
1	2	0

Revision
Identification Number: 101188488 / A211 / Issue Date: 11/10/2015 / Version: 4.0
DAS Code: NAF-552
Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

ACGIH	USA. ACGIH Threshold Limit Values (TLV)
OSHA Z-1	USA. Occupational Exposure Limits (OSHA) - Table Z-1 Limits for Air Contaminants
STEL	Short-term exposure limit
TWA	8-hour, time-weighted average

Information Source and References
This SDS is prepared by Product Regulatory Services and Hazard Communications Groups from information supplied by internal references within our company.

DOW AGROSCIENCES LLC urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

Specimen Label

TRICLOPYR	GROUP	4	HERBICIDE

Dow AgroSciences

Garlon® 4 Ultra

SPECIALTY HERBICIDE

®Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

For the control of woody plants and vines, and annual and perennial broadleaf weeds on

- **Forest sites,**
- **non cropland areas including: electrical power and utility rights-of-way, industrial sites, non-irrigation ditch banks, pipelines, railroads, roadsides; and**
- **natural areas and wildlife habitat and management areas;**
- **including grazed areas on all of these listed sites.**

Active Ingredient:
triclopyr: 2-[(3,5,6-trichloro-2-pyridinyl)oxy] acetic acid, butoxyethyl ester 60.45%
Other Ingredients..... 39.55%
Total..... 100.00%

Acid equivalent: triclopyr – 43.46% - 4 lb/gal

Precautionary Statements

Hazards to Humans and Domestic Animals

EPA Reg. No. 62719-527

Keep Out of Reach of Children

CAUTION

Causes Moderate Eye Irritation • Harmful If Swallowed • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Reactions In Some Individuals

Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

Personal Protective Equipment (PPE)

Applicators and other handlers who handle this pesticide must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, or viton ≥14 mils
- Shoes plus socks

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

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 Recommendations

Users should:

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

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

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water, 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.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Read all Directions for Use carefully before applying.

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 12 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 made of barrier laminate, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, or viton ≥14 mils
- Shoes plus socks

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.

Entry Restrictions for Non-WPS Uses: Do not enter or allow others to enter the treated area until sprays have dried.

Storage and Disposal

Do not contaminate water, food, or feed by storage and disposal.
Pesticide Storage: Store above 28°F or agitate before use.
Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. Open dumping is prohibited.

Storage and Disposal (Cont.)

Nonrefillable containers 5 gallons or less:
Container Handling: Nonrefillable container. Do not reuse or refill this container.
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. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Refillable containers 5 gallons or larger:
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. 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. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Nonrefillable containers 5 gallons or larger:
Container Handling: Nonrefillable container. Do not reuse or refill this container.
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. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. 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. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Product Information

Garlon 4 Ultra specialty herbicide is recommended for the control of woody plants and vines, and herbaceous broadleaf weeds on forest sites, conifer plantations, non-cropland areas, including airports, barrow ditches, communication transmission lines, electrical power and utility rights-of-way, fencerows, gravel pits, industrial sites, military lands, mining and drilling areas, non-irrigation ditch banks, oil and gas pads, parking lots, petroleum tank farms, pipelines, railroads, roadsides, storage areas, storm water retention areas, substations, unimproved rough turf grasses, vacant lots and other non-crop residential areas; and natural areas (open space) for example campgrounds, parks, prairie management, trials and trialheads, recreation areas, wildlife openings, and wildlife habitat and management areas including grazed area on all these listed sites.

Use Precautions

When applying this product in tank mix combination, follow all applicable use directions and precautions on each manufacturer's label. It is the pesticide user's responsibility to ensure that all products in the listed mixtures are registered for the intended use. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Sprays applied directly to Christmas trees may result in conifer injury. When treating unwanted vegetation in Christmas tree plantations, care should be taken to direct sprays away from conifers.

Garlon 4 Ultra is formulated as a low volatile ester. However, the combination of spray contact with impervious surfaces, such as roads and rocks, and increasing ambient air temperatures, may result in an increase in the volatility potential for this herbicide, increasing a risk for off-target injury to sensitive crops such as grapes and tomatoes.

Use Restrictions

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

Do not apply Garlon 4 Ultra directly to, or otherwise permit it to come into direct contact with cotton, grapes, peanuts, soybeans, tobacco, vegetable crops, flowers, citrus, or other desirable broadleaf plants. Do not permit spray mists containing it to drift onto such plants.

It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands (such as flood plains, deltas, marshes, swamps, or bogs) and transitional areas between upland and lowland sites where surface water is not present except in isolated pockets due to uneven or unlevel conditions. Do not apply to open water (such as lakes, reservoirs, rivers, streams, creeks, salt water bays, or estuaries).

Do not apply on ditches that are used to transport irrigation water. Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result.

Do not apply this product using mist blowers.

Maximum Use Rates

- Apply no more than 2 lb ae of triclopyr (2 quarts of Garlon 4 Ultra) per acre per growing season on range and pasture sites, or any area where grazing or harvesting hay is allowed.
- On forestry sites, apply no more than 6 lb ae of triclopyr (6 quarts of Garlon 4 Ultra) per acre per year.
- For all use sites other than range, pasture, forestry sites, and grazed /hayed areas, apply no more than 8 lb ae triclopyr (8 quarts of Garlon 4 Ultra) per acre per year.
- See Table 1 below for relationship between mixing rate, spray volume, and maximum application rate.

Grazing

- There are no grazing restrcitions for livestock or dairy animals on treated areas
- Portions of grazed areas that intersect treated non-cropland and rights-of-way sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Haying (harvesting of dried forage)

- Do not harvest hay for 14 days after application.

Slaughter Restriction: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

Avoid Injurious Spray Drift
Make applications only when there is little or no hazard from spray drift. Small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants that are near enough to be injured. It is suggested that a continuous smoke column at or near the spray site or a smoke generator on the spray equipment be used to detect air movement, lapse conditions, or temperature inversions (stable air). If the smoke layers or indicates a potential of hazardous spray drift, do not spray.

Aerial Application (Helicopter Only): For aerial application on rights-of-way or other areas near susceptible crops, apply through a Microfoil[1] or Thru-Valve[1] boom, or other drift control application equipment and/or use an agriculturally labeled drift control additive. If a spray thickening agent is used, follow all use recommendations and precautions on the product label. Spray only when the wind velocity is low (follow state regulations). Avoid application during air inversions.

[1] Reference within this label to a particular piece of equipment produced by or available from other parties is provided without consideration for use by the reader at its discretion and subject to the reader's independent circumstances, evaluation, and expertise. Such reference by Dow AgroSciences is not intended as an endorsement of such equipment, shall not constitute a warranty (express or implied) of such equipment, and is not intended to imply that other equipment is not available and equally suitable. Any discussion of methods of use of such equipment does not imply that the reader should use the equipment other than is advised in directions available from the equipment's manufacturer. The reader is responsible for exercising its own judgment and expertise, or consulting with sources other than Dow AgroSciences, in selecting and determining how to use its equipment.

Spray Drift Management
Avoiding spray drift at the application site is the responsibility of the applicator. 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 drift movement from aerial applications:

- The distance of the outer most operating nozzles on the boom must not exceed 3/4 the length of the rotor.
- 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 must be observed.

The applicator should be familiar with and take into account the information covered in the following Aerial Drift Reduction Advisory. [This information is advisory in nature and does not supersede mandatory label requirements.]

Aerial Drift Reduction Advisory
Information on 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 manufacturer's recommended pressures. For many nozzle types lower pressure produces larger 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 recommended 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 rotor length may further reduce drift without reducing swath width.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest 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 to 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 local, low level 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 the 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 potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Ground Equipment: To aid in reducing spray drift potential when making ground applications near susceptible crops or other desirable broadleaf plants, Garlon 4 Ultra should be used in thickened (high viscosity) spray mixtures using an agriculturally labeled drift control additive, high viscosity invert system, or equivalent as directed by the manufacturer. When using a spray thickening or inverting additive, follow all use directions and precautions on the product label. With ground equipment, spray drift can be reduced by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by keeping the operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when wind velocity is low. Do not apply with nozzles that produce a fine droplet spray. Select nozzles and pressures which provide adequate plant coverage, but minimize the production of fine spray particles.

High Volume Leaf-Stem Treatment: To minimize spray drift, keep sprays no higher than brush tops and keep spray pressures low enough to provide coarse spray droplets. A agriculturally labeled thickening agent may be used to reduce spray drift.

Mixing Directions for all use sites

Garlon 4 Ultra may be foliarly applied by diluting with water or by preparing an oil-water emulsion. For woody plant control, an oil-water emulsion performs more dependably under a broader range of conditions than a straight water dilution and is recommended for aerial applications.

Oil-Water Mixture Sprays
Prepare a premix of oil, surfactant and Garlon 4 Ultra in a separate container using diesel fuel, fuel oil, or kerosene plus an emulsifier such as Sponto 712 or Triton X-100. Use a jar test to check spray mix compatibility before preparing oil-water emulsion sprays in the mixing tank. Do not allow any water or mixtures containing water to get into the premix or Garlon 4 Ultra since a thick "invert" (water in oil) emulsion may form that will be difficult to break. Such an emulsion may also be formed if the premix of Garlon 4 Ultra is put into the mixing tank before the addition of water. Fill the spray tank about one-half full with water, then slowly add the premix with continuous agitation and complete filling the tank with water. Continue moderate agitation.

Oil Mixture Sprays for Basal Treatment
Prepare oil-based spray mixtures using either a commercially available basal oil, kerosene diesel fuel, or No. 1 or No. 2 fuel oil. Substitute other oils or diluents only as recommended by the oil or diluent's manufacturer. When mixing an oil mixture, read and follow the use directions and precautions on the manufacturer's product label. Add Garlon 4 Ultra to the required amount of oil in the spray tank or mixing tank and mix thoroughly. If the mixture stands over four hours, reagitation is required.

Oil Mixtures of Garlon 4 Ultra and Tordon 22K: Tordon 22K and Garlon 4 Ultra may be used in tank mix combination for basal bark treatment of woody plants. These herbicides are incompatible and will not form a stable mixture when mixed together directly in oil. Make a stable tank mixture for basal bark application by first combining each product with a compatibility agent prior to final mixing in the desired ratio. Tordon 22K is not registered for use in the states of California and Florida.

Herbicide Resistance Management:

Triclopyr, the active ingredient in this product, is a Group 4 herbicide based on the mode of action classification system of the Weed Science Society of America.

Any weed population may contain or develop plants resistant to Group 4 herbicides. Resistant weeds may dominate the weed population if these herbicides are used repeatedly in the same field. Such resistant weed plants may not be effectively managed using Group 4 herbicides but may be effectively managed utilizing other herbicides alone or in mixtures from a different herbicide Groups that are labeled for control of these weeds and/or by using cultural or mechanical practices. However, a herbicide mode of action classification by itself may not adequately address specific weeds that are resistant to specific herbicides.

Rotate the use of Garlon 4 Ultra or other Group 4 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds in a field.

Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use less the resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or certified crop advisor if you are unsure as to which active ingredient is less prone to resistance.

Adopt an integrated weed management program for herbicide use that includes scouting and uses historical information related to herbicide use and crop rotation that considers tillage (or other mechanical control methods), cultural, biological, and other management practices.

Scout after a herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: (1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; (2) a spreading patch of non-controlled plants of a particular weed species; (3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected , prevent weed seed production in the affected area by an alternative herbicide from a different group or by mechanical method such as hoeing, mowing or tillage. Prevent movement of resistant weed seeds to other firlds by cleaning harvesting and tillage equipment when moving between fields, and planting clean seed.

If a weed population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.

Contact your local extension specialist or certified crop advisor for additional pesticide resistance management or integrated weed management recommendations for specific use sites.

Plants Controlled by Garlon 4 Ultra

Woody Plants Controlled

Common Name	Scientific Name	Life Cycle	Plant Family
acacia, twisted	*Acacia tortuosa*	perennial	Fabaceae
alder	*Aldus spp.*	perennial	Betulaceae
arrowwood	*Viburnum ventanum*	perennial	Caprifoliaceae
ash	*Fraxinus spp.*	perennial	Oleaceae
aspen	*Populus tremuloides*	perennial	Salicaceae
bear clover (bearmat)	*Chamaebatia foliolosa*	perennial	Fabaceae
beech	*Fagus spp.*	perennial	Fagaceae
birch	*Betula spp.*	perennial	Betulaceae
blackberry	*Rubus spp.*	perennial	Rosaceae
blackbrush	*Acacia rigidula*	perennial	Fabaceae
blackgum	*Nyssa salvatica*	perennial	Cornaceae
boxelder (1)	*Acer negundo*	perennial	Aceraceae
Brazilian pepper	*Schinus terebinthifolius*	perennial	Anacardiaceae
buckthorn	*Rhamnus spp.*	perennial	Rhamnaceae
cascara	*Rhamnus pushiana*	perennial	Rhamnaceae
ceanothus	*Ceanothus spp.*	perennial	Rhamnaceae
cherry	*Prunus spp.*	perennial	Rosaceae
cherry, choke	*Prunus virginiana*	perennial	Rosaceae
chinquapin	*Quercus muhlenbergii*	perennial	Fagaceae
cottonwood	*Populus deltoides*	perennial	Salicaceae
crataegus (hawthorn)	*Crataegus spp.*	perennial	Rosaceae
creeper, virginia (1)	*Parthenocissus quinquefolia*	perennial	Vitaceae
dogwood	*Cornus spp.*	perennial	Cornaceae
douglas-fir	*Psuedotsuga menziesii*	perennial	Pinaceae
elderberry	*Sambucus Canadensis*	perennial	Caprifoliaceae
elm	*Ulmus, spp*	perennial	Ulmaceae
elm, winged	*Ulmus alata*	perennial	Ulmaceae
gallberry	*Ilex coriacea*	perennial	Aquifoliaceae
granjeno	*Celtis ehrenbergiana*	perennial	Ulmaceae
guajillo	*Acacia berlandieri*	perennial	Fabaceae
guava	*Psidium guajava*	perennial	Myrtaceae
gorse	*Ulex europaeus*	perennial	Fabaceae
hazel	*Corylus americana*	perennial	Betulaceae
hickory	*Carya spp.*	perennial	Juglandaceae
hornbeam	*Carpinus spp.*	perennial	Betulaceae
huisache (suppression)	*Acacia farnesiana*	perennial	Fabaceae
ivy, poison	*Tooxicodendron radicans*	perennial	Anacardiaceae
kudzu	*Pueraria lobata*	perennial	Fabaceae
locust	*Robinia spp.*	perennial	Fabaceae
madrone	*Arbutus spp.*	perennial	Ericaceae
magnolia, sweetbay	*Magnolia viginiana*	perennial	Magnoliaceae
maples	*Acer spp.*	perennial	Aceraceae
maple, bigleaf (1)	*Acer macrophyllum*	perennial	Aceraceae
milkweed vine (1)	*Asclepias spp.*	perennial	Asclepiaceae
mulberry	*Morus spp.*	perennial	Moraceae
myrtle. wax	*Morella cerifera*	perennial	Myricaceae
oaks	*Quercus spp.*	perennial	Fagaceae

Plants Controlled by Garlon 4 Ultra (Cont.)

Woody Plants Controlled

Common Name	Scientific Name	Life Cycle	Plant Family
oak, poison	*Toxicodendron diversilobum*	perennial	Anacardiaceae
osage orange	*Maclura pomifera*	perennial	Moraceae
peppervine	*Ampelopsis arborea*	perennial	Vitaceae
persimmon	*Disospyros spp.*	perennial	Ebenaceae
pine	*Pinus spp.*	perennial	Pinaceae
poplar	*Populus spp.*	perennial	Salicaceae
poplar, tulip	*Liriodendron tulipifera*	perennial	Magnoliaceae
primrose, willow	*Ludwigia peruviana*	perennial	Onagraceae
rose, wild	*Rosa spp.*	perennial	Rosaceae
salmonberry	*Rubus spectabalis*	perennial	Rosaceae
saltbush (silver myrtle)	*Baccharis spp*	perennial	Asteraceae
saltcedar	*Tamarix spp.*	perennial	Tamariaceae
sassafrass	*Sassafras spp.*	perennial	Lauraceae
scotchbroom	*Cytisus scoparius*	perennial	Fabaceae
sumac	*Rhus spp.*	perennial	Anacardiaceae
sweetgum	*Liquidamber styraciflura*	perennial	Hamamelidaceae
sycamore	*Platanus occidentalis*	perennial	Plantanaceae
tanoak	*Notholithocarpus densiflorus*	perennial	Fagaceae
tree of heaven	*Ailanthus altissima*	perennial	Simaroubaceae
trumpet creeper (1)	*Campsis radicans*	perennial	Bignoniaceae
willow	*Salix spp.*	perennial	Saliciaceae

[1]For best control, use either a basal bark or cut stump treatment.
[2]For complete control, re-treatment may be necessary.

Annual and Perennial Broadleaf Weeds

Common Name	Scientific Name	Life Cycle	Plant Family
beggarweed, creeping	*Desmodium incanum*	perennial	Fabaceae
bindweed, field (top growth)	*Convolvulus arvensis*	perennial	Convolulaceae
burdock, common	*Arctium minus*	biennial	Asteraceae
carrot, wild	*Daucus carota*	biennial	Apiaceae
chicory	*Cichorium intybus*	perennial	Asteraceae
cinquefoil, sulfur (2)	*Potentilla recta*	perennial	Rosaceae
clover	*Trifolium spp.*	perennial	Fabaceae
dandelion (top growth)	*Taraxacum oficinale*	perennial	Asteraceae
dock, curly	*Rumex crispus*	perennial	Polygonaceae
dogfennel	*Eupatorium capillifolium*	perennial	Asteraceae
goldenrod	*Solidago spp.*	perennial	Asteraceae
ivy, ground	*Glecoma hederacea*	perennial	Lamiaceae
kudzu	*Pueraria montana*	perennial	Fabaceae
lambsquarters	*Chenopodium spp.*	annual	Chenopodiaceae
lespedeza, annual	*Lespedeza striata*	annual	Fabaceae
lespedeza, Sericea (1)	*Lespedeza cuneata*	perennial	Fabaceae
lettuce, prickly	*Latuca serriola*	annual	Asteraceae
matchweed	*Lippia nodiflora*	perennial	Verbanaceae
medic, black	*Medicago lupulina*	perennial	Fabaceae
mustard	*Brassica spp.*	annual	Brassicaceae
muistard, garlic (4)	*Alliaria petiolata*	biennial	Brassicaceae
plantain	*Plantago spp.*	annual	Plantaginaceae
ragweed, common	*Ambrosia artemisiifolia*	annual	Asteraceae
ragweed, western	*Ambrosia psilostachya*	perennial	Asteraceae
smartweed, Pennsylvania	*Polygonum pensylvanicum*	annual	Polygonaceae
soda apple, tropical (3)	*Solanum viarum*	perennial	Solanaceae
thistle, bull	*Cirsium vulgare*	biennial	Asteraceae
thistle, Canada	*Cirsium arvense*	perennial	Asteraceae
vetch	*Vicia spp.*	perennial	Fabaceae
violet, wild	*Viola papilionacea*	perennial	Violaceae
yarrow, common	*Achillea millefolium*	perennial	Asteraceae

1. **Sericea lespedeza:** Apply 1 to 2 pints of Garlon 4 Ultra per acre. For best results, apply after maximum foliage development in the late spring to early summer, but prior to bloom.
2. **Sulfur cinquefoil:** Apply 1 to 2 pints of Garlon 4 Ultra per acre. For best results, apply to plants in the rosette stage.
3. **Tropical soda apple:** Apply 2 pints of Garlon 4 Ultra per acre when tropical soda apple plants reach the first flower stage. For best results, apply in a total spray volume of 40 gallons per acre using ground equipment. An agricultural surfactant may be added at the manufacturer's recommended rate to provide more complete wetting and coverage of the foliage. Spot treatments may be used to control sparse plant stands. For spot treatment use a 1 to 1.5% solution of Garlon 4 Ultra in water (1 to 1 1/2 gallons of Garlon 4 Ultra in 100 gallons total spray mixture) and spray the entire plant to completely wet the foliage. **In Florida**, control of tropical soda apple may be improved by using the following management practices:
   - Mow plants to a height of 3 inches every 50 to 60 days or whenever they reach flowering. Continue the mowing operation through April.
   - In late May to June (50 to 60 days after the April mowing), apply Garlon 4 Ultra as a broadcast treatment.
   - Use spot treatment to control any remaining plants or thin stands of plants that germinate following a broadcast treatment
4. **Garlic mustard:** apply as a 1.25 to 2.5% v/v foliar spray-to-wet application

Use Information

Use Garlon 4 Ultra at rates of 1 to 8 quarts per acre to control broadleaf weeds and woody plants. It is suggested that rates higher in this rate range be used to control woody plants. In all cases, use the amount specified in enough water to give uniform and complete coverage of the plants to be controlled. The order of addition to the spray tank is water, spray thickening agent (if used), surfactant (if used), additional herbicide (if used), and Garlon 4 Ultra. If a standard agricultural surfactant is used, use at a rate of 1 to 2 quarts per acre. Use continuous adequate agitation.

Before using any recommended tank mixtures, read the directions and all precautions on both labels.

For best results apply when woody plants and weeds are actively growing. When hard to control species such as ash, blackgum, choke cherry, elm, maples (other than vine or big leaf), oaks, pines, or winged elm are prevalent, during applications made during late summer when the plants are mature, or during drought conditions, use the higher rates of Garlon 4 Ultra alone or in combination with Graslan L or Tordon 22K herbicide. Graslan L and Tordon 22K are restricted use pesticides. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

When using Garlon 4 Ultra in combination with Freelexx or a 2,4-D low volatile ester herbicide, generally the higher rates of Garlon 4 Ultra should be used for satisfactory brush control.

Use the higher dosage rates when brush approaches an average of 15 feet in height or when the brush covers more than 60% of the area to be treated. If lower rates are used on hard to control species, resprouting may occur the year following treatment.

On sites where easy to control brush species dominate, rates less than those listed may be effective. Consult state or local extension personnel for such information.

Foliage Treatment With Ground Equipment

High Volume Foliage Treatment

For control of woody plants, use Garlon 4 Ultra at the rate of 2 to 6 quarts per 100 gallons of spray mixture, or Garlon 4 Ultra at 2 to 4 quarts may be tank mixed with labeled rates of Freelexx or a 2,4-D low volatile ester herbicide, Graslan L, or Tordon 22K and diluted to make 100 gallons of spray. Do not apply more than 2 gallons of Garlon 4 Ultra per acre. Apply at a volume of 100 to 400 gallons of total spray per acre depending upon size and density of woody plants. Graslan L and Tordon 22K are not registered for use in the states of California and Florida. When tank mixing, follow applicable use directions and precautions on each manufacturer's label.

Depending upon the size and density of the woody plants, apply sufficient spray volume to thoroughly wet all leaves, stems, and root collars. To minimize spray drift, select the minimum spray pressure that provides adequate plant coverage without forming a mist and direct sprays no higher than the top of the target plants. Use a drift control additive cleared for application to growing crops to reduce spray drift. Before using any tank mixture, read the directions and use precautions on both labels. For best results, apply when woody plants and weeds are actively growing.

Table 1: The following table is provided as a guide to the user to achieve the proper rate of Garlon 4 Ultra on forestry and non cropland sites

Total Spray Volume (gallons/acre)	Rate of Garlon 4 Ultra	
	Forestry Sites (qt/100 gallons of spray)[1]	Non-Cropland Sites (qt/100 gallons of spray)[2]
400	1.5	2
300	2	2.7
200	3	4
100	6	8
50	12	16
40	15	20
30	20	26.7
20	30	40
10	60	80

[1]Do not exceed the maximum use rate of 6 quarts of Garlon 4 Ultra (6 lb ae of triclopyr) per acre per year.

[2]Do not exceed the maximum use rate of 8 quarts of Garlon 4 Ultra (8 lb ae of triclopyr) per acre per year for non-grazable areas, or 2 quarts (2 lb ae of triclopyr) per acre per year for grazed areas, except on portions of grazed areas that meet the following requirement. Portions of grazed areas that intersect treated non-cropland, rights-of-way and forestry sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Low Volume Foliar Treatment

To control susceptible woody plants, mix up to 5% v/v of Garlon 4 Ultra in water and apply 10 to 100 gallons of finished spray. The spray concentration of Garlon 4 Ultra and total spray volume per acre should be adjusted according to the size and density of target woody plants and kind of spray equipment used. With low volume sprays, use sufficient spray volume to obtain uniform coverage of target plants including the surfaces of all foliage, stems, and root collars (see Use Precautions and Restrictions). For best results, a surfactant should be added to all spray mixtures. Match equipment and delivery rate of spray nozzles to height and density of woody plants. When treating tall, dense brush, a truck mounted spray gun with spray tips that deliver up to 2 gallons per minute at 40 to 60 psi may be required. Backpack or other types of specialized spray equipment with spray tips that deliver less than 1 gallon of spray per minute may be appropriate for short, low to moderate density brush.

See Table 1 for relationship between mixing rate, spray volume and maximum application rate.

Tank Mixing: As a low volume foliar spray, up to 9 quarts of Garlon 4 Ultra may be applied in tank mix combination with labeled rates of Tordon 22K or Graslan L in 10 to 100 gallons of finished spray. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Broadcast Applications With Ground Equipment

Apply Garlon 4 Ultra using equipment that will assure thorough and uniform coverage at spray volumes applied. See Table 1 for relationship between mixing rate, spray volume and maximum application rate.

Woody Plant Control

Foliage Treatment: Use 4 to 8 quarts of Garlon 4 Ultra in enough water to make 5 gallons or more per acre of total spray, or 1 1/2 to 3 quarts of Garlon 4 Ultra may be combined with labeled rates of Freelexx or a 2,4-D low volatile ester, Graslan L, or Tordon 22K in sufficient water to make 5 gallons or more per acre of total spray. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Broadleaf Weed Control

Use Garlon 4 Ultra at rates of 1 to 4 quarts in a total volume of 5 gallons or more per acre as a water spray mixture. Apply anytime weeds are actively growing. Garlon 4 Ultra at 0.25 to 3 quarts may be tank mixed with labeled rates of Freelexx or a 2,4-D amine or low volatile ester, Tordon 22K, or Graslan L to improve the spectrum of activity. For thickened (high viscosity) spray mixtures, Garlon 4 Ultra can be mixed with diesel oil or other inverting agent. When using an inverting agent, read and follow the use directions and precautions on the product label. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Aerial Application (Helicopter Only)

Aerial sprays should be applied using suitable drift control (see Use Precautions and Restrictions).

Foliage Treatment (Utility and Pipeline Rights-of-Way)

Use 4 to 8 quarts of Garlon 4 Ultra alone, or 3 to 4 quarts of Garlon 4 Ultra in a tank mix combination with labeled rates of Frelexx or a 2,4-D low volatile ester, Graslan L or Tordon 22K and apply in a total spray volume of 10 to 30 gallons per acre. Use the higher rates and volumes when plants are dense or under drought conditions. Graslan L and Tordon 22K are not registered for use in the states of California and Florida.

Portions of grazed areas that intersect treated non-cropland, rights-of-way and forestry sites may be treated at up to 8 lb ae per acre if the area to be treated on the day of application comprises no more than 10% of the total grazable area.

Basal Bark, Dormant Stem and Cut Surface Treatments for use on all sites

Individual plant treatments such as basal bark and cut surface applications may be used on any use site listed on this label at a maximum use rate of 8 quarts of Garlon 4 Ultra (8 lb ae of triclopyr) per acre. These types of applications are made directly to ungrazed parts of plants and, therefore, are not restricted by the grazing maximum rate of 2 quarts of Garlon 4 Ultra (2 lb ae of triclopyr) per acre.

Conventional Basal Bark Treatment
To control susceptible woody plants with stems less than 6 inches in basal diameter, mix 1 to 5 gallons of Garlon 4 Ultra in enough oil to make 100 gallons of spray mixture. Apply with backpack sprayer or power spraying equipment using low pressure (20 to 40 psi). Spray the basal parts of brush and tree trunks to a height of 12 to 15 inches from the ground, thoroughly wetting the indicated area. Spray until runoff at the ground line is noticeable. Old or rough bark requires more spray than smooth young bark. Apply anytime, including the winter months, except when snow or water prevent spraying to the ground line. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Low Volume Basal Bark Treatment
To control susceptible woody plants with stems less than 6 inches in basal diameter, mix 20 to 30 gallons of Garlon 4 Ultra in enough oil to make 100 gallons of spray mixture. Apply with a backpack or sprayer using low pressure and a solid cone or flat fan nozzle. Spray the basal parts of brush and tree trunks to a height of 12 to 15 inches from the ground in a manner that thoroughly wets the lower stems, including the root collar area, but not to the point of runoff. Herbicide concentration should vary with size and susceptibility of species treated. Treatments may be applied throughout the year including when snow is present. Efficacy may be reduced when stem surfaces are saturated with water. See Table 1 for relationship between mixing rate, spray volume and maximum application rate. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Garlon 4 Ultra Plus Milestone for basal bark applications
Mix Garlon 4 Ultra with Milestone in a commercially available basal diluent (or other oils or basal diluents as recommended by the manufacturer); the basal oil should be compatible with a water soluble herbicide such as Milestone. Make a stable tank mixture for basal bark application by first combining each product with a compatibility agent prior to final mixing in the desired ratio. If using a tank mix, mix the oil-based products such as Garlon 4 Ultra thoroughly with basal oil and add any other oil-based products before adding the water based products. If the mixture stands for more than 30 minutes, reagitation may be required. Oil and water based mixtures can separate over time. Long-term storage is not recommended without vigorous agitation prior to use or without a recommended compatibility agent.

Garlon 4 Ultra Plus Tordon 22K in Oil Tank Mix: Garlon 4 Ultra and Tordon 22K may be used in tank mix combination as a low volume basal bark treatment to improve control of certain woody species such as ash, elm, maple, poplar, aspen, hackberry, oak, oceanspray, birch, hickory, pine, tanoak, cherry, locust, sassafras, and multiflora rose. (See product bulletin for mixing instructions.) Tordon 22K is not registered for use in the states of California and Florida.

Streamline Basal Bark Treatment (Southern States)
To control or suppress susceptible woody plants for conifer release, mix 20 to 30 gallons of Garlon 4 Ultra in enough oil to make 100 gallons of spray mixture. Streamline basal bark treatments are most effective on stems less than 4 inches in basal diameter. Apply with a backpack sprayer or using equipment that provides a directed straight stream spray. Apply the spray in a 2- to 3-inch wide band to one side of stems less than 3 inches in basal diameter. When the optimum amount of spray mixture is applied, the treated zone should widen to encircle the stem within approximately 30 minutes. Treat both sides of stems which are 3 to 4 inches in basal diameter. Direct the spray at bark that is approximately 12 to 24 inches above ground. Pines (loblolly, slash, shortleaf, and Virginia) up to 2 inches in diameter breast height (dbh) can be controlled by directing the spray at a point approximately 4 feet above ground. Vary spray mixture concentration with size and susceptibility of the species being treated. Better control is achieved when spray is applied to thin juvenile bark and above rough thickened mature bark. This technique is not recommended for scrub and live oak species, including blackjack, turkey, post, live, bluejack and laurel oaks, or bigleaf maple. Apply anytime, including winter months, except when snow or water prevents spraying at the desired height above ground level. **Note:** Best results with some hardwood species occur when applications are made from approximately 6 weeks prior to leaf expansion in the spring until approximately 2 months after leaf expansion is completed. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Low Volume Stem Bark Band Treatment (North Central and Lake States)
The treatment band may be positioned at any height up to the first major branch. For best results apply the band as low as possible. Spray mixture concentration should vary with size and susceptibility of species to be treated. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Thinline Basal Bark Treatment
To control susceptible woody plants with stems less than 6 inches in diameter, apply Garlon 4 Ultra, either undiluted or mixed at 50 to 75% v/v with oil, in a thin stream to all sides of the lower stems. The stream should be directed horizontally to apply a narrow band of Garlon 4 Ultra around each stem or clump. Use a minimum of 2 to 15 milliliters of Garlon 4 Ultra or oil mixture with Garlon 4 Ultra to treat single stems and from 25 to 100 milliliters to treat clumps of stems. Use an applicator metered or calibrated to deliver the small amounts required. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Dormant Stem Treatment
Dormant stem treatments will control susceptible woody plants and vines with stems less than 2 inches in diameter. Plants with stems greater than 2 inches in diameter may not be controlled and resprouting may occur. This treatment method is best suited for sites with dense, small diameter brush. Dormant stem treatments of Garlon 4 Ultra can also be used as a chemical side-trim for controlling lateral branches of larger trees that encroach onto roadside, utility, or other rights-of-way.

High volume and low volume applications using backpacks deliver approximately the same amount of herbicide per acre but differ in delivery volumes to achieve that rate.

High Volume Applications
Mix 4 to 8 quarts of Garlon 4 Ultra in 2 to 3 gallons of crop oil concentrate or other recommended oil and add this mixture to enough water to make 100 gallons of spray solution. Use continuous adequate agitation. Apply using low pressure (20 to 40 psi). In western states, apply anytime after woody plants are dormant and most of the foliage has dropped. In other areas apply anytime within 10 weeks of budbreak, generally February through April. Garlon 4 Ultra may be mixed with 4 quarts of Weedone 170 herbicide to improve the control of black cherry and broaden the spectrum of herbicidal activity. Do not apply to wet or saturated bark as poor control may result.

Low Volume Applications
Mix Garlon 4 Ultra at 4 to 6 gallons and 2 to 3 gallons of crop oil concentrate or other recommended oil and add this mixture to enough water to make 100 gallons of spray solution. Use continuos adequate agitation. Apply with backpack or other low volume spraying equipment, using low pressure (20 to 40 psi). Garlon 4 Ultra may be mixed with other herbicides to broaden the spectrum of herbicidal activity. Do not apply to wet or saturated bark as poor control may result.

Cut Surface
Cut surface applications with Garlon 4 Ultra can be made anytime after cutting up to re-sprouting. After re-sprouting basal bark or foliar applications are more suitable.

Basal Cut Stump Treatment
To control resprouting, mix 20 to 30 gallons of Garlon 4 Ultra in enough oil to make 100 gallons of spray mixture. Apply with a backpack orsprayer using low pressures and a solid cone or flat fan nozzle. Spray the root collar area and any exposed roots of root suckering species, sides of the stump, and the outer portion of the cut surface, including the cambium, until thoroughly wet, but not to the point of runoff. Spray mixture concentration should vary with size and susceptibility of species treated, using the higher rate for larger stumps, stumps with thicker bark or harder to control plants. Apply anytime, including in winter months, except when snow or water prevent spraying to the ground line. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Cut Stump Treatment
To control resprouting of difficult to control species like saltcedar and other *Tamarix* species, bigleaf maple, tanoak, Oregon myrtle, and other susceptible species, apply Garlon 4 Ultra as a 50% dilution v/v in water by spraying all the exposed cambium layer on the freshly cut surface, or use undiluted Garlon 4 Ultra immediately after cutting. Use of undiluted Garlon 4 Ultra is most effective for hard-to-control species. Treatments may be applied throughout the year; however, control may be reduced with treatment during periods of moisture stress as in late summer or

early spring sap flow. Cut stumps so that they are approximately level to facilitate uniform coverage of Garlon 4 Ultra. Use an applicator that can be calibrated to deliver the small amounts of material required.

Forest Management Applications

All application methods described on this label may be used on forest management sites.

For broadcast applications, apply 1 to 6 quarts of Garlon 4 Ultra per acre in a total spray volume of 5 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground. Use spray volumes sufficient to provide thorough coverage of treated foliage. Nozzles or additives that produce larger droplets of spray may require higher spray volumes to provide adequate coverage.

Plant Back Interval for Conifers: Conifers planted sooner than one month after treatment with Garlon 4 Ultra at less than 4 quarts per acre or sooner than two months after treatment at 4 to 6 quarts per acre may be injured. When tank mixtures of herbicides are used for forest site preparation, labels for all products in the mixture should be consulted and the longest recommended waiting period observed.

Forest Site Preparation (Not For Conifer Release)
Southern States Including Alabama, Arkansas, Delaware, Florida, Georgia, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia: To control susceptible woody plants and broadleaf weeds, apply Garlon 4 Ultra at a rate of 4 to 6 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 2 to 4 quarts of Garlon 4 Ultra per acre in tank mix combination with labeled rates of Graslan L or Tordon 22K. Graslan L and Tordon 22K are not registered for use in the state of Florida. Where grass control is also desired, Garlon 4 Ultra, alone or in combination with Tordon 22K or Graslan L, may be applied with labeled rates of other herbicides registered for grass control in forests. Use of tank mix products must be in accordance with the most restrictive of label limitations and precautions. Do not exceed labeled application rates. Garlon 4 Ultra cannot be tank mixed with any product containing a label prohibition against such mixing.

In Western, Northeastern, North Central, and Lake States (States Not Listed Above as Southern States): To control susceptible woody plants and broadleaf weeds, apply Garlon 4 Ultra at a rate of 3 to 6 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 1.5 to 3 quarts per acre of Garlon 4 Ultra in tank mix combination with labeled rates of Graslan L, Tordon 22K, or Freelexx or a 2,4-D low volatile ester or Freelexx. Graslan L and Tordon 22K are not registered for use in the state of California. Where grass control is also desired, Garlon 4 Ultra, alone or in tank mix combination with Graslan L or Tordon 22K, may be applied with labeled rates of other herbicides registered for grass control in forests. When applying tank mixes, follow applicable use directions and precautions on each product label.

Southern Coastal Flatwoods: To control susceptible broadleaf weeds and woody species such as gallberry and wax-myrtle, and for partial control of saw-palmetto, apply 2 to 4 quarts of Garlon 4 Ultra per acre. To broaden the spectrum of species controlled to include fetterbush, staggerbush, titi, and grasses, apply 2 to 3 quarts per acre of Garlon 4 Ultra in tank mix combination with labeled rates of Arsenal Applicator's Concentrate herbicide. Where control of gallberry, wax-myrtle, broadleaf weeds, and grasses is desired, apply 2 to 3 quarts of Garlon 4 Ultra per acre in tank mix combination with labeled rates of Accord Concentrate or Accord SP herbicide.

These treatments may be broadcast during site preparation of flat planted or bedded sites or, on bedded sites, applied in bands over the top of beds. For best results, apply in late summer or fall. Efficacy may not be satisfactory when applications are made in early season prior to August. **Note:** Do not apply after planting pines.

Directed Sprays Applications for Conifer Release
To release conifers from competing hardwoods and brush such as red maple, sugar maple, striped maple, sweetgum, red and white oaks, ash, hickory, alder, birch, aspen, pin cherry, *Ceanothus* spp., blackberry, chinquapin, and poison oak, mix 4 to 20 quarts of Garlon 4 Ultra in enough water to make 100 gallons of spray mixture. This spray mixture should be directed onto foliage of competitive hardwoods using backpack sprayers with flat fan nozzles or equivalent anytime after the hardwoods and brush have reached full leaf size, but before autumn coloration. The majority of treated hardwoods and brush should be less than 6 feet in height to ensure adequate spray coverage. Care should be taken to direct spray solutions away from contact with conifer foliage, particularly foliage of desirable pines. See Table 1 for relationship between mixing rate, spray volume and maximum application rate.

Note: Spray may cause temporary damage and growth suppression where contact with conifers occurs; however, injured conifers should recover and grow normally. Over-the-top spray applications can kill pines.

Broadcast Applications for Mid-Rotation Understory Brush Control in Southern Coastal Flatwoods Pine Stands (Ground Equipment Only)
For control of susceptible species, such as gallberry and wax-myrtle, and broadleaf weeds, apply 2 to 4 quarts of Garlon 4 Ultra per acre. To broaden the spectrum of woody plants controlled to include fetterbush, staggerbush, and titi, apply 2 to 3 quarts of Garlon 4 Ultra per acre in tank mix combination with labeled rates of Arsenal Applicator's Concentrate. Saw-palmetto will be partially controlled by use of Garlon 4 Ultra at 4 quarts per acre or by mixtures of Garlon 4 Ultra at 2 to 3 quarts per acre in tank mix combination with either Arsenal Applicator's Concentrate or Escort herbicide. These mixtures should be broadcast applied over target understory brush species, **but to prevent injury to pines, make applications underneath the foliage of pines.** Apply sprays in 30 gallons or more per acre of total volume. For best results, apply in late summer or fall. Efficacy may not be satisfactory when applications are made in early season prior to August.

Broadcast Applications for Conifer Release in the Pacific Northwest and California
Dormant Conifers Before Bud Swell (Excluding Pines): To control or suppress deciduous hardwoods such as vine maple, bigleaf maple, alder, scotch broom, or willow **before leaf-out**, or evergreen hardwoods such as madrone, chinquapin, and *Ceanothus* spp., use Garlon 4 Ultra at 1 to 2 quarts per acre. Use diesel or fuel oil as a diluent, or use water plus 1 to 2 gallons per acre of diesel oil or a suitable surfactant or oil substitute at manufacturer's recommended rates. **Mixing with oil as the only diluent requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Conifer Plantations (Excluding Pines) After Hardwoods Begin Growth and Before Conifer Bud Break ("Early Foliar" Hardwood Stage): Use Garlon 4 Ultra at 1 to 1.5 quarts alone or with Freelexx or 2,4-D low volatile ester herbicide in water carrier to provide no more than 3 lb ae per acre from both products. After conifer bud break, these sprays may cause more serious injury to the crop trees. Use of a surfactant may cause unacceptable injury to conifers especially after bud break.

Conifer Plantations (Excluding Pines) After Conifers Harden Off In Late Summer and While Hardwoods Are Still Growing Actively: Use Garlon 4 Ultra at rates of 1 to 1.5 quarts per acre alone or with Freelexx or a 2,4-D low volatile ester. Treat as soon after conifer bud hardening as possible so that hardwoods and brush are actively growing. Use of oil, oil substitute, or surfactant may cause unacceptable injury to the conifers.

Broadcast Applications for Conifer Release in the Eastern United States
To release spruce, fir, red pine, and white pine from competing hardwoods such as red maple, sugar maple, striped maple, alder, birch (white, yellow, and grey), aspen, ash, pin cherry, and *Rubus* spp. and perennial and annual broadleaf weeds, use Garlon 4 Ultra at rates of 1.5 to 3 quarts per acre alone or with Freelexx or a 2,4-D amine or low volatile ester. Apply in late summer or early fall after conifers have formed their overwintering buds and hardwoods are in full leaf and prior to autumn coloration.

Broadcast Applications for Conifer Release in the Lake States Region
To release spruce, fir, and red pine from competing hardwoods such as aspen, birch, maple, cherry, willow, oak, hazel, and *Rubus* spp. and perennial and annual broadleaf weeds, use Garlon 4 Ultra at rates of 1.5 to 3 quarts per acre. Apply in late summer or early fall after conifers have formed their overwintering buds and hardwoods are in full leaf and prior to autumn coloration.

Basal Bark and Dormant Stem Treatments

Individual plant treatments such as basal bark and cut surface applications may be used on any use site listed on this label at a maximum use rate of 8 lb ae of triclopyr per acre. See above in the section **Basal Bark, Dormant Stem and Cut Surface Treatments for use on all site** for more use information.

Low Volume Basal Bark Treatment
To control susceptible woody plants such as mesquite, huisache, red maple, red and white oak, birches and aspen with stems less than 6 inches in basal diameter.

Streamline Basal Bark Treatment
To control or suppress susceptible woody plants such as mesquite, huisache, red maple, white and red oak, elbowbush, greenbriar, hackberry, pricklyash, yaupon and wild grape

Cut Stump, Basal Cut Stump, Dormant Stem, Thinline Basal Bark Treatments
To control resprouting, apply undiluted Garlon 4 Ultra to wet the cambium and adjacent wood around the entire circumference of cut stumps. Treatments may be applied throughout the year; however, control may be reduced with treatment during periods of moisture stress as in late summer. Cut stumps so that they are approximately level to facilitate uniform coverage of Garlon 4 Ultra. Use an applicator which can be calibrated to deliver the small amounts of material required.

Growing Point and Leaf Base (Crown) Treatment of Yucca
Prepare a 2% v/v solution of Garlon 4 Ultra in basal oil, diesel or fuel oil (13 fl oz of Garlon 4 Ultra in 5 gallons of spray mixture). Thoroughly wet the center of the plant including growing point and leaf bases to the soil surface. Complete coverage of leaves is not necessary.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. To the extent permitted by law, otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent permitted by law, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Label Code: D02-329-005
Replaced Label: D02-329-004
LOES Number: 010-02127

EPA accepted 02/05/18

Revisions:

1. Updated list of use sites.
2. Updated the Resistance Management. Updated Spray Drift Management.
3. Corrected Active Ingredient statement.
4. Updated Agricultural Use Requirements and Non-Agricultural Use Requirements.
5. Updated PPE and User Safety.
6. Updated and reformatted the Plant Controlled section.
7. Revised and renamed the Application Methods for all use sites to Use Information
8. Added Maximum Use Rates section under Use Restrictions.
9. Updated Grazing and Haying restrictions for consistency with other triclopyr labels.
10. Updated rate for Tank Mixing as a low volume foliar spray from 12 to 9 quarts.
11. Updated title for Basal Bark Treatment to Conventional Basal Bark Treatment.
12. Updated Low Volume Basal Bark Treatment section.
13. Updated Dormant Stem Treatment section.
14. Added section for Rangeland and Permanent Grass Pastures, Basal Bark and Dormant Stem Treatments and CRP.

SAFETY DATA SHEET
DOW AGROSCIENCES LLC

Product name: GARLON™ 4 Ultra Herbicide

Issue Date: 05/04/2015
Print Date: 05/17/2015

DOW AGROSCIENCES LLC encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. IDENTIFICATION

Product name: GARLON™ 4 Ultra Herbicide

Recommended use of the chemical and restrictions on use
Identified uses: End use herbicide product

COMPANY IDENTIFICATION
DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD
INDIANAPOLIS IN 46268-1053
UNITED STATES

Customer Information Number: 800-992-5994
info@dow.com

EMERGENCY TELEPHONE NUMBER
24-Hour Emergency Contact: 800-992-5994
Local Emergency Contact: 352-323-3500

2. HAZARDS IDENTIFICATION

Hazard classification
This material is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.
Skin sensitisation - Sub-category 1B

Label elements
Hazard pictograms

Signal word: **WARNING!**

Hazards
May cause an allergic skin reaction.

Precautionary statements

Prevention
Avoid breathing dust/ fume/ gas/ mist/ vapours/ spray.
Contaminated work clothing should not be allowed out of the workplace.
Wear protective gloves.

Response
IF ON SKIN: Wash with plenty of soap and water.
If skin irritation or rash occurs: Get medical advice/ attention.
Wash contaminated clothing before reuse.

Disposal
Dispose of contents/ container to an approved waste disposal plant.

Other hazards
no data available

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical nature: Mixture
This product is a mixture.

Component	CASRN	Concentration
Triclopyr-2-butoxyethyl ester	64700-56-7	60.5%
Ethylene glycol monobutyl ether	111-76-2	0.5%
Balance	Not available	39.0%

4. FIRST AID MEASURES

Description of first aid measures
General advice: First Aid responders should pay attention to self-protection and use the recommended protective clothing (chemical resistant gloves, splash protection). If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air. If person is not breathing, call an emergency responder or ambulance, then give artificial respiration; if by mouth to mouth use rescuer protection (pocket mask etc). Call a poison control center or doctor for treatment advice.

Skin contact: Take off contaminated clothing. Wash skin with soap and plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Wash clothing before reuse. Shoes and other leather items which cannot be decontaminated should be disposed of properly.

Eye contact: Hold eyes 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 eyes. Call a poison control center or doctor for treatment advice.

Ingestion: 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. Never give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed: Aside from the information found under Description of first aid measures (above) and Indication of immediate medical attention and special treatment needed (below), any additional important symptoms and effects are described in Section 11: Toxicology Information.

Indication of any immediate medical attention and special treatment needed
Notes to physician: No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient. Have the Safety Data Sheet, and if available, the product container or label with you when calling a poison control center or doctor, or going for treatment.

5. FIREFIGHTING MEASURES

Suitable extinguishing media: Water fog or fine spray. Dry chemical fire extinguishers. Carbon dioxide fire extinguishers. Foam. Alcohol resistant foams (ATC type) are preferred. General purpose synthetic foams (including AFFF) or protein foams may function, but will be less effective. Water fog, applied gently may be used as a blanket for fire extinguishment.

Unsuitable extinguishing media: Do not use direct water stream. May spread fire.

Special hazards arising from the substance or mixture
Hazardous combustion products: During a fire, smoke may contain the original material in addition to combustion products of varying composition which may be toxic and/or irritating. Combustion products may include and are not limited to: Nitrogen oxides. Hydrogen chloride. Carbon monoxide. Carbon dioxide. Phosgene.

Unusual Fire and Explosion Hazards: Container may rupture from gas generation in a fire situation. Violent steam generation or eruption may occur upon application of direct water stream to hot liquids.

Advice for firefighters
Fire Fighting Procedures: Keep people away. Isolate fire and deny unnecessary entry. Use water spray to cool fire exposed containers and fire affected zone until fire is out and danger of reignition has passed. Fight fire from protected location or safe distance. Consider the use of unmanned hose holders or monitor nozzles. Immediately withdraw all personnel from the area in case of rising sound from venting safety device or discoloration of the container. Do not use direct water stream. May spread fire. Move container from fire area if this is possible without hazard. Burning liquids may be moved by flushing with water to protect personnel and minimize property damage. Water fog, applied gently may be used as a blanket for fire extinguishment. Contain fire water run-off if possible. Fire water run-off, if not contained, may cause environmental damage. Review the “Accidental Release Measures” and the “Ecological Information” sections of this (M)SDS.

Special protective equipment for firefighters: Wear positive-pressure self-contained breathing apparatus (SCBA) and protective fire fighting clothing (includes fire fighting helmet, coat, trousers, boots, and gloves). Avoid contact with this material during fire fighting operations. If contact is likely, change to full chemical resistant fire fighting clothing with self-contained breathing apparatus. If this is

not available, wear full chemical resistant clothing with self-contained breathing apparatus and fight fire from a remote location. For protective equipment in post-fire or non-fire clean-up situations, refer to the relevant sections.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures: Isolate area. Keep unnecessary and unprotected personnel from entering the area. Refer to section 7, Handling, for additional precautionary measures. Use appropriate safety equipment. For additional information, refer to Section 8, Exposure Controls and Personal Protection.

Environmental precautions: Prevent from entering into soil, ditches, sewers, waterways and/or groundwater. See Section 12, Ecological Information.

Methods and materials for containment and cleaning up: Contain spilled material if possible. Small spills: Absorb with materials such as: Clay. Dirt. Sand. Sweep up. Collect in suitable and properly labeled containers. Large spills: Contact Dow AgroSciences for clean-up assistance. See Section 13, Disposal Considerations, for additional information.

7. HANDLING AND STORAGE

Precautions for safe handling: Keep out of reach of children. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin, and clothing. Use with adequate ventilation. Wash thoroughly after handling. See Section 8, EXPOSURE CONTROLS AND PERSONAL PROTECTION.

Conditions for safe storage: Store in a dry place. Store in original container. Keep container tightly closed when not in use. Do not store near food, foodstuffs, drugs or potable water supplies.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters
Exposure limits are listed below, if they exist.

Component	Regulation	Type of listing	Value/Notation
Triclopyr-2-butoxyethyl ester	Dow IHG	TWA	2 mg/m3
	Dow IHG	TWA	SKIN, DSEN, BEI
Ethylene glycol monobutyl ether	ACGIH	TWA	20 ppm
	OSHA Z-1	TWA	240 mg/m3 50 ppm
	ACGIH	TWA	BEI
	OSHA Z-1	TWA	Absorbed via skin

RECOMMENDATIONS IN THIS SECTION ARE FOR MANUFACTURING, COMMERCIAL BLENDING AND PACKAGING WORKERS. APPLICATORS AND HANDLERS SHOULD SEE THE PRODUCT LABEL FOR PROPER PERSONAL PROTECTIVE EQUIPMENT AND CLOTHING.

Exposure controls
Engineering controls: Use local exhaust ventilation, or other engineering controls to maintain airborne levels below exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, general ventilation should be sufficient for most operations.

Individual protection measures

Eye/face protection: Use safety glasses (with side shields).

Skin protection

Hand protection: Use gloves chemically resistant to this material. Examples of preferred glove barrier materials include: Butyl rubber. Chlorinated polyethylene. Neoprene. Polyethylene. Ethyl vinyl alcohol laminate ("EVAL"). Examples of acceptable glove barrier materials include: Natural rubber ("latex"). Viton. Polyvinyl chloride ("PVC" or "vinyl"). Nitrile/butadiene rubber ("nitrile" or "NBR"). NOTICE: The selection of a specific glove for a particular application and duration of use in a workplace should also take into account all relevant workplace factors such as, but not limited to: Other chemicals which may be handled, physical requirements (cut/puncture protection, dexterity, thermal protection), potential body reactions to glove materials, as well as the instructions/specifications provided by the glove supplier.

Other protection: Use protective clothing chemically resistant to this material. Selection of specific items such as face shield, boots, apron, or full body suit will depend on the task.

Respiratory protection: Respiratory protection should be worn when there is a potential to exceed the exposure limit requirements or guidelines. If there are no applicable exposure limit requirements or guidelines, wear respiratory protection when adverse effects, such as respiratory irritation or discomfort have been experienced, or where indicated by your risk assessment process. For most conditions no respiratory protection should be needed; however, if discomfort is experienced, use an approved air-purifying respirator.
The following should be effective types of air-purifying respirators: Organic vapor cartridge with a particulate pre-filter.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	
Physical state	Liquid.
Color	Yellow
Odor	Mild
Odor Threshold	no data available
pH	3.36 1% *pH Electrode* (1% aqueous suspension)
Melting point/range	Not applicable
Freezing point	No test data available
Boiling point (760 mmHg)	No test data available
Flash point	**closed cup** > 100 °C (> 212 °F) *Pensky-Martens Closed Cup ASTM D 93*
Evaporation Rate (Butyl Acetate = 1)	No test data available
Flammability (solid, gas)	no data available
Lower explosion limit	No test data available
Upper explosion limit	No test data available
Vapor Pressure	No test data available
Relative Vapor Density (air = 1)	No test data available
Relative Density (water = 1)	1.11 at 20 °C (68 °F) *Digital Density Meter (Oscillating Coil)*
Water solubility	emulsifies

Partition coefficient: n-octanol/water	no data available
Auto-ignition temperature	> 325 °C (> 617 °F)
Decomposition temperature	No test data available
Dynamic Viscosity	23.4 mPa.s at 20 °C (68 °F) 10.8 mPa.s at 40 °C (104 °F)
Kinematic Viscosity	No test data available
Explosive properties	No
Oxidizing properties	No significant increase (>5C) in temperature.
Liquid Density	1.11 g/cm3 at 20 °C (68 °F) *Digital density meter*
Molecular weight	no data available

NOTE: The physical data presented above are typical values and should not be construed as a specification.

10. STABILITY AND REACTIVITY

Reactivity: no data available

Chemical stability: Thermally stable at typical use temperatures.

Possibility of hazardous reactions: Polymerization will not occur.

Conditions to avoid: Exposure to elevated temperatures can cause product to decompose. Generation of gas during decomposition can cause pressure in closed systems.

Incompatible materials: Avoid contact with: Strong acids. Strong bases. Strong oxidizers.

Hazardous decomposition products: Decomposition products depend upon temperature, air supply and the presence of other materials. Decomposition products can include and are not limited to: Hydrogen chloride. Nitrogen oxides. Phosgene.

11. TOXICOLOGICAL INFORMATION

Toxicological information on this product or its components appear in this section when such data is available.

Acute toxicity

Acute oral toxicity
Low toxicity if swallowed. Small amounts swallowed incidentally as a result of normal handling operations are not likely to cause injury; however, swallowing larger amounts may cause injury.

LD50, Rat, female, 3,200 mg/kg

Acute dermal toxicity
Prolonged skin contact is unlikely to result in absorption of harmful amounts.

LD50, Rat, male and female, > 5,000 mg/kg

Acute inhalation toxicity
Prolonged exposure is not expected to cause adverse effects. Based on the available data, respiratory irritation was not observed.

LC50, Rat, male and female, 4 Hour, dust/mist, > 5.05 mg/l No deaths occurred at this concentration.

Skin corrosion/irritation
Brief contact may cause moderate skin irritation with local redness.
May cause drying and flaking of the skin.

Serious eye damage/eye irritation
May cause slight eye irritation.
Corneal injury is unlikely.

Sensitization
Has demonstrated the potential for contact allergy in mice.

For respiratory sensitization:
No relevant data found.

Specific Target Organ Systemic Toxicity (Single Exposure)
Evaluation of available data suggests that this material is not an STOT-SE toxicant.

Specific Target Organ Systemic Toxicity (Repeated Exposure)
For the active ingredient(s):
In animals, effects have been reported on the following organs:
Kidney.
Liver.

Carcinogenicity
For the minor component(s): In long-term animal studies with ethylene glycol butyl ether, small but statistically significant increases in tumors were observed in mice but not rats. The effects are not believed to be relevant to humans. If the material is handled in accordance with proper industrial handling procedures, exposures should not pose a carcinogenic risk to man. For similar active ingredient(s). Triclopyr. Did not cause cancer in laboratory animals.

Teratogenicity
For the active ingredient(s): Has been toxic to the fetus in laboratory animals at doses toxic to the mother. Did not cause birth defects in laboratory animals.

Reproductive toxicity
For similar active ingredient(s). Triclopyr. In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals.

Mutagenicity
For the active ingredient(s): In vitro genetic toxicity studies were negative. Animal genetic toxicity studies were negative.

Aspiration Hazard
Based on available information, aspiration hazard could not be determined.

Carcinogenicity

Component	List	Classification
Ethylene glycol monobutyl ether	ACGIH	A3: Confirmed animal carcinogen with unknown relevance to humans.

12. ECOLOGICAL INFORMATION

Ecotoxicological information on this product or its components appear in this section when such data is available.

Toxicity

Acute toxicity to fish
For similar material(s):
Material is highly toxic to aquatic organisms on an acute basis (LC50/EC50 between 0.1 and 1 mg/L in the most sensitive species tested).

For similar material(s):
LC50, Lepomis macrochirus (Bluegill sunfish), 96 Hour, 0.44 mg/l, OECD Test Guideline 203 or Equivalent

LC50, Oncorhynchus mykiss (rainbow trout), 96 Hour, 0.984 mg/l, OECD Test Guideline 203 or Equivalent

Acute toxicity to aquatic invertebrates
For similar material(s):
EC50, Daphnia magna (Water flea), 48 Hour, 0.35 mg/l, OECD Test Guideline 202 or Equivalent

Acute toxicity to algae/aquatic plants
For similar material(s):
EbC50, Pseudokirchneriella subcapitata (green algae), 72 Hour, Biomass, 11 mg/l, OECD Test Guideline 201 or Equivalent

Toxicity to Above Ground Organisms
Based on information for a similar material:
Material is slightly toxic to birds on an acute basis (LD50 between 501 and 2000 mg/kg).

Based on information for a similar material:

oral LD50, Colinus virginianus (Bobwhite quail), 1,350 mg/kg

Persistence and degradability

Triclopyr-2-butoxyethyl ester
Biodegradability: Chemical degradation (hydrolysis) is expected in the environment.
Material is expected to biodegrade very slowly (in the environment). Fails to pass OECD/EEC tests for ready biodegradability.
10-day Window: Fail
Biodegradation: 18 %
Exposure time: 28 d

Method: OECD Test Guideline 301B or Equivalent

Theoretical Oxygen Demand: 1.39 mg/mg

Biological oxygen demand (BOD)

Incubation Time	BOD
	0.004 mg/mg

Stability in Water (1/2-life)
Hydrolysis, half-life, 8.7 d, pH 7, Half-life Temperature 25 °C

Photodegradation
Atmospheric half-life: 5.6 Hour
Method: Estimated.

Ethylene glycol monobutyl ether

Biodegradability: Material is readily biodegradable. Passes OECD test(s) for ready biodegradability. Material is ultimately biodegradable (reaches > 70% mineralization in OECD test(s) for inherent biodegradability).
10-day Window: Pass
Biodegradation: 90.4 %
Exposure time: 28 d
Method: OECD Test Guideline 301B or Equivalent

Theoretical Oxygen Demand: 2.30 mg/mg

Chemical Oxygen Demand: 2.21 mg/g Dichromate

Biological oxygen demand (BOD)

Incubation Time	BOD
5 d	5.2 %
10 d	57 %
20 d	72.2 %

Balance

Biodegradability: No relevant data found.

Bioaccumulative potential

Triclopyr-2-butoxyethyl ester

Bioaccumulation: Bioconcentration potential is moderate (BCF between 100 and 3000 or Log Pow between 3 and 5).
Partition coefficient: n-octanol/water(log Pow): 4.62
Bioconcentration factor (BCF): 110 Fish.

Ethylene glycol monobutyl ether

Bioaccumulation: Bioconcentration potential is low (BCF < 100 or Log Pow < 3).
Partition coefficient: n-octanol/water(log Pow): 0.81 Measured
Bioconcentration factor (BCF): 3.2

Balance
Bioaccumulation: No relevant data found.

Mobility in soil

Triclopyr-2-butoxyethyl ester
Calculation of meaningful sorption data was not possible due to very rapid degradation in the soil.
For the degradation product:
Triclopyr.
Potential for mobility in soil is very high (Koc between 0 and 50).

Ethylene glycol monobutyl ether
Potential for mobility in soil is high (Koc between 50 and 150).
Partition coefficient(Koc): 67 Estimated.

Balance
No relevant data found.

13. DISPOSAL CONSIDERATIONS

Disposal methods: If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities. This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations. If the material as supplied becomes a waste, follow all applicable regional, national and local laws.

14. TRANSPORT INFORMATION

DOT

Not regulated for transport

Classification for SEA transport (IMO-IMDG):

Proper shipping name	ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S.(Triclopyr-2-butoxyethyl ester)
UN number	UN 3082
Class	9
Packing group	III
Marine pollutant	Triclopyr-2-butoxyethyl ester
Transport in bulk according to Annex I or II of MARPOL 73/78 and the	Consult IMO regulations before transporting ocean bulk

IBC or IGC Code

Classification for AIR transport (IATA/ICAO):

Proper shipping name	Environmentally hazardous substance, liquid, n.o.s.(Triclopyr-2-butoxyethyl ester)
UN number	UN 3082
Class	9
Packing group	III

This information is not intended to convey all specific regulatory or operational requirements/information relating to this product. Transportation classifications may vary by container volume and may be influenced by regional or country variations in regulations. Additional transportation system information can be obtained through an authorized sales or customer service representative. It is the responsibility of the transporting organization to follow all applicable laws, regulations and rules relating to the transportation of the material.

15. REGULATORY INFORMATION

OSHA Hazard Communication Standard
This product is a “Hazardous Chemical” as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Sections 311 and 312
Acute Health Hazard
Chronic Health Hazard

Superfund Amendments and Reauthorization Act of 1986 Title III (Emergency Planning and Community Right-to-Know Act of 1986) Section 313
This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)
This product contains no listed substances known to the State of California to cause cancer, birth defects or other reproductive harm, at levels which would require a warning under the statute.

Pennsylvania (Worker and Community Right-To-KnowAct): Pennsylvania Hazardous Substances List and/or Pennsylvania Environmental Hazardous Substance List:
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

Pennsylvania (Worker and Community Right-To-KnowAct): Pennsylvania Special Hazardous Substances List:
To the best of our knowledge, this product does not contain chemicals at levels which require reporting under this statute.

United States TSCA Inventory (TSCA)

This product contains chemical substance(s) exempt from U.S. EPA TSCA Inventory requirements. It is regulated as a pesticide subject to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements.

Federal Insecticide, Fungicide and Rodenticide Act
EPA Registration Number: 62719-527
This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

CAUTION

Causes moderate eye irritation
Harmful if swallowed
Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

16. OTHER INFORMATION

Hazard Rating System
NFPA

Health	Fire	Reactivity
2	1	0

Revision
Identification Number: 101188950 / A211 / Issue Date: 05/04/2015 / Version: 7.0
DAS Code: GF-1529
Most recent revision(s) are noted by the bold, double bars in left-hand margin throughout this document.

Legend

Absorbed via skin	Absorbed via skin
ACGIH	USA. ACGIH Threshold Limit Values (TLV)
BEI	Biological Exposure Indices
Dow IHG	Dow Industrial Hygiene Guideline
OSHA Z-1	USA. Occupational Exposure Limits (OSHA) - Table Z-1 Limits for Air Contaminants
SKIN, DSEN, BEI	Absorbed via Skin, Skin Sensitizer, Biological Exposure Indice
TWA	8-hour, time-weighted average

Information Source and References
This SDS is prepared by Product Regulatory Services and Hazard Communications Groups from information supplied by internal references within our company.

DOW AGROSCIENCES LLC urges each customer or recipient of this (M)SDS to study it carefully and consult appropriate expertise, as necessary or appropriate, to become aware of and understand the data contained in this (M)SDS and any hazards associated with the product. The information herein is provided in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ

between various locations. It is the buyer's/user's responsibility to ensure that his activities comply with all federal, state, provincial or local laws. The information presented here pertains only to the product as shipped. Since conditions for use of the product are not under the control of the manufacturer, it is the buyer's/user's duty to determine the conditions necessary for the safe use of this product. Due to the proliferation of sources for information such as manufacturer-specific (M)SDSs, we are not and cannot be responsible for (M)SDSs obtained from any source other than ourselves. If you have obtained an (M)SDS from another source or if you are not sure that the (M)SDS you have is current, please contact us for the most current version.

APPENDIX 9

Herbicide Fact Sheets

THE COMMONWEALTH OF MASSACHUSETTS
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FOSAMINE AMMONIUM

Common Trade Name: Krenite, Krenite UT

Chemical Name: Ammonium ethyl carbamoylphosphate

CAS No.: 25954—13—6

GENERAL INFORMATION

Fosamine ammonium is usually applied to plants in the late summer and early fall. It is systemically absorbed by buds, stems and foliage. In most plants, effects of herbicide treatment are not evident until the following spring when buds fail to develop, or develop into miniature spindly leaves that do not provide adequate photosynthesis. The plant consequently dies. Although it is translocated within plants, effective treatment requires the complete coverage of all parts of woody plants. In some species of non-deciduous plants, such as pines and bindweed, leaves may turn brown immediately after application.

ENVIRONMENTAL FATE

Mobility

Fosamine ammonium is a low mobility herbicide and is not readily leached from soil. Soil adsorption coefficients (Kd) for Fosamine ammonium are reported as ranging from 0.22 (low organic sandy barns) to 350 (silt barns) (103). The organic matter adsorption coefficients are more variable and range from 20 to 62, with one adsorption coefficient reported at 7400 (103). There does not appear to be a good correlation between the soil adsorption coefficents and organic matter, clay or silt content of the soil.

In a study using soil thin layer plates to assess mobility, the Rf values (ratio of the compound mobility versus the leading edge of the water movement) for Fosamine ammonium ranged from 0.92 to 0.98 on the four soils tested (103). These Rf values indicate a high mobility pesticide, in contrast to the soil adsorption coefficients and leaching studies which indicate low mobility. This information may reflect the solubility of fosamine ammonium and not its mobility characteristics.

Fosamine arnmonium is strongly adsorbed to soil particles and it is not carried away in precipitation, in spite of its high water solubility. In a laboratory study using inclined soil flats (Fallingston sandy loam), Fosamine ammonium was applied at the rate of 15 lbs a.i/acre followed by simulated rainfall. The Fosamine ammonium remained near the surface of the soil and in the upper part of the flat, thus indicating no appreciable downward or lateral mobility (105). Field studies conducted in Florida, Delaware and Illinois have confirmed the laboratory results and indicate very little or no downward movement in soil of the herbicide or its degradation products (15, 104, 105).

Field studies indicate that Fosamine ammonium has low vertical mobility but, soils with higher adsorption capacities will tend to retard movement more than soil with lower adsorption capacities (15). However, Fosamine ammonium may move with the soil during erosion (14). Due to strong adsorption of fosamine ammonium to soil particles, there is little tendency for ground water contamination or for surface waters to become contaminated

without direct application of the material (14, 15).

In the field studies, the Delaware soil (Keyport silt loam) was the most representative soil of Massachusetts conditions. However, the Fallsington sandy loam which was used in the greenhouse studies represents a close approximation to Massachusetts soils. In these studies Fosamine ammonium exhibited slight tendency to leach in both those soils. Consequently, it is expected that fosamine ammonium will exhibit slight leaching in Massachusetts soils.

Persistence

The major route of Fosamine ammonium degradation is metabolism by soil microorganisms. Fosamine ammonium is stable to degradation by hydrolysis at pH values 5, 7, and 9; it is also stable to photodegradation (10, 14, 101, 102).

Fosamine ammonium is not considered a persistent compound in soils. Under field conditions in Florida, Delaware and Illinois, the half-life of Fosamine ammonium in soils was approximately one week following the application of 10 lbs/acre (104).

In the field, the metabolite carbamoylphosphonic acid (CPA) was found several days after initial soil treatment. All Fosamine ammonium and CPA had disappeared completely by 3 to 6 months (14, 15).

Greenhouse soil studies indicate a half-life of about 10 days, which is in close agreement with the field study half—life (15,104). In the field, Fosamine ammonium was metabolized to CPA more quickly in fine sand than in two silt barns (14, 104).

There is little persistence information in the literature for Fosamine ammonium and the only reported field degradation rates are from one study. This might be a cause for concern were it not for the close agreement in soil half-lives reported, not withstanding the varied location and soils used in the field stu-dies. Moreover, the greenhouse degradation study was also in close agreement with the reported field half-life.

It is assumed that the half-lives reported in the previous study have been obtained in spring to summer conditions, since they were not stated. The degradation of fosamine ammonium was investigated for a one year period in the previous study but, because of the short half-life complete degradation had occurred before the winter. It is expected that fosamine ammonium will be applied in summer or fall only since it must be applied to full foliage for control. Consequently, the lack of winter degradation rates is not a major concern.

With most herbicides soil characteristics and local climatic factors have a pronounced effect on soil half—life. This study suggest that degradation of Fosamine ammonium by soil microorganisms is not influenced by soil characteristics or local climate to any appreciable extent.

Due to the similar persistence of Fosamine ammonium in all locations and soils there is no most representative location. In this case, all sites represent expected persistence. Therefore, the half-life of Fosamine ammonium under Massachusetts condition is expected to be approximately one week.

TOXICITY REVIEW

Acute (Mammalian)

The oral LD5Os have been determined for both the formulated product and the formulated product plus surfactant (41.1 to 42% active ingredient (ai) in both cases). The LD5Os in the male rat were 24,400 mg (ai) (formulated product)/kg and 7,295 mg (ai) (formulated product with surfactant)/kg. Female rats had an LD50 of 5,000 (ai) mg (formulated product with surfactant)/kg. The formulated product has an LD50 of 7,380 mg(ai)/kg (formulated product) in male guinea pigs (107).

Fosamine ammonium was tested in an acute dermal study. 10 ml of the formulated product at a dose of 1,683 mg(ai)/kg resulted in no mortalities and no clinical signs of toxicity (107). The formulation plus surfactant was tested in rabbits and was not a primary eye irritant. There was mild transient erythema in tested skin. No sensitization was found in Guinea pigs (107).

The formulation plus surfactant (0.1 ml) produced transient mild corneal opacity and transient conjunctual irritation. The formulation without the surfactant was not an irritant (107).

Metabolism

The metabolism of Fosamine ammonium in the rat is rapid with 86% in feces and 11% in urine after 48 hrs (103,15). Compounds identified in the feces included 14C radiolabelled fosamine ammonium (86%) and 14C Carbamoylphosphonic Acid (CPA) diammonium salt (14%). The compnunds identified in the urine were also fosamine ammonium and CPA (103).

Subchronic and chronic feeding studies have been performed using several species, for various time periods.

The No Observable Effect Level (NOEL) for Fosamine Ammonium in diet studies for rats (90 day), dog (6 month), and sheep (90 day) were: 5,000/10,000 ppm, (286/572 mg/kg); 1,000 ppm (40 mg/kg) and 2,000/2,500 ppm highest dose tested (HDT) respectively (107). In the feeding studies the dose was increased after a certain time point when effects were not observed at the lower dose. These dose groups are written first dose/increased dose. In the six month dog study, the female dogs receiving 5000/7500/10000 ppm had increased stomach weights (107).

Oncogenicity Studies

Long term carcinogenicity studies are not available. These studies have not been required by EPA as there are no food uses proposed for Krenite.

Mutagenicity Studies

Mutagenicity testing has been done using Fosamine Ammonium formulated product. It was negative in 5 strains of the Ames assay, and negative both with and without activation in Chinese Hamster ovary point mutation assay. Chromosome damage was produced in the in vitro cytogenetic assay using Chinese Hamster ovary cells at 1.6% and 3.2 formulation (nonactivated) and 1.4, 2.8 and 5.7% formulation (activated) (107). There were no compound related increases in chromosomal aberrations in an in vivo bone marrow study and no changes in unscheduled DNA synthesis in rat hepatocytes (107).

Developmental Studies

The developmental studies that have been performed using fosamine ammonium include a one generation/two litter rat study and a rat oral teratogenicity study. The doses in the 90 day reproduction study were 0, 200, 1,000 and 5,000/10,000 ppm (0, 11, 57 and 285/570 mg/kg/d). There were no effects observed on reproduction and lactation in the reproduction study (NOEL = 5,000/10,000 ppm HOT). The doses in the teratogenicity study were 0, 200, 1,000 and 5,000/10,000 ppm (0, 11, 57 and 285/570 mg/kg/d). There were no effects observed on teratogenicity and fetoxicity at the 1,000 ppm dose level(107).

(a) In these discussions the assumptions made for conversion of ppm (diet) to mg/kg/D were:
Species Body weight (kg) Intake (kg)
Rat 0.35 0.020 Mouse 0.03 0.004 Dog 10 0.4

Avian

Unformulated Fosamine ammonium was administered to Mallard ducks and bobwhite quail by intubation in acute toxicity studies. Five birds per species-sex group received doses of 0, 312.5, 625, 1,250, 2,500, and 5,000 mg/kg. The LD50 was greater than 5,000 mg/kg in both the ducks and quail (15, 107).

Ducks and quail were also used in subacute dietary studies at doses of 0, 625, 1,250, 2,500, 5,000 and 10,000 ppm in the diet for 5 days. Basal diet was given for the last three days of the 8 day exposure. The 8 day LC50 in the diet was greater than 10,000 ppm. There was no increase in duck mortality: food consumption was depressed but body weight gain was normal. There was variable quail mortality and food consumption and body weight were decreased as compared with control (15, 107).

Invertebrates:

Fosamine ammonium toxicity has been determined for only a very few microorganisms and invertebrates. The available studies indicate that Fosamine ammonium has a very low acute toxicity to those organisms tested (15):

Fosamine ammonium salt (42% formulation): 48 hr LC5Os range from 1,524 mg/L for Daphnia to 10,000 mg/L for bees sprayed with the herbicide.

Aquatic Species (fish):

Fosamine ammonium has a very low toxicity to those fish species tested.
Fosamine ammonium salt (42% formulation): 96 hr LC5Os range from 670 mg/L for bluegill sunfish to 8,290 mg/L for coho salmon (15).

Except for the LC5O of 670 mg/L for the bluegill sunfish, reported adult fish LC5Os are all in excess of 1000 mg/L. (15) The yolk-sac fry stage in salmonids was the most sensitive to Fosamine ammonium.

Threshold-effect concentrations of Krenite for salmonids in partial life-cycle studies are less than 75 times the maximum theoretical concentration of Krenite that would be found in shallow waters due to direct overhead spray application (15).

SUMMARY

Fosamine ammonium is not persistent in the environment and is a low mobility herbicide in soil. Fosamine ammonium has a low potential to leach to groundwater or to reach surface waters from surface runoff. With acute oral LD5Os in rats of greater than 5,000 mg/kg, Fosamine ammonium is considered to be of low acute and subchronic mammalian toxicity. Subchronic exposures to Fosamine ammonium resulted in NOELS of greater than 1,000 ppm in a 6 month dog study. Mutagenicity test were negative in all but one case and there are no carcinogenicity data for this active ingredient. Fosamine ammonium is also considered to have very low aquatic and invertebrate acute toxicity.

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GLYPHOSATE

In addition to the review that is presented below, a comprehensive review available from USDA Forest Service provides information that incorporates more recent studies and data. The US Forest Service risk assessment report is available at: http://www.fs.fed.us/foresthealth/pesticide/risk.shtml

Review conducted by MDAR and MassDEP for use in Sensitive Areas of Rights-of-Way in Massachusetts

Common Trade Name(s): Roundup, Glyphosate VMF Round Up Pro, Rodeo, Accord, Accord Concentrate,

Chemical Name: N—(phosphonomethyl)glycine—isopropylamine salt
CAS No.: 1071-83-6

GENERAL INFORMATION
Glyphosate, n-phosphonomethyl glycine, is a systemic, broad spectrum herbicide effective against most plant species, including deep rooted perennial species, annual and biennial species of grasses, sedges, and broadleafed weeds. The major pathway for uptake in plants is through the foliage, however, some root uptake may occur. The presence of surfactants and humidity increases the rate of absorption of glyphosate by plants (15).

Foliarly applied glyphosate is readily absorbed and translocated from treated areas to untreated shoot regions. The mechanism of herbicidal action for glyphosate is believed to be inhibition of amino acid biosynthesis resulting in a reduction of protein synthesis and inhibition of growth (10, 15, 101).

Glyphosate is generally formulated as the isopropylamine salt in aqueous solution (122). Of the three products containing glyphosate considered here, Roundup is sold with a surfactant and Rodeo and Accord are mixed with surfactants prior to use (15). Glyphosate has been reviewed by US Forest Service (15), FAO (122), and EPA 00W (51).

ENVIRONMENTAL FATE

Mobility
Glyphosate is relatively immobile in most soil environments as a result of its strong adsorption to soil particles. Adsorption to soil particles and organic matter begins almost immediately after application. Binding occurs with particular rapidity to clays and organic matter (l5). Clays and organic matter saturated with iron and aluminum (such as in the Northeast) tend to absorb more glyphosate than those saturated with sodium or calcium. The soil phosphate level is the main determinant of the amount of glyphosate adsorbed to soil particles. Soils which are low in phosphates will adsorb higher levels of glyphosate (14, 15).

Glyphosate is classified as immobile by the Helling and Turner classification system. In soil column leaching studies using aged (1 month) Glyphosate, leaching of glyphosate was said to be insignificant after 0.5 inches of water per day for 45 days (14).

Persistence

It has been reported that glyphosate dissipates relatively rapidly when applied to most soils (14). However, studies indicate that the soil half-life is variable and dependent upon soil factors. The half-life of glyphosate in greenhouse studies when applied to silty clay loam, silt loam, and sandy loam at rates of 4 and 8 ppm was 3, 27 and 130 days respectively, independent of application rate (14). An average half-life of 2 months has been reported in field studies for 11 soils (15).

Glyphosate is mainly degraded biologically by soil micro-organisms and has a minimal effect on soil microflora (15). In the soil environment, glyphosate is resistant to chemical degradation such as hydrolysis and is stable to sunlight (15). The primary metabolite of glyphosate is aminomethyl phosphonic acid (AMPA) which has a slower degradation rate than glyphosate (15). The persistence of AMPA is reported to be longer than glyphosate, possibly due to tighter binding to soil (14). No data are available on the toxicity of this compound.

Glyphosate degradation by microorganisms has been widely tested in a variety of field and laboratory studies. Soil characteristics used in these studies have included organic contents, soil types and pHs similar to those that occur in Massachusetts (117).

Glyphosate degradation rates vary considerably across a wide variety of soil types. The rate of degradation is correlated with microbial activity of the soils and does not appear to be largely dependent on soil pH or organic content (117). While degradation rates are likely temperature dependent, most reviews of studies do not report or discuss the dependence of degradation rate on temperature. Mueller et al. (1981 cited in 117) noted that glyphosate degraded in Finnish agricultural soils (loam and fine silt soils) over the winter months; a fact which indicates that degradation would likely take place in similar soils in the cool Massachusetts climate. Glyphosate halflives for laboratory experiments on sandy loam and loamy sand, which are common in Massachusetts, range up to 175 days (117). The generalizations noted for the body of available results are sufficiently robust to incorporate conditions and results applicable to glyphosate use in Massachusetts.

TOXICITY REVIEW

Acute (Mammalian)

Glyphosate has reported oral LD5Os of 4,320 and 5,600 mg/kg in male and female rats (15,4). The oral LD5Os of the two major glyphosate products Rodeo and Roundup are 5,000 and 5,400 mg/kg in the rat (15).

A dermal LD5O of 7,940 mg/kg has been determined in rabbits (15,4). There are reports of mild dermal irritation in rabbits (6), moderate eye irritation in rabbits (7), and possible phototoxicity in humans (9). The product involved in the phototoxicity study was Tumbleweed marketed by Murphys Limited UK (9). Maibach (1986) investigated the irritant and the photo irritant responses in individuals exposed to Roundup (41% glyphosate, water, and surfactant); Pinesol liquid, Johnson Baby Shampoo, and Ivory Liquid dishwashing detergent. The conclusion drawn was that glyphosate has less irritant potential than the Pinesol or the Ivory dishwashing liquid (120).

Metabolism

Elimination of glyphosate is rapid and very little of the material is metabolized (6,106).

Subchronic/Chronic Studies (Mammalian)

In subchronic tests, glyphosate was administered in the diet to dogs and rats at 200, 600, and 2,000 ppm for 90 days. A variety of toxicological endpoints were evaluated with no significant abnormalities reported (15,10).

In other subchronic tests, rats received 0, 1,000, 5,000, or 20,000 ppm (57, 286, 1143 mg/kg) in the diet for 3 months. The no observable adverse effect level (NOAEL) was 20,000 ppm (1,143 mg/kg) (115). In the one year oral dog study, dogs received 20, 100, and 500 mg/kg/day. The no observable effect level (NOEL) was 500 mg/kg (116).

Oncogenicity Studies
Several chronic carcinogenicity studies have been reported for glyphosate including an 18 month, mouse study; and a two year rat study. In the rat study, the animals received 0, 30, 100 or 300 ppm in their diet for 2 years. EPA has determined that the doses in the rat study do not reach the maximum tolerated dose (112) and replacement studies are underway with a high dose of 20,000 ppm (123). The mice received 1000, 5000 or 30,000 ppm for 18 months in their diets. These studies were non-positive (112,109). There was a non-statistically significant increase in a rare renal tumor (renal tubular adenoma (benign) in male mice (109). The rat chronic study needs to be redone with a high dose to fill a partial data gap (112). The EPA weight of evidence classification would be D: not classified (51).

Mutagenicity Testing
Glyphosate has been tested in many short term mutagenicity tests. These include 7 bacterial (including Salmonella typhimurim and B. subtilis) and 1 yeast strain Sacchomyces cerevisiae as well as a mouse dominant lethal test and sister chromatid exchange. The microbial tests were negative up to 2,000 mg/plate (15), as were the mouse dominant lethal and the Chinese hamster ovary cell tests. EPA considers the mutagenicity requirements for glyphosate to be complete in the Guidance for the Registration of Pesticide Products containing glyphosate (112).

The developmental studies that have been done using glyphosate include teratogenicity studies in the rat and rabbit, three generation reproduction studies in the rat, and a reproduction study in the deer mouse. (15)

Rats were exposed to levels of up to 3,500 mg/kg/d in one rat teratology study. There were no teratogenic effects at 3,500 mg/kg/d and the fetotoxicity NOEL was 1,000 mg/kg/d. In the rabbit study a fetotoxicity NOEL was determined at 175 mg/kg/d and no teratogenic effects were observed at 10 or 30 mg/kg/d in one study and 350 mg/kg/d in the other study (15). No effects were observed in the deer mouse collected from conifer forest sprayed at 2 lbs active ingredient per acre (15).

Tolerances & Guidelines
EPA has established tolerances for glyphosate residues in at least 75 agricultural products ranging from 0.1 ppm (most vegetables) to 200 ppm for animal feed commodities such as alfalfa (8).

U.S. EPA Office of Drinking Water has released draft Health Advisories for Glyphosate of 17.50 mg/L (ten day) and 0.70 mg/L (Lifetime)(51).

Avian
Two types of avian toxicity studies have been done with glyphosate: ingestion in adults and exposure of the eggs. The species used in the ingestion studies were the mallard duck, bobwhite quail, and the adult hen (chickens). The 8 day feeding LC5Os in the mallard and bobwhite are both greater than 4,640 ppm. In the hen study, 1,250 mg/kg was administered twice daily for 3 days resulting in a total dose of 15,000 mg/kg. No behavioral or microscopic changes were observed (15).

Invertebrates
A variety of invertebrates (mostly arthropods) and microorganisms from freshwater, marine, and terrestrial ecosystems have been studied for acute toxic effects of technical glyphosate as well as formulated Roundup. The increased toxicity of Roundup compared with technical glyphosate in some studies indicates that it is the surfactant (MONO 818) in Roundup that is the primary toxic agent (117). Acute toxicity information may be summarized as follows:

Glyphosate (technical): Acute toxicity ranges from a 48 hr EC5O for midge larvae of 55 mg/L to a 96 hr TL5O for the fiddler crab of 934 mg/L (15).

Roundup: Acute toxicity ranges from a 48 hr EC5O for Daphnia of 3 mg/L to a 95 hr LC5O for crayfish of 1000 mg/L (15).

Among the insects tested, the LD50 for honeybees was 100 mg/bee 48 hours after either ingestion, or topical application of technical glyphosate and Roundup. This level of experimental exposure is considerably in excess of exposure levels that would occur during normal field applications (15).

Aquatic Species (Fish) Technical glyphosate and the formulation Roundup have been tested on various fish species. Roundup is more toxic than glyphosate, and it is the surfactant that is considered to be the primary toxic agent in Roundup:

Glyphosate (technical):
Acute 96 hr LC5Os range from 24 mg/L for bluegill (Dynamic test) to 168 mg/L for the harlequin fish (15).

Roundup: Acute lethal toxicity values range from a 96 hr LC5O for the fathead minnow of 2.3 mg/L to a 96 hr TL5O for rainbow trout of 48 mg/L (15).

Tests with Roundup show that the egg stage is the least sensitive fish life stage. The toxicity increases as the fish enter the sac fry and early swim up stages.

Higher test temperatures increased the toxicity of Roundup to fish, as did higher pH (up to pH 7.5). Above pH 7.5, no change in toxicity is observed.

Glyphosate alone is considered to be only slightly acutely toxic to fish species (LC5Os greater than 10 mg/L), whereas Roundup is considered to be toxic to some species of fish, having LC5Os generally lower than 10 mg/L (15,118).

SUMMARY
Glyphosate when used as recommended by the manufacturer, is unlikely to enter watercourses through run-off or leaching following terrestrial application (117). Toxic levels are therefore unlikely to occur in water bodies with normal application rates and practices (118).

Glyphosate has oral LD5Os of 4,320 and 5,600 in male and female rats respectively. The elimination is rapid and very little of it is metabolized. The NOAEL in rats was 20,000 ppm and 500 mg/kg/d in dogs. No teratogenic effect was observed at doses up to 3,500 mg/kg/d and the fetotoxicity NOELS were 1,000 mg/kg/d in the rat and 175 mg/kg/d in the rabbit.

The evidence of oncogenicity in animals is judged as insufficient at this time to permit classification of the carcinogenic potential of glyphosate. The compound is not mutagenic.

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IMAZAPYR

In addition to the review that is presented below, a comprehensive review available from USDA Forest Service provides information that incorporates more recent studies and data. The US Forest Service risk assessment report is available at: http://www.fs.fed.us/foresthealth/pesticide/risk.shtml

Review conducted by MDAR and MassDEP for use in Sensitive Areas of Rights-of-Way in Massachusetts

Common Trade Name(s): Arsenal

Chemical Name: Imazapyr!
2-(4-isopropyl-4-methyl--5-oxy-2-imidazolin-2-yl)
nicotinic acid with isopropyl amine (2)

CAS No.: 81510-83-0

GENERAL INFORMATION

Imazapyr is effective against and provides residual control of a wide variety of annual and perennial weeds, deciduous trees, vines and brambles in non—cropland situations. It also provides residual control and may be applied either pre or postemergence. Postemergence is the preferred method especially for the control of perennial species. Imazapyr is readily absorbed by the foliage and from soil by the root systems. Imazapyr kills plants by inhibiting the production of an enzyme, required in the biosynthesis of certain amino acids, which is unique to plants (10, 100).

ENVIRONMENTAL FATE

Mobility

There are few studies which have investigated the mobility of Imazapyr in soil, but available reports indicate that Imazapyr does not leach and is strongly absorbed to soil (100). Imazapyr has a high water solubility (1 — 1.5%) which could generally indicate a high leaching potential, but as with other organic acids Imazapyr is much less mobile than would normally be expected (100). No soil partition coefficients have been reported, but they may be expected to be quite high (100).

One field study investigated Imazapyr mobility in a sandy loam soil (0.9% organic matter, 8.0% clay; 38.8% silt). Imazapyr did not leach below the 18—21 inch layer after 634 days and 49.6 inches of rain. The levels found below the 12 inch layer were just above the 5 ppb detection limit. In addition, this study investigated the off—target mobility of Imazapyr and found no residues further than 3 inches from the sprayed area after 1 year (102).

Although low levels of Imazapyr did move to the 18 to 21 inch layer this was only after nearly 2 years and fifty inches of rain. This indicates that imazapyr is relatively non-mobile and does not leach through the soil profile. Imazapyr remains near the soil surface and heavy precipitation may cause some off target movement from surface erosion of treated soils.

Persistence

The main route of Imazapyr degradation is photolysis. In a study of photodegradation in water, the half—life of Imazapyr was calculated as 3.7, 5.3 and 2.5 days in distilled water, pH 5 and pH 9 buffers respectively (101). A soil photolysis study for Arsenal on sandy loam calculated a half—life of 149 days (101).

Studies have investigated the persistence of Imazapyr in soil under aerobic and anaerobic conditions. The half-life of Imazapyr in soil has been reported as varying from 3 months to 2 years (100). A laboratory study found the half-life to be 17 months (101). Detectable residues were found in a field study in all soil layers to 21 inches at 634 days (102). Vegetation was sprayed with radio-labelled Imazapyr at a rate of 1 lb. a.i./acre. The soil was a sandy loam (0.9% organic matter) which received 49.6 inches of rain during 634 days. The highest level of radioactivity (0.234 ppm Imazapyr) was found in the top 3 inches of soil at 231 days after application and there were detectable levels in the 9-12 inch layer. The concentrations in the top layer increased steadily from day 4 to 231 when they reached their maximum (0.234 ppm) and then declined. At day 634 the level in the top layer (0-3 inch) was 0.104 ppm (102). These data indicate that Imazapyr is persistent in soil and, most importantly, that Imazapyr is translocated within plants from the plant shoots back to the roots and released back into soil. Very little of the Imazapyr actually reached the soil during application. The soil residues may be due to the decay of plant material containing Imazapyr in the soil (102).

TOXICITY REVIEW

Acute (Mammalian)

The acute oral LD5O in both male and female rats was greater than 5000 mg/kg using technical Imazapyr. The acute dermal LD5O in male and female rabbits was greater than 2000 mg/kg. The compound was irritating to the rabbit eye but recovery was noted 7 days after application of 100 mg of the test substance. It was classified as mildly irritating to the rabbit skin following application of 0.5 grams of the material on abraded or intact skin (103).

Arsenal product formulation was tested in a similar battery of tests. The rat oral LD5O value was greater than 5000 mg/kg and the rabbit dermal LD5O was greater than 2148 mg/kg. The irritation was observed following installation of 0.5 ml of the test substance in the skin study and 0.1 ml in the eye study (104).

Technical Imazapyr was administered to rats as an aerosol for four hours at a concentration of 5.1 mg/L. There were ten rats per sex and the animals were observed for 14 days after treatment before they were sacrificed. Slight nasal discharge was seen in all rats on day one but disappeared on day two (105).

The inhalation LC5O is greater than 5.0 mg/L for both the formulation and the technical product (105,106). Technical Imazapyr was applied dermally at the following dosages: 0, 100, 200 and 400 mg/kg/day (109). Arsenal was used at 0, 25, 50 and 100% of the formulated solution in sterile saline. Each dose group consisted of 10 male and 10 female rabbits and the test substance was applied to either intact or abraded skin and occluded for 6 hours each day.

The result of the dermal studies with Imazapyr as well as Arsenal were non remarkable with regard to body weights, food consumption, hematology, serum chemistry, clinical observations, necropsy observations and histopathology. It was noted that Arsenal, undiluted, was locally irritating (109).

Subchronic and Chronic Studies (Mammalian)

In the subchronic tests a NOEL for systemic toxicity with dermal administration in rabbits was 400 mg/kg/d (2,109). After dietary administration for 13 weeks in the rat, there was no effect at 10,000 ppm (571. mg/kg/d) which was the highest dose tested (141).

A bioassay is currently underway to evaluate the potential oncogenicity of technical Imazapyr. Groups of 65 rats per sex per dose group have received 0, 1000, 5000 or 10,000 ppm in the diet. Hematology, clinical chemistry and urinalysis tests were conducted at 3, 6 and 12 months and will also be done at 18 months and at study termination. At the 12 month sacrifice the only effect noted was a slight increase in mean food consumption in all treated female groups. Most of the increases were statistically significant, but they did not always exhibit a dose response. The oncogenicity test is due to be submitted to the EPA in the spring of 1989 (115).

Oncogenicity Studies

Chronic bioassays as discussed in the subchronic/chronic section are underway.

Mutagenicity Testing

Five different bacterial strains of Salmonella typhimurium (TA1535, TA98, TAlOO, TA1537, and TA1538) and one of Escherichia coli (WP-2 uvrA-) were used to evaluate the mutagenicity of Imazapyr. It is unclear whether the compound used was technical or formulated Imazapyr. Dose levels up to 5000 micrograms/plate were used and each strain was evaluated both in the presence or absence of PCB—induced rat liver 5—9 microsomes. Negative results were noted in all assays. The six tester strains were designed to detect either base-pair substitutions or frameshift mutations (113).

Developmental Studies (Mammalian)

Two teratology studies have been done and both of these studies evaluated technical Imazapyr. One study used rats as the test species and the other utilized rabbits (111,112).

Pregnant rats received dosages of 0, 100, 300 or 1000 mg/kg/d of Imazapyr during days 6—15 of gestation. There were 22 rats in the control group and 24, 23 and 22 in the low, mid and high dose groups. All doses were administered orally by gavage. Salivation was noted only during the dosing period in 6 of the 22 females in the highest dose group (1000 mg/kg). No other adverse observations were noted in the treated dams (111). Fetal body weight and crown-rump length data for the treated groups were comparable to controls. Fetal development (external, skeletal and visceral) “revealed no aberrant structural changes which appeared to be the result of the exposure to Imazapyr” (111). The NOEL for maternal toxicity was 300 mg/kg and the NOEL for teratogenicity and fetoxicity was 1000 mg/kg (116).

Four groups of 18 pregnant rabbits were exposed on days 6-18 of gestation to doses of 0, 25, 100, 400 mg/kg/d Imazapyr. There was no statistically significant difference between control and treated groups at any dose (112).

Avian

Acute oral LD5Os of Imazapyr in bobwhite quail and mallard duck were 2150 mg/kg. The 8 day dietary LC5O in the bobwhite quail and mallard duck were greater than 5000 ppm (101).

Invertebrates

The dermal honey bee LD5O for Imazapyr is greater than 100 mg/bee (101). The LD5O (48 hr) was greater than 100 mg/L for the water flea (100).

Aquatic

The LC50s of Imazapyr in the rainbow trout, bluegill sunfish and channel catfish were greater than 100 mg/L (101).

SUMMARY

Imazapyr is a relatively immobile herbicide in the soil profile even when used in sandy and low organic content soils. It is also persistent in soils. The low mobility and persistence may result in off-target movement of Imazapyr from surface erosion of treated soils.

The atypical soil—plant flux characteristics of Imazapyr and delayed maximum soil concentrations indicate that repeated annual applications may result in build—up of Imazapyr in soil. Consequently, an interval is required to allow for the degradation of soil residues before a repeated application is made.

The oral LD5O of Imazapyr in rats is greater than 5000 mg/kg and the derrnal LD5O is greater than 2000 mg/kg in rabbits. The oncogenicity bioassay is currently underway and the only effect reported in the interim study was an increase in food consumption in the treated females. No mutagenic effects were observed.

The acute oral LD5Os of Imazapyr and the Arsenal formulation are greater than 5000 mg/kg. In the subchronic 13 week rat study there was no effect observed at the highest dose tested 10,000 ppm. The oncogenicity study is currently underway.

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METSULFURON METHYL

In addition to the review that is presented below, a comprehensive review available from USDA Forest Service provides information that incorporates more recent studies and data. The US Forest Service risk assessment report is available at: http://www.fs.fed.us/foresthealth/pesticide/risk.shtml

Review conducted by MDAR and MassDEP for use in Sensitive Areas of Rights-of-Way in Massachusetts

Common Trade Names: Escort, Escort XP (2)

Chemical Name: Methyl 2 E[C[(4-Methoxy—6-methyl-l,3,5-Triazifl—
2-yl) aminolcarbonyl] amino] sulfonyl.]benzoate] (9)

CAS NO.: 74223-64-6

GENERAL INFORMATION

Metsulfuron methyl is a sulfonyl urea herbicide initially registered by E.I. DuPont in 1986. It is a foliar herbicide registered for use on wheat and barley and non-cropland sites such as Right of Way (9).

ENVIRONMENTAL FATE

Mobility

Metsulfuron methyl is a relatively new herbicide. The studies reviewed here have been provided by the registrant, EI DuPont.

The soil water partition coefficients (Kd) of Metsulfuron Methyl have been determined in four different soils: Cecil sand, Flanagan silt loam, Fallsington silt loam, and keyport silt loam. The Kd values range from 0.36 for Cecil sand to 1.40 for Flanagan silt loam, and Kom values ranged from 29 for Fallsington silt loam to 120 for Cecil sand (100). The values for Kd and Kom indicate that metsulfuron methyl is not adsorbed well to soil and that the organic content of the soil is not the only adsorption component. The silt and clay contents appear to influence adsorption, but there are probably other factors also involved.

The previous study also determined the Rf values for soil. Thin layer chromatography was performed on four soils for metsulfuron methyl. The Rf values ranged from 0.64 to 1.00; only one value was less than 0.90 (100). This result confirms the validity of the Kd values, indicating that metsulfuron methyl is mobiie and that the organic matter content of the Soil is a significant component of adsorption.

Metsulfuron methyl was applied to tops of 12 inch columns [containing four different soils], and eluted with 20 inches of water in 20 hours. Following the percolation of the total volume of water, 106% of the metsulfuron

methyl was eluted from the Fallsington sandy loam, 96% from the Flanagan silt loam, 81% for Keyport silt loam and 93% for Myakka sand (100). The breakthrough volumes for the Fallsington, Flangan, Keyport and Myakka soils were 6.5, 4.5, 6.9 and 5.8 inches of water respectively (101).

Metsulfuron methyl is relatively mobile in most soils, but will be retained longer in soils with higher percentages of organic matter.

Persistence

There are two studies which have reviewed the persistence of metsulfuron methyl in the soil. One study was conducted in the southern United States and the second was in the northern United States and Canada. The results of the studies indicate a somewhat contradictory picture of the persistence of metsulfuron methyl.

The soil half-lives in Delaware, North Carolina, Mississippi and Florida were 1 week, 4 weeks, 3 weeks and 1 week respectively following an application in mid to late summer (102). The results are varied and indicate that either climatic or soil factors determine the persistence. The climate is sufficiently similar to be able to discount that as a factor. However, both of the locations where the shortest half-lives were observed had the highest organic matter content in the soils. Furthermore, the half—lives correspond with the organic matter content.

The half—lives following spring applications were 4 and 56 weeks for two sites in Colorado, 6 weeks in North Dakota and 28 weeks in Idaho (103). In contrast to the southern United States study there does not appear to be any correlation with climatic or soil characteristics. There appears to be a slightly shorter half—life in acidic soils in the same location.

Metsulfuron methyl was also applied in the fall and the half-lives determined in two sites in Colorado, North Dakota and Idaho. These half—lives were 8 weeks, 12 weeks, 42 weeks and 28 weeks respectively. As was expected there were longer half—lives following fall applications in North Dakota (6 weeks vs. 42 weeks) however, in Idaho there was no change at all, which is unexpected.

In Canada following spring applications the reported half-lives were 10 weeks, 4 weeks, 4 weeks and 6 weeks for Alberta, 2 locations in Saskatchewan and Manitoba (103). One would expect longer half lives in Northern locations due to the effects of temperature on degradation rates. The results from Canada are generally shorter than those in the U.S. locations, which is unexpected.

Therefore, the half-life of Metsulfuron methyl in the soil is variable and dependent on the location. It is shorter when applied in the spring but appears independent of other environmental factors in most locations.

TOXICITY REVIEW

Acute (Mammalian)

The toxicology database for Metsulfuron methyl has been reviewed and accepted by the EPA (9). DuPont supplied excerpts from their monograph on Ally herbicide (112). Summaries of studies were supplied by DuPont for subchronic, chronic and reproductive studies.

Technical metsulfuron methyl has been tested in two acute oral LD50 studies in Crl:CD Rats. In the first study the LD5O was greater than 5,000 mg/kg and in the second it was greater than 25,000 mg/kg (the maximum feasible dose) (112). Clinical signs included salivation, chromodacryorrhea, stained face, stained perineal area and weight loss (112).

In a 10—dose subacute study using male rats, a single repeated dose of 3,400 mg/kg/day for 10 days over a 2 week period was administered. This was followed by a two week recovery period. No deaths occurred and slight weight loss was the only clinical sign observed. In addition, no gross or microscopic changes were observed (112). The dermal LD50 is greater than 2,000 mg/kg in male and female rabbits (112). Technical metsulfuron methyl caused mild erythema as a 40% solution in guinea pigs. There was no reaction observed at the 4% concentration. No response occurred when treated animals were challenged (112).

In rabbits, moderate areas of slight corneal clouding and severe to moderate conjunctivitis were observed in both washed and unwashed eyes following treatment with technical metsulfuron methyl. The unwashed eyes were

normal in 3 days and the washed eyes in 14 days (112).

Metabolism
Elimination of metsulfuron methyl in the rat is rapid, with 91% of a radioactive dose excreted over 96 hours (9). The routes of elimination were not specified within the report.

Subchronic/Chronic (Mammalian)
Ninety day feeding studies have been done with metsulfuron methyl in rats and mice. The rat study was done in conjunction with a one generation reproduction study (see Developmental Study Section). In this study rats received 0, 100, 1000, or 7500 ppm (0, 5.7, 57, 428 mg/kg/d) (a) in their diets. Effects observed at the high dose were: a decrease in body weight and an increase in total serum protein in the females, and a decrease in liver weight and a decrease in cytoplasmic clearing of hepatocytes in the males the NOEL in this study was 1000 ppm (104).

The 90 day mouse study was done in conjunction with the 18 month mouse study. Groups of 90 mice per sex per dose received 0, 5, 25, 500, 2500 or 5000 ppm (0, 0.66, 3.3, 66.6, 333.3, 666.6 mg/kg/d) in their diets. Clinical evaluations were made at 1, 2, 3, 6, 12 and 18 months. Ten animals per group were sacrificed at the 90 day time point for pathological evaluation. The 2500 ppm group was sacrificed at 12 months. Sporadic effects were observed on the body weight, food consumption, and organ weights. These were not dose related, resulting in a NOEL of 5000 ppm in diet for mice (111).

In the twenty-one day dermal rabbit study, the intact skin of male and female New Zealand White Rabbits received doses of 0, 125, 500 and 2,000 mg/kg for 6 hrs/day for 21 days. Clinical signs observed were sporadic weight loss and diarrhea in a few rabbits. These effects were not dose related. Non dose related histological effects were observed in male rabbits. This effect was characterized as mild testicular atrophy occurring sporadically at all doses (112, 108).

Feeding studies in dogs have been done with purebred beagles. The animals received metsulfuron methyl in diets at dose levels of 0, 50, 500 and 5000 ppm (0, 0.2, 2, 20 mg/kg/d) for one year. There was a decrease in food consumption in the high dose males. There was a decrease in serum lactate dehydrogenase in all groups of both sexes at two or more doses these values were within the historical controls. The NOEL was 500 ppm in the males and 5000 ppm in females (112).

In a chronic feeding study in rats, the animals received metsulfuron methyl at doses of 0, 5, 25, 500, 2500 or 5000 ppm (0, 0.28, 1.4, 28.6, 143 or 286 mg/kg/d. Interim sacrifices were done at 13 and 52 weeks (105).

At the 13 week sacrifice there was a decrease in body weight in the 2500 and 5000 ppm groups; there was a decrease in absolute liver weight at 2500 and 5000 ppm males. There was a decrease in the relative liver weights in the 2500 and 5000 ppm females.

(a) In these discussions the assumptions made for estimated conversion of ppm (diet) to mg/kg/D were:
Species Body weight (kg) Intake (kg)
Rat 0.35 0.020 Mouse 0.03 0.004 Dog 10 0.4
When data were presented as ppm, the dose was estimated in mg/kg and is presented in parenthesis.

Findings at the 52 week sacrifice included increase in kidney weight (2500 ppm males) and increased absolute brain weights (at doses of 25, 500, 2500 and 5000 ppm) in males and at doses of 2,500 and 5000 ppm in females. There was an increase in absolute heart weight at 2500 ppm in males and at 2500 and 5000 ppm in females. The absolute organ weights were back to normal at termination. Relative brain weights of the 2500 and 5000 ppm groups were increased (105)

Oncogenicity Studies
There were no gross or histopathological changes observed in mice receiving up to 5000 ppm metsulfuron methyl in their diets (112. 111). Similar results were obtained in the 104 week rat study; there were no histopathological changes observed which were attributable to metsulfuron methyl (105, 112). EPA concludes that there were no

oncogenic effects in rats or mice at the highest dose tested; 5000 ppm in both cases (9).

Mutagenicity Testing

Metsulfuron methyl was negative in the unscheduled DNA synthesis assay; in vivo bone marrow cytogenic assay in rats (doses were 500, 1,000, and 5,000 mglkg bw); CHO/HGPRT Assay; Salmonella typhimurium reverse mutation assay four strains with and without S9 metabolic activation; and also in the in vivo mouse micronucleus assay at doses of 166, 500, 1666, 3000 and 5000 mg/kg (112). 'T¶e only positive mutagenicity assay was in the in vitro assay for chromosome aberrations in Chinese Hamster Ovary at high doses (greater than 2.63 mM, 1.0 mg/mL)). In this assay no increases in structural aberrations were observed at 0.13 or 1.32 mM(0.05 or 0.5 mg/mL) (112).

Developmental Studies

Several studies have been done to investigate the effects of Metsulfuron methyl on reproduction and development in rats and rabbits.

Pregnant Cr1: COBS CD(SD) BR rats received metsulfuron methyl at doses of 0, 40, 250 or 1000 mg/kg by the oral route on days 5 to 14 of gestation. There were 25 rats per group. Maternal toxicity was observed at doses of 250 and 1000 mg/kg/d. The maternal toxicity NOEL was 40 mg/kg/d. There was no evidence of "teratogenic" response or embryo fetal toxicity (112).

In the rabbit study, New Zealand white rabbits received 0, 25, 100, 300 or 700 mg/kg/d on days 6 to 18 gestation. There was a dose related increase in maternal deaths; 1, 2 and 12 deaths at doses of 100, 300 and 700 mg/kg respectively. The maternal toxicity NOEL was 25 mg/kg/d and there was no evidence of teratogenic or embryolethal effects observed in this study (112).

Several multigenerational studies have been done with Metsulfuron methyl. A four litter reproduction study was done concurrently with the chronic bioassay. Rats from each treatment were separated from the main study and bred. The doses were 0, 5, 25, 500, 2500, and 5000 ppm (0, 0.28, 1.4, 28.6, 143 and 286 mg/kg/d). There was a dose dependent decrease in body weight in the parental (P1) generation at doses of 25 ppm and greater in males and females. This effect was not present in dams during gestation or lactation (106).

Overall fertility in the P1 and filial (Fl) matings was low in both control and treated groups with no apparent cause. There was a decrease in pup size in the Fla but not the Flb, F2a, or F2b litters. The gestation index was 100% for all groups in both filial generations with the exception of F2a when it was 90%. On the basis of the lower body weights and lower growth rates, the NOEL was 25 ppm for this study (106).

In a 90 day, 2 generation 4 litter protocol, rats received 0, 25, 500 or 5000 ppm (0, 1.4, 28.6, 286 mg/kg/d) Metsulfuron methyl in their diets for 90 days prior to mating. In this protocol the parental generation was bred twice first to produce the Fla and then the FiB. The FiB rats were then fed the appropridte diet for 90 days (after weaning). There was a decrease in litter size in the 5000 ppm group in the F2a generation, but not in any other generation. The NOEL for this study was 500 ppm (107).

In a 90 day feeding, one generation rat study, 16 male and 16 female rats received 0, 100, 1000 or 7500 ppm in their diet prior to mating. There were no differences observed in reproduction and lactation performance or litter survival among groups. There was an overall low fertility in the control and treated groups. This result made the effects of metsulfuron methyl on fertility difficult to assess from this study (104).

Tolerances and Guidelines

Tolerances have been set for metsulfuron methyl in barley wheat (from 0.05 to 20 ppm, depending on the commodity) and in meat and meat byproducts (0.1 ppm). The tolerance in milk is 0.05 ppm (8, 9). The acceptable daily intake is 0.0125 mg/kg/d based on a one year dog NOEL of 1.25 mg/kg/d using a safety factor of 100 (9).

Avian

Metsulfuron methyl has been tested in two species of birds, the mallard duck and the bobwhite quail. The acute oral LD5O is greater than 2150 mg/kg in the duck. Two, 8 day dietary studies have been done. The 8 day LC5O is greater than 5620 ppm in both the duck and the quail (9).

Invertebrates

The 48 hour LC5O for Daphnia is greater than 150 ppm and the acute toxicity in the honeybee is greater than 25 mg/bee (9).

Aquatic

Metsulfuron methyl has acute LC5O of greater than 150 ppm in both the rainbow trout and the bluegill sunfish (9).

Summary

Metsulfuron methyl has a moderate to high mobility in the soil profile and is relatively persistent in the environment, especially when applied in the fall. These factors would be of concern under most circumstances. However, metsulfuron methyl is applied at very low rates (3-4 ozs./A) and therefore the amounts which reach the soil are quite low. Consequently, Metsulfuron methyl should not impact groundwater as a result of leaching or migrate from the target area. Metsulfuron methyl has low toxicity (EPA Toxicity Category III) for acute dermal exposure and primary eye irritation and is category IV for all other acute exposures. The chronic studies indicate no oncogenicity response and the systemic NOEL's are 500 ppm in rats and 5000 ppm in mice. There was no evidence of teratological effects in the rat or the rabbit at the highest dose tested in both species. While there was evidence of maternal toxicity at 40 mg/kg/d in the rat and 100 mg/kg/d in the rabbits.

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TRICLOPYR

In addition to the review that is presented below, a comprehensive review available from USDA Forest Service provides information that incorporates more recent studies and data. The US Forest Service risk assessment report is available at: http://www.fs.fed.us/foresthealth/pesticide/risk.shtml

Review conducted by MDAR and MassDEP for use in Sensitive Areas of Rights-of-Way in Massachusetts

Common Trade Name(s): Garlon 3A, Garlon 4

Chemical Name: Triclopyr [(3 ,5,6-Trichloro-2-pyridinyl) oxy] acetic acid

CAS No: 55335—06—3

GENERAL INFORMATION

Triclopyr is a picolinic acid derivative and is marketed as Garlon 3A the triethylamine (TEA) salt (CAS #057213-69-1) and Garlon 4 the butoxyethyl ester ***(CAS#*** 008008-20-6).

Triclopyr is effective against a wide variety of woody plants as a foliar spray, basal spray and when applied to cut surfaces. Triclopyr is absorbed by both plant leaves and roots and is readily translocated throughout the plant. It produces an auxin-type response in growing plants in that it appears to interfere with normal growth processes. Thus, maximal plant response occurs when applications are made soon after full leaf development and when there is sufficient soil moisture for plant growth.

ENVIRONMENTAL FATE

Mobility

Most laboratory and field studies indicate that Triclopyr is a relatively mobile herbicide under most conditions. Soil organic carbon partition coefficients K(oc) were determined for the TEA salt in 12 soils which ranged from 0.081% to 21.7% organic carbon. The K(oc) values range from 12 to 78 (14), indicating that Triclopyr should be mobile in most soils. In the same study the K(oc) values of trichloropyridinol, the major metabolite, were reported to range from 114 to 156 in three soils which were not identified. This indicates that trichloropyridinol is less mobile than Triclopyr and should have moderate mobility in soil(14).

In a laboratory study using sandy loam soil with a low organic matter content (0.62%), 75-80% of the applied Triclopyr leached through a 12 inch soil column between days 11 and 15. Water was applied at the rate of 0.5 inches/day for 45 days. The major degradation product, tricloropyridinol required 13 inches of applied water to elute, nearly twice as much (7.5 inches) as Triclopyr(14).

In a field study, Garlon 3A was applied at the rate of 3 gallons/ acre (9 lbs/acre) to six soils ranging from clays to loamy sands in six states. Rainfall was reported to be normal, but not given. Small amounts of Triclopyr and its metabolites were found in the 6—12 inch and 12-18 inch layers of soil 28 to 56 days after application (14,15). Although an application rate of 9 lbs per acre is rather high, the presence of Triclopyr at those depths should be noted especially since there is a correlation with the previous laboratory studies.

In other studies, Triclopyr exhibited significantly lower mobility than had been previously reported. In a field study conducted in Massachusetts, Triclopyr was applied to sandy loam soil at a rate of 0.6 lb/acre. Rainfall was reported as normal, but not given. Triclopyr was never detected below the top ten inch layer of soil at any time during the three month study (100). As part of the same study, Triclopyr was applied to soil columns containing the same soil as in the field study at the rate of 0.6 and 6.0 lbs/acre. Simulated rainfall was applied to the soil columns at a rate of 1 inch per week for a total of 5 inches. Triclopyr was not detected below the top 4 inch layer of soil (100). These results indicate lower mobility than previously reported, but they may reflect the short persistence of Triclopyr in soil rather than its mobility through the soil profile.

Persistence

Soil

Microbial degradation is the primary mechanism by which Triclopyr is degraded in soils to two metabolites (15). Degradation under anaerobic conditions (i.e. saturated soils) is reported to be 5 to 8 times slower than under aerobic conditions (14). Triclopyr in soils is not thought to be degraded to any appreciable extent by chemical hydrolysis and, due to its low volatility, is not thought to volatilize from soil to any great extent (15).

A review by TRW states that Triclopyr "is not considered to be a persistent compound in soils" (95). Studies indicate that under certain conditions the half-life of Triclopyr can be relatively short. The Dow Chemical Company has reported a half-life of 10 days in silty clay loam (96). In a small West Virginia watershed the half-life was estimated as between 14 and 16 days (15). Triclopyr was applied aerially at the rate of 10 lbs/acre, but much of the Triclopyr was intercepted by foliage. Average Triclopyr residues in soil from the treated area of this study, measured on the day of the treatment, were non—detectable in densely wooded areas, 4.4 ppm in lightly wooded areas, and 18 ppm in open areas (15). In a Massachusetts field study, the half—life of Triclopyr was reported as 10 days after the applications of 0.6 and 6.0 lbs/acre Triclopyr to non-target vegetation (100).

Most other studies suggest a much longer persistence for Triclopyr in soil. In a laboratory study, Dow reported a half-life of 46 days for Triclopyr in loam. The loam was maintained in the laboratory at **95 deg** F with moisture at field capacity for the duration of the study (96). A **95 deg** soil temperature and moisture at field capacity are both quite high and indicate that the persistence at less than ideal conditions would be longer. Dow also reports the average half-life of Triclopyr in soil to be 30 days (101). An average half-life of 46 days is reported in the Herbicide Handbook (10) and by Ghassemi et al. (95). In addition, other investigators have reported a half—life in soil of "less than 50 days" at temperatures between 25-35 deg C, and between 79 and 156 days at 15deg C (14). In a field study conducted in Sweden, Garlon 3A was applied at the rate of 2 lbs (a.i.)/acre to eight different forest soils. Residues of Triclopyr persisted for 1 to 2 years, and in some cases in excess of 2 years, at levels approximately 10 percent or less of initial soil residue levels (15). It must be noted that soil temperature levels never exceeded 14deg C (57 deg F) and these temperatures are not favorable to microbial degradation (15). These low maximum temperatures are not typical of year round Massachusetts temperatures, but indicate the increased persistence that may occur when applications are made in the fall and are followed by cold weather.

The variable half-lives reported for Triclopyr indicate that soil half-life may be dependent on the soil and climatic conditions. As in most situations of microbial degradation; cold and, dry or saturated soils decrease the decomposition rate, while warm moist soils increase it.

Aquatic

The fate of the butoxyethyl ester of Triclopyr (TBEE) in water is summarized in Figure 1. This diagram shows the major degradation pathways for the ester in water, but does not include processes such as sediment and particulate adsorption. The fate of the ester in water has also been simulated with a modelling technique by McCall et al., 1988 (115). A recent study by Woodburn (116) with the triethylamine salt of Triclopyr experimentally applied to a lake in Florida also provides useful comparative data on the persistence of Triclopyr degradation products. The degradation path is believed to be TBEE to Triclopyr acid to 3,5,6—trichloro-2-pyridinol (TCP) to non-halogenated organic acids.

TBEE degrades quite rapidly in water to Triclopyr acid. Laboratory studies indicate that photolysis is the principal degradation pathway with hydrolysis also contributing (117, 118). Several studies indicate that the half-life of the ester in water can range from 1.5—2 days as a result of photolysis (117, 119). Hydrolysis half—lives are dependent upon water pH and temperature and range from 0.06 d to 208 d in natural waters. They decrease with increasing temperature and increasing pH. Acidic conditions increase the persistence of the ester substantially. The 208 d half—life was observed in natural unbuffered water at pH 5 and 15°C. Waters with this pH level occur in Massachusetts. One laboratory study has produced contradictory results where the ester was stable to hydrolysis, and little photodegradation of the ester occurred over 9 months (120). This study however was performed with buffered, sterile water. Modelling results for the dissipation of the ester indicate that decay should be fairly rapid with a half-life of 12-18 hours (115).

The acid is short-lived in the aquatic environment with reported half—lives of from 2.1 hours at the water's surface in summer at **40deg** N latitude to 14 hr at 1m water depth in winter (117). The principal decay product of the acid is 3,5,6-trichloro-2-pyridinol (TCP), a transient metabolite in water with half—lives ranging from minutes to one day (121). TCP rapidly degrades into nonhalagenated, low molecular weight organic acids (116,121), with phototransformation playing a larger role than hydrolysis in this process.

Salomon et al. (118) demonstrated a half—life of 3.8-4.3 days at l6-17 deg C for the ester to TCP step in an Ontario Lake. Woodburn (116) added Triclopyr salt to a Florida lake and determined a half—life of 0.5—3.6 d at 300 C for the salt to organic acid step. The time scales of both of these studies are in general agreement with the other data on the time course of breakdown for the ester (or salt) to organic acids. With the exceptions of the Hamaker (120) study and a slow breakdown at pH 5, most studies indicate that TBEE in water is degraded relatively rapidly.

TOXICITY REVIEW

Acute (Mammalian)

The Triclopyr toxicity database has been reviewed in several places including the GEIR on the Control of Vegetation on Utility and Railroad Rights-of-Way in Massachusetts (14), Herbicide Handbook Weed Science Society of America (10), and by the U.S. Forest Service (15). Several Dow Publications review the Triclopyr information (101) and Garlon products (102 and 103).

The oral LD5O for Triclopyr in rats is 729 mg/kg in males and 630 mg/kg in females (15, 101). The rat oral LD5O for combined sexes has been reported as 713 mg/kg (10, 14). Rabbits and guinea pigs are more susceptible to oral administration of Triclopyr with LDSOs of 550 and 310 mg/kg respectively (14, 15, 10). The Garlon products have oral LD5Os of greater than 2000 mg/kg (10, 14, 15, 101, 103, 103).

The dermal LD5Os are greater than 2000 mg/kg in rabbits (Triclopyr), and greater than 3980 mg/kg in rabbits for Garlon 4 and Garlon 3A (101, 102, 103)

The effects of Triclopyr on the eye are dependent on the chemical derivative involved: the butoxyethyl ester found in Garlon 4 is essentially non—irritating (102, 15, 14, and 101), while the triethylamine salt is not only an irritant but can cause serious injury (101, 14, 15). These eye injuries include conjunctival irritation, moderate internal redness and moderate to severe corneal damage which may be permanent (14). An inhalation study showed that 100% of the test rats survived a 1 hour exposure to 3 to 20 dilutions of Garlon 3A in air. Transitory nasal irritation to rats was noted after a 4 hour exposure to Garlon 4 aerosol (14).

Metabolism

Two studies, one dermal and one oral have been done in humans to determine pharmacokinetic and metabolic profiles. Five mg/kg acid equivalent (ae) was applied to the forearm of 5 volunteers in the dermal study. One point five eight percent to 1.11% of the applied dose was absorbed and the percutaneous absorption half -life was 16.8 hours (108). In the oral study, 6 volunteers received 0.1 or 0.5 mg/kg Triclopyr (acid equivalent) in apple juice. The excretion half—life is 5 hours and 80% of the dose is recovered as unchanged Triclopyr in the urine (109). The 20% which was unaccounted for could be attributed to one of several explanations including incomplete collections of urine, incomplete absorption of material or metabolism to an unknown metabolite.

Subchronic/Chronic Studies (Mammalian)

Long—term bioassays have been done using Triclopyr in rats (107) and mice (106). Summaries of these studies, provided by Dow Chemical Company have been reviewed for this discussion.

Fischer 344 rats received 5, 20, 50 or 250 mg/kg/d in a preliminary 13 week study. There was a decrease in body weight gain at 50 and 250 mg/kg/d and kidney effects were observed in both sexes at doses of 20 mg/kg or greater (107). In the full two year study, the doses were 0, 3, 12 and 36 mg/kg/d. The dose related effects in the males were increased body weight at 12 and 36 mg/kg/d, and in females there was an increase in pigmentation in the proximal tubules at 3, 12 and 36 mg/kg/d. Neither the weight increase in the males nor the increased pigmentation in the females were accompanied by morphological, histological or functional changes. The NOAEL for males and females was reported to be 3 mg/kg/d (107).

In the mouse bioassay, ICR mice received Triclopyr in their diets for twenty-two months. The doses were 0, 50, 250, 1250 ppm (0, 5, 55, 28.6 and 143 mg/kg/d in males and 0, 5.09, 26.5 and 135 mg/kg/d in females). The range finding study included doses of 0, 200, 400, 800, 1600 or 3200 ppm. At the high dose there were decreases in body weight, anemia, changes in urine, increase in cholesterol levels and multiple changes in liver functions. Some of the liver changes were also observed in the 1600 and 800 ppm groups. There were decreases in body weights, changes in kidney and urine (at various doses and points in time) and liver effects at the 1250 ppm dose. At 250 ppm there were mild kidney effects and the NOEL was reported as 50 ppm (5.55 and 5.09 mg/kg/d for males and females respectively) (106).

In subchronic studies, the 90 day dietary NOELs were 30 mg/kg/d and 20 mg/kg/d for rats and mice, respectively. Dogs were more sensitive to dietary administration of Triclopyr, with kidney effects (decrease in excretion) at 2.5 mg/kg/d (14, 101). Dogs refused to eat food that would result in doses of 30 and 100 mg/kg (104). In a one year study, dogs received doses of 0. 0.5, 2.5 or 5.0 mg/kg/d. Minimal kidney effects were observed at 2.5 and 5.0 mg/kg/d. These findings were considered non—adverse by Dow making the NOAEL 5.0 mg/kg/d and the NOEL 0.5 mg/kg/d (105).

Two monkey studies were done to investigate kidney effects in primates. In one study, the monkeys received 0, 10, 20 or 30 mg/kg/d in diet for 28 days. There was no effect on urinary excretion or other responses observed (101, 104). In a second study, 4 monkeys received Triclopyr at 5 mg/kg/d for 28 days, the dose was then increased to 20 mg/kg/d for 102 days. The effects observed in this study were stool softening and diarrhea (104).

Oncocrenicitv Studies

There have been two chronic bioassays done for Triclopyr. Rats received 0, 3, 12 or 36 mg/kg/d and mice received 0, 50, 250 or 1250 ppm (0, 5.55, 28.6, 143 mg/kg/d for males and 0, 5.09, 26.5 and 135 mg/kg/d for females). The only positive result was an increase in combined incidence of mammary adenomas and adenocarcinomas in the female rats at the high dose. There was no evidence of multiple tumors and the effect was not dose related (107, 106).

Mutagenicitv Testing

Triclopyr has been tested for mutagenicity in a variety of test systems and found to be weakly positive in one, the dominant lethal study in rats. Triclopyr was non-mutagenic in bacterial assay systems, cytogenic assays, and mouse dominant lethal studies (15).

Developmental Studies

The teratology of Triclopyr was investigated using the rabbit model. Doses in the range finding study were 0, 25, 50, 100 and 200 mg/kg. There was 50% and 71% mortality in the 100 and 200 mg/kg groups respectively. The doses used in the full study were 0, 10, 25 and 75 mg/kg/d for days 6 to 18 of gestation. There were 16 rabbits per dose group. One dam in the 25 mg/kg/d group aborted and one dam in the 75 mg/kg/d group died. In the 25 mg/kg group one fetus had hyperplasia of the aortic arch with pulmonary arterial semilunar valve stenosis. Another fetus had a missing gall bladder. There was a statistically significant but non-dose related increase in resorptions at 10 mg/kg/d. This increase was within historical control variability. The developmental NOEL was reported as 75 mg/kg/d with a slight increase in maternal mortality
(110)

Tolerances and Other Guidelines

Tolerances are set for Triclopyr on 5 raw agricultural commodities:
grasses, forage (500 ppm); grasses, forage, hay (500 ppm); milk (0.01 ppm); meat, fat and meat by products (except liver and kidney) of cattle, goats, hogs, horses, and sheep (0.05 ppm); and liver and kidney of cattle, goats, hogs, horses, and sheep (0.5) ppm (8).

The Dow internal guideline for inhalation exposure to Triclopyr is 10 milligrams/cubic meter (102, 103).

Avian

The toxic effects of Triclopyr on birds have been investigated in a small number of studies conducted by the Dow Chemical Company. For mallard ducks, acute oral LCSOs are reported at 1,698 mg/kg for unformulated Triclopyr, 3,176 mg/kg for Garlon 3A, and 4,640 mg/kg for Garlon 4. Eight day subchronic oral LC5Os are reported as follows for the various triclopyr formulations:

Triclopyr	
	mallard duck LC50 = 5,000 ppm
	bobwhite quail LC50 = 2,935 ppm
	Japanese quail LC50 = 3,278 ppm
Garlon 3A	mallard duck LC50=10,000 ppm
	bobwhite quail LC50=11,622 ppm
Garlon 4	mallar d duck LC50=l0,000 ppm
	bobwhite quail LC50=9,026 ppm

Source: (15)

The data summarized above indicate low acute and subchronic toxicity to the bird species tested. No field studies on the toxic effects of Triclopyr or its formulations in birds have been reported (15).

Invertebrates

Very little data were available on the invertebrate and microorganism toxicity of Triclopyr. The data reported are primarily for the triethylamine salt (Garlon 3A) and were generated by the Dow Chemical Company.

The data indicate low acute lethal toxicity* to organisms tested, with a 96 hr LC5O of 895 ppm in shrimp, 96 hr LC5O greater than 1000 ppm in crabs, and 48 hr LC5Os ranging between 56 and 87 ppm in oysters (15). The 48 hr LC5O for Daphnia is reported as 1,170 ppm (15). After 72 hours of incubation with 500 ppm of Triclopyr, no apparent effects on growth were observed in six soil microorganisms when compared to a control (15).

No information was obtained on the invertebrate toxicity of Garlon 4, the butoxyethyl ester of Triclopyr.

Aquatic

The available information on Triclopyr toxicity to fish indicate a wide response of fish to the two formulations of Triclopyr and to unformulated Triclopyr. The butoxyethyl ester of Triclopyr (Garlon 4) is "highly toxic to fish", based upon the Clarke et al. criteria. The 96 hour LC5O values for rainbow trout and bluegill sunfish are 0.74 and 0.87 ppm respectively (15). The corresponding value for juvenile Coho salmon is 1.3 ppm (122).

The triethylamine salt formulation (Garlon 3A) is "slightly toxic" to fish with 96 hour LC5Os of 552 and 891 ppm for rainbow trout and bluegills respectively. The corresponding values for unformulated Triclopyr are 117 ppm for rainbow trout and 148 ppm for bluegill. Both fish species were less sensitive to Garlon 3A than to the active ingredient (15).

No fish toxicity data are available for 3,5,6—trichloro—2—pyridinol (TCP), the intermediate breakdown product from the Triclopyr acid to the non—halogenated organic acid end product.

Dow Chemical Company reports that in natural soil and aquatic environments, both amine and ester formulations rapidly convert (photodegrade) to Triclopyr acid, which in turn is neutralized to a salt at normal environment pH (5.5-6.5)(15). No information is provided with any of the fish toxicity data on the actual form of Triclopyr present in the test water. The persistence data summarized in a previous section and the simulation results of McCall et al. (115), however provide a description of the probable fate of Triclopyr in the toxicity test tanks. The majority of the fish mortalities during the toxicity tests with bluegill sunfish and rainbow trout exposed to the ester occurred during the first 24 hours of the test: a pattern consistent with the change of the toxic ester form to less toxic breakdown products during this period (124).

EXPOSURE ASSESSMENT

For the exposure assessment, we have chosen to analyze the fate of the butoxyethyl ester form of Triclopyr (Garlon 4) in water because of its reported high aquatic toxicity in laboratory studies. Garlon 4 would be applied basally at an average application rate of 0.5 pints per acre for the proposed utility program.

In aquatic organisms, LC5Os greater than 10 ppm are considered to be indicative of only slight toxicity and LC5Os less than 1 ppm are considered to reflect high acute toxicity (Clarke et al., 1970 as referenced in [15]).

Since Garlon 4 contains 61.6% of the active ingredient, this application could distribute 37 mg Triclopyr BEE/m^2. The requested maximum application rate is 2 pints per acre.

Two aquatic exposure scenarios have been constructed to evaluate the potential contamination of non-target surface waters with Garlon 4 from a typical land application. The first, most extreme, and very unlikely scenario is for the case of a static stream traversing a treated acre with a percentage of all of the herbicide applied to the acre running into the water. The second represents a more shallow, static stream or standing water body of much less volume with runoff from a portion of the bordering land.

SCENARIO (1)

ASSUMPTIONS:

Application rate = 0.5 pint/acre
0.47 L/pint
61.6% active ingredient
20% of herbicide applied to acre runs off
density of applied herbicide = 1.0 g/ml

RUNOFF:

0.20 x 0.5 pt/acre x 0.47 L/pt x 0.616 = 0.03 L/acre

RECEIVING WATER:

Static stream crossing a treated acre
Dimension: 0.3 x 1.22 x 64 m = 23.4 **in**^{3} (volume)

DILUTION:

0.03L into 23.4 m = 1.3 mL/m^3
1.3 mL/m^3 x 1 m^3 /10^3 L = 1.3 x 10 mL/L
1.3 x $l0^{-3}$ mL/L x 1 g/ml x $l0^3$ mg/g = 1.3 mg TBEE/L

SCENARIO (2)

ASSUMPTIONS:

Application Rate = 0.5 pt/acre
0.47 L/pt
61.6% active ingredient **2**
20% of herbicide applied to 3m^2 runs off
density of applied herbicide = 1.0 g/ml

RUNOFF:

0.2 x 0.5 pt/acre x 0.47 L/pt x 0.616 x 2.47
x 10^{-4} acre/m^2 x 10 mL/L x 3 m^2 = 0.02 mL

RECEIVING WATER:

Static stream,
Dimensions: 0.15 x 1 x 5 m = 0.75 m^3 (volume)

DILUTION:

0.02 mL into 0.75 m3 = 0.03 mL/m^3
0.03 mL/ m^3 x 10^{-3} m /L x 10^3 mg/g x 1 g/ml = <u>0.03 mg/L</u>

The calculations presented above illustrate that the probable immediate post—runoff concentrations of TBEE in static water bodies will be in the sub-parts per million range. At maximum application rates (2 pts/acre), these concentrations would range from about 0.1 to 5.2 mg/L. The concentrations for the worst exposure scenario (#1) are greater than (7x) the 96 hour LC5O concentrations for freshwater fish; those

for the other scenario are almost an order of magnitude less. The no effect level for TBEE with juvenile Coho salmon is ≤1.0 mg/L (122). Therefore, under the worst exposure scenario with the maximum application rate of herbicide, the 96 hour LC5O could be exceeded. Under other, less extreme conditions at average application rates, predicted concentrations of the active ingredient would be substantially less than the reported no effect level in Coho salmon. The persistence characteristics of TBEE are such that the ester form of Triclopyr would not likely persist in surface waters for longer than a couple of days, except in those waters in Massachusetts which are acidic where the ester may persist for up to several months. It is also very unlikely that rainbow trout would be impacted at application rates of 0.5 pts/acre based on the reasonable scenario (#2) which predicts water concentrations of Garlon 4 less than toxic concentrations.

The following factors would also tend to reduce the exposure concentrations that fish would experience: flowing waters would provide greater dilution than assumed for static conditions; the Massachusetts Right-of-Way Management Act mandates an application setback of 10 feet from standing or flowing waters or from wetlands (33 CMR 1l.04:(l) and (4) (a)); and actual runoff of the applied herbicide would probably be less than used for these sample calculations. Scenario 1 represents an extremely unlikely event where 20% of all the herbicide applied to an acre runs off into a small water course. The conditions which would foster this type of runoff across setbacks (i.e. heavy rains) would tend to turn static stream systems into flowing water courses and hence increase dilution.

The application rate used in the previous non—target species assessment (June 23, 1990) was 0.5 pints per acre applied basally. The utilities involved in managing rights-of-way and the manufacturer of Garlon 4 have since indicated that the required application rate may range as high as 2-3 quarts of Garlon 4 per acre for effective control of vegetation. The following addition to the exposure assessment examines the resultant changes in the predicted exposure concentrations that might occur in freshwater fish habitats when Garlon 4 is applied at the 2-3 quarts /acre rate.

The change in the application rate will result in the following differences in predicted exposure concentrations from those originally predicted for 0.5 pts/acre:

2 at/acre x 2pt/ qt = x 8 0.5 pt/acre

3at/acre x 2pt/qt = x 12 0.5 pt/acre

Application rates will therefore be 8-12 times greater than for the 0.5 pts/acre case. The probable concentrations in water after runoff as previously predicted were 1.3 (Scenario 1) and 0.03 mg/L (Scenario 2) ing butoxyethyl ester of Triclopyr / L. These concentrations would therefore range from 0.24 — 15.6 ing/L for application rates between two and six quarts.

These predicted concentrations encompass and substantially exceed the reported LCSO concentrations for fish (in range of 0.7 - 1.3 mg/L and the NOEL of 1 mg/L for juvenile Coho salmon. The more realistic exposure scenario (#2) predicts exposure concentrations of the same order of magnitude as the LC5O values.

Given that the higher application rates required for vegetation control in some areas have the potential to produce potentially lethal concentrations of the butoxyethyl ester of Triclopyr to fish in water as a result of runoff, a setback greater than the mandated 10 feet from standing or flowing waters (333 CMR 11.04: (1) and (4) (a)) will provide an additional level of protection when application rates exceed 0.5 pts/acre.

SUMMARY

Triclopyr exhibits moderate mobility in most of the soils tested. Soils with higher organic carbon content would be expected to retard the mobility of Triclopyr. Trichloropyridinol, the major breakdown product, is less mobile than Triclopyr.

Microbial degradation is the primary mechanism by which Triclopyr is degraded in soils. Degradation rates are variable and appear to be dependent on the soil and climatic conditions. In Massachusetts conditions, Triclopyr can be expected to have moderate persistence when applied in warm weather (late spring —early fall), and slightly longer persistence in colder weather.713 mg/kg. Rabbits and guinea pigs have oral LDSOs of 550 and 310 mg/kg respectively. The target organ for Triclopyr is in the liver. The only positive result in the oncogenicity studies was an increase in the combined incidence of mammary adenomas and adenocarcinoinas in the female rats at the high dose. Mutagenicity tests were negative. The developmental NOEL was reported as 75 mg/kg/d with a slight increase in maternal mortality. Using EPA's carcinogen classification scheme, Triclopyr may be considered a group C carcinogen (possible human carcinogen: limited animal evidence).

RECOMMENDATION

The herbicide Garlon 4, containing the butoxyethyl ester of Triclopyr (EPA Reg. No. 464-554), is recommended for use in sensitive areas only at application rates of 0.5 pt/acre pursuant to 333 CMR 11.00. Applications at rates up to three quarts per acre are permitted with a setback of 50 feet from standing or flowing waters suitable for fish habitat. The set back restriction may be waived upon demonstration to both the Departments of Food and Agriculture and Environmental Protection that runoff concentrations from applications of Garlon 4 with setbacks less than 50 feet do not pose a threat to fish.

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Summary of Aminopyralid Toxicity and Fate for Application to Sensitive Areas of Rights-of-Way

The following summary addresses use of the herbicide aminopyralid in Sensitive Areas of Rights-of-Way in Massachusetts. The review was jointly conducted by the Massachusetts Department of Environmental Protection (MassDEP) Office of Research and Standards (ORS) and the Massachusetts Department of Agricultural Resources (DAR) in accordance with the cooperative agreement issued between the two agencies in 1987 and updated in 2011 pursuant to the provisions of Section 4(1)(E) of 333 CMR 11.00 Rights-of-Way Management Regulations.

The conclusions summarized in this memo are based upon several sources of information, including a comprehensive review of this herbicide by the USDA Forest Service (Durkin 2007), scientific documents contained in the US Environmental Protection Agency (EPA) docket of information for aminopyralid to support pesticide registration decisions and the results of literature searches for recent pertinent studies on this chemical. As aminopyralid is a relatively new product, very little primary information was found in the literature that was pertinent to the scope of this review and therefore the review was primarily based on information provided by the secondary summary documents described above. The purpose of this review is to ascertain the suitability of this product for use within sensitive areas of rights-of-way, based upon consideration of available information on the potential toxicity of the active ingredient aminopyralid as well as its fate and transport in the environment.

Aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-2-pyridine carboxylic acid) is a pyridine carboxylic acid herbicide manufactured by Dow AgroSciences LLC (DAS) for use in controlling annual and perennial broadleaf weeds. At the time of this active ingredient review, two end-use products containing aminopyralid were requested: Milestone (EPA Reg. No. 62719-519) and OpenSight (EPA Reg. No. 62719-597). Additional details on the evaluation of the products can be found in separate review documents.[1]

Aminopyralid is structurally similar to other pyridine carboxylic acid herbicides that preceded it in development, including clopyralid, picloram and triclopyr. Technical grade picloram and clopyralid contain the carcinogen hexachlorobenzene as well as other carcinogenic chlorinated benzenes as impurities that are byproducts of their synthesis process. According to DAS, the manufacturing process for aminopyralid does not produce these byproducts (John Jachetta, DAS product manager for aminopyralid as cited in Durkin, 2007). EPA has labeled aminopyralid a “reduced risk pesticide” that has a favorable human health toxicity profile when compared to the registered alternatives, because it has a lower application rate, which should alleviate the need for repeat applications and thus result in a lower overall amount used.

Similar to other pyridine carboxylic acids, aminopyralid is a synthetic analogue of an auxin, a plant hormone that regulates development, growth and other plant functions. Though the specific mode of action of these compounds is not fully known, they produce effects on the plant including alterations in

[1] Product review of Milestone Herbicide; Product Review of Opensight Herbicide

cell wall elasticity and gene expression, and non-productive tissue growth that results in leaf curl and disruption of the plant phloem, interfering with transport of nutrients and causing death in days to weeks.

Summary of fate and transport:

Aminopyralid is generally very persistent in the environment. Under favorable light conditions, it can rapidly photodegrade in shallow, clear water (though not in murky deeper water), with a half-life of 0.6 days. It photodegrades slowly in soil, with a half-life of about 72.2 days. It is stable to microbial degradation in sediment and water systems. In aerobic soils, it is metabolized at a moderate rate depending on the type of soil, with a half-life range of about 31.5 days to 193 days in eight soils[2]. It is expected to be stable in anaerobic soils (USEPA, 2014).

Under environmental conditions and pH, 99.9% of aminopyralid will dissociate to its anionic form, which contributes to its high solubility, lack of volatility and very low adsorption to soils. As a result, aminopyralid partitions to water and is expected to have high mobility in most soils. The major route of dissipation of aminopyralid from soil is through runoff and leaching.

Once aminopyralid enters surface water, any residue that is not subject to photolysis will persist and be mobile in aquatic environments. Aquatic field dissipation studies in treated ponds showed half-lives in the range of 10.8 to 14.6 days. Any part of aminopyralid applied to terrestrial vegetation that reaches the soil has a high potential to run off into surface water or leach into the soil profile and groundwater. Once aminopyralid reaches anaerobic depths in soil, degradation will dramatically slow and only its high mobility will determine the rate at which it will contaminate groundwater. Field dissipation in bare ground studies showed dissipation half-lives in the range of 9 to 54 days and leaching depths in the range of 6 to 36 inches. The potential for groundwater contamination with aminopyralid is expected to be higher in areas with shallow groundwater (because there is less depth to travel before reaching groundwater) or when rain occurs soon after application. Additional information on the expected concentrations in surface water and groundwater following the terrestrial applications in rights-of-way is available in the companion document to this review.

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[2] Recent assessments by USEPA (2014) and the European Union (EFSA, 2013) provide updated information for aerobic soil metabolism and soil binding parameter values of aminopyralid. USEPA (2014) considered the data from eight soils. The soil half-life values ranged from 31 to 193 days, with an average of 103.7 days. The soil-water partitioning constant (K_D) values ranged from 0.03 to 0.29 mL/g for soils with pH values of 6.1 to 7.8; K_D values of acid soils were in the range of 0.15 to 0.72 mL/g. The K_{OC} values for soils with near-neutral pH values were in the range of 1.05 to 7.54 mL/g and for acidic soils the values were in the range of 19.95 to 24.3 mL/g. In general, K_{OC}-values increase with decreasing pH. USEPA (2014) indicated that these data on soil half-life and soil binding (soil-water distribution coefficient data) are acceptable for use in exposure modeling and risk assessment.
In addition to the USEPA assessment, aquatic exposure modeling conducted as part of a European risk assessment (EFSA, 2013) was reviewed to provide additional data and information. The model input value for soil half-life geometric mean of 54.8 days was lower than the values used in the SERA risk assessment (Durkin, 2007) and the values used by USEPA. The model input value for soil binding parameter (mean $K_{F,OC}$ of 6.64 mL/g) was within the range of values used in the other modeling efforts reviewed above.

The only potentially major degradation products of aminopyralid are formed during aqueous photolysis and include two small amino acid analogs, i.e., malonamic acid and oxamic acid, along with four unidentified acid amides of 2-3 carbons in length. EPA concluded that neither of the two identified compounds would be of concern as they are expected to be readily metabolized following uptake and/or rapidly excreted without any significant biological effects. In addition, none of these compounds are expected to be produced to any great extent as aqueous photolysis only occurs up to the depth that sunlight penetrates a water body. Only carbon dioxide and some non-extractable residues were found in amounts over 10% of the applied study residue in all other laboratory degradation studies of aminopyralid, at maximums of 76.2% in aerobic soil metabolism and 15% in aerobic aquatic metabolism.

Summary of Toxicity and Risk Assessment:

Available toxicity information reviewed by the secondary sources cited above all indicate that aminopyralid at environmentally relevant concentrations has low potential toxicity to humans, as well as terrestrial animals and aquatic organisms. This finding is consistent with its mode of action, which is specific to plant biology. A number of systemic mammalian studies as well as aquatic ecotoxicity studies indicate that exposure concentrations of aminopyralid associated with herbicide applications are well below concentrations of concern for these receptors.

In terms of mammalian effects, the weight of evidence indicates that aminopyralid does not produce significant systemic effects. The effects most often seen following exposure to aminopyralid are on the gastrointestinal tract after oral exposure, with cecal effects in rats and stomach effects in dogs and rabbits. In rats, the typical effect is cecal enlargement. Given that cecal enlargement is typically seen with poorly absorbed osmotically active compounds, this effect is categorized by a number of investigators as an adaptive change and/or not toxicologically significant. The significance of cecal effects to humans, which only have a vestigial trace of this organ, is also unclear. The USDA Forest Service considers the effects on the gastrointestinal system as portal of entry effects. The differences in effects are attributed to differences in species anatomy and methods of exposure (i.e., gavage vs. dietary). Another somewhat notable effect in mammals includes the results of an acute oral toxicity study in rats in which bilateral cloudiness and lacrimation of eyes was seen in all rats after one day but not on subsequent days. Cloudiness of eyes is an unusual effect that has not been seen in any other aminopyralid study. The significance of these findings is unclear. Finally, in one developmental study, incoordination in several adult female rabbits was noted but this effect was rapidly reversible.

EPA developed a chronic Reference Dose (RfD) of 0.5 mg a.e.[3]/kg/day for aminopyralid for the general population derived based on a No Observed Adverse Effect Level (NOAEL) of 50 mg a.e./kg/day from a 24-month feeding study in rats. The endpoint, increase in cecal weights at 500 mg a.e./kg/day, may have very little relevance to potential effects in humans. However, the RfD is based on the most sensitive effect for the most sensitive species from the available database for aminopyralid. EPA also derived a Human Health Benchmark for Pesticide (HHBP) concentration of 3500 ug/L (ppb) from this chronic RfD

[3] Because aminopyralid dissociates from its acid form to its anionic form in the environment, aminopyralid application rates and concentrations are reported as “acid equivalents” (a.e.), instead of “active ingredients” (a.i.) because the acid part of the active ingredient salt is the herbicidally active component.

based upon a 70 kg adult who drinks 2 L/day of water and incorporating a Relative Source Contribution (RSC) factor of 20%.

For short-term/intermediate exposures, EPA developed an acute RfD of 1.0 mg a.e./kg/day derived based on a NOAEL of 104 mg a.e./kg/day from a developmental gavage study in rabbits in which decreased maternal food consumption and body weight as well as spontaneous abortion (in one rabbit) and decreased fetal weights were seen at higher doses.

A comparison of predicted short and long-term exposure to aminopyralid following application indicates that exposures are substantially below the above acute and chronic criteria.

Though the potential for aminopyralid to contaminate groundwater is high due to aminopyralid's high solubility and prolonged half-life in soil, both EPA and the U.S. Forest Service concluded that predicted short and long-term concentrations of aminopyralid in groundwater are substantially below concentrations of health concern for people using groundwater as a source of drinking water.

In terms of ecological effects, it appears that birds are more sensitive to aminopyralid administered through gavage than dietary exposure. A series of ecological benchmark toxicity concentrations were developed by both EPA and the US Forest Service for various terrestrial and aquatic wildlife. Though there were some differences in some of these values between the two agencies, the evaluations conducted by both agencies point to the same conclusion, that there is no indication from the available data that aminopyralid will adversely affect mammals, birds, fish, aquatic and terrestrial invertebrates, terrestrial microorganisms and amphibians.

A couple of ecological data gaps remain in the data submitted by the manufacturer of this compound to the U.S. Environmental Protection Agency (USEPA). These include a cyanobacteria growth study, an early life stage study in fathead minnows and an invertebrate lifecycle study in mysid shrimp. Additional information on data that are needed to address uncertainties in risk assessments is available in documents that were issued with the Registration Review of aminopyralid. The Registration Review of aminopyralid was initiated in 2013 and is scheduled to be completed in 2020. Information and notices related to this review will be available in the docket (USEPA, 2013).

An additional quantitative comparison of modeled concentrations of aminopyralid in surface water and groundwater following land application in rights-of-way areas was done by DAR to available ecological and human health benchmarks. This analysis indicated that projected water concentrations resulting from application of aminopyralid are well below concentrations of concern for ecological receptors in surface water as well as for humans who use these waters as sources of drinking water. For additional details on this evaluation as well as on the modeling conducted, please see the companion document to this review, entitled "Exposure Assessment of Aminopyralid in Surface and Ground Water: Review of Modeling Input Parameter, Refined Modeling and Comparison with Benchmarks."

Plants:

Aminopyralid's auxinic mode of action renders it toxic to all terrestrial (dicot) broadleaf plants. It is generally not toxic to terrestrial (monocot) grasses. While aquatic macrophytes have been shown to be more sensitive to aminopyralid than aquatic organisms, this herbicide is generally not toxic to aquatic macrophytes and algae.

Given that aminopyralid has an auxinic mode of action that can affect all terrestrial broadleaf plants, the potential impact to non-target broadleaf plants, particularly plants that are endangered species, is seen as the greatest concern for this herbicide. In addition, effects on non-target plants that might not be endangered species but which might serve as a food source for endangered animal species would be of concern.

An important consideration with this compound is that aminopyralid ingested by animals in grasses and other vegetation is excreted largely unchanged. As has been found with two of its predecessor compounds, (i.e., clopyralid, and picloram), use of manure from domesticated animals (that have ingested aminopyralid-treated grasses and vegetation) as compost in gardens can have detrimental effects to sensitive broadleaf plants, including plants in the nightshade family such as potatoes, tomatoes, and legumes. The aminopyralid product label warns that manure from animals that have grazed on aminopyralid-treated vegetation within the previous three days should not be used on land used for growing susceptible broadleaf plants. The three-day warning refers to the time it takes for consumed vegetation containing aminopyralid residues to pass through grazing animals. While this warning does not directly apply to application of aminopyralid on rangeland, it should be considered in scenarios where there is the potential for range vegetation to enter the garden compost stream.

Conclusions/Recommendations:

The information contained in the secondary documents from both EPA and the US Forest Service that were reviewed for this evaluation consistently present the same profile and conclusions on the toxicity, fate and transport of this herbicide. No conflicting information was identified in the literature. In addition, supplemental modeling conducted by DAR for this review consistently point to the same conclusions as those reached by EPA, the US Forest Service and others. Modeled concentrations of aminopyralid in environmental media following application as specified in product labels are well below toxicity levels of concern for humans, as well as terrestrial and aquatic wildlife.

Sensitive non-target plant species have been identified as the organisms of concern. Given that herbicides are designed to control plants, this is not surprising. This information, coupled with the fact that aminopyralid is very mobile and persistent in the environment strongly suggests that application of aminopyralid should be targeted as much as possible to avoid impacts on non-target plants. Measures that minimize drift should be used in applying this product. In addition, as with any application, a preliminary field survey should be conducted prior to application to identify any plants on the endangered species list and/or any other plant species that are important to that ecosystem.

Based upon the available database for aminopyralid, use of this herbicide in sensitive areas of rights-of-ways should be acceptable if it is applied in a manner that is consistent with the product label, the above recommendations and the Massachusetts Sensitive Areas of Rights-of-Way Regulations.

Reference:

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Exposure Assessment of Aminopyralid in Surface and Ground Water: Review of Modeling Input Parameter, Refined Modeling and Comparison with Benchmarks

1. Introduction

Aquatic exposure modeling has been used to estimate aminopyralid residue concentrations in surface water and ground water to support human health and ecological risk assessments. The USDA Forest Service document, "Aminopyralid-Human Health and Ecological Risk Assessment-FINAL REPORT", prepared by Syracuse Environmental Research Associates, Inc. (SERA) (Durkin 2007) describes the modeling that was used to estimate the concentrations of aminopyralid that may occur in surface and ground water. The risk assessment also reviews environmental fate input parameters and summarizes results from other modeling efforts conducted by USEPA and DOW AgroSciences (DAS).

The present document reviews these modeling data and also provides the results of additional modeling conducted by DAR, utilizing more recent modeling information and environmental fate input parameters, to complement and refine existing modeling results. All of these modeled concentrations in surface and ground water were assessed by comparing them to benchmark toxicity values for aquatic life and human health established by USEPA.

2. Review of Modeling Data in SERA Risk Assessment

The SERA risk assessment (Durkin 2007) notes that modeling results are sensitive to the input parameter value for soil half-life. The range of input values for aerobic soil metabolism half-life used in the various modeling efforts is related to the limitations and uncertainty in the data that were available for this parameter at the time modeling was conducted. SERA used a slightly higher value for half-life time of 343 days compared to 310.5 days by USEPA. The value used by USEPA was based on a single study result of 103.5 days. USEPA multiplied that half-life value by 3 to account for the uncertainty associated with using only a single study result.

SERA notes that the soil binding parameter (i.e., soil-water partitioning coefficients K_{OC} and K_D) is variable and not closely related to organic carbon content of the soil. Model input values for this parameter used in GLEAMS modeling were refined by using specific values associated with the type of soil. Values used for K_{OC} ranged from 0.87 in clay to 8.91 mL/g in loam; K_D values ranged from 0.39 in sand to 0.63 mL/g in clay. The parameter values used in modeling by USEPA was K_D of 0.03 mL/g and DOW AgroSciences used a K_{OC} value of 0.81mL/g.

The input parameter values used in the modeling described in SERA were considered to be the most conservative and resulted in the highest estimates for concentrations in surface water. The modeling results for selected scenarios that are most representative for Massachusetts are

included in Table 1 for comparison with other modeling results. The SERA report notes that the central estimate for surface water exposure based on GLEAMS modeling is similar to the value estimated by USEPA based on the PRZM/EXAMS modeling. The GLEAMS modeling data were the basis for the concentrations used in the SERA risk assessment.

SERA did not conduct modeling of concentrations in groundwater, but considered groundwater modeling results from USEPA and DAS (see also Table 2). The drinking water exposure assessment described by SERA is based on modeling results for surface water. As noted in SERA, modeling results for concentrations in surface water are higher than modeling results in groundwater.

3. Recent Information Related to Environmental Fate Characteristics and Model Input Values

As noted in the section above, the model input values for soil half-life and soil binding were found to be important parameters in modeling of aquatic exposure. Recent assessments by USEPA (2014A) and the European Union (EFSA, 2013) provide updated information for these properties of aminopyralid.

USEPA (2014A) considered the data from eight soils. The soil half-life values ranged from 31 to 193 days, with an average of 103.7 days. The K_D values ranged from 0.03 to 0.29 mL/g for soils with pH values of 6.1 to 7.8; K_D values of acid soils were in the range of 0.15 to 0.72 mL/g. The K_{OC} values for soils with near-neutral pH values were in the range of 1.05 to 7.54 mL/g and for acidic soils the values were in the range of 19.95 to 24.3 mL/g. In general, K_{OC} values increase with decreasing pH. USEPA (2014A) indicated that these data on soil half-life and soil binding (soil-water distribution coefficient data) are acceptable for use in exposure modeling and risk assessment.

In addition to the USEPA assessment, aquatic exposure modeling conducted as part of a European risk assessment (EFSA, 2013) was reviewed to provide additional data and information. The model input value for soil half-life geometric mean of 54.8 days was lower than the values used in the SERA risk assessment and the values used by USEPA. The model input value for soil binding parameter (mean K_{FOC} of 6.64 mL/g) was within the range of values used in the other modeling efforts reviewed above. The EFSA modeling results are included in Table 1.

Consideration of the data from the recent USEPA and EFSA assessments indicates that the input parameter values used in the GLEAMS modeling described in the SERA risk assessment were conservative values. In the refined modeling described below, DAR considered the recent information with the selection of input parameter values.

4. Additional Aquatic Exposure Modeling

For the purpose of this review, DAR conducted additional modeling using updated input parameter values to complement the existing data with refined exposure modeling results. The modeling conducted by DAR was done with recently released EPA water exposure models (see Appendix 1 and 2.

The model input parameter values for soil half-life and soil binding were based on the environmental fate information and data provided in the recent assessment by USEPA (2014A). The average value for soil half-life of 103.5 day and the lowest value for soil binding parameter K_D of 0.03 mL/g were used for model input. The application rate was the maximum labeled rate of 0.11 lbs of aminopyralid per acre. For surface water modeling, the watershed scenarios modeled were the EPA standard pond, the EPA index reservoir and a custom small pond scenario. Further details on model input can be found in Appendix 1.

The results of DAR modeling are presented below and compared with the modeling data summarized in the SERA risk assessment (Durkin, 2007) and EFSA (2013).

4.1. Surface Water Modeling

Additional modeling of surface water concentrations was conducted to complement the existing modeling data that were generated with EPA standard scenarios using modeling data that are more representative for Massachusetts ROW. The model scenario that was developed for surface water exposure assessment of herbicide components in ROW areas (Wijnja, 2010), was used in the modeling here with the latest version of the EPA surface water exposure model (see Appendix 1). The latest version of the EPA surface water exposure model also allows the modeling of a custom watershed scenario. For the purpose of this assessment, DAR developed a custom small pond scenario. More detailed information on the model input and modeling results can be found in Appendix 1.

The modeled surface water concentrations are summarized and compared with other modeling results in Table 1. To facilitate comparison of modeling results, results from other modeling were scaled, if necessary, to the value representative of an application rate of 0.11 lbs/acre.

The modeling results generated with the MA-specific ROW scenario by DAR show the highest concentrations for the custom small pond scenario. These higher concentrations are attributed to the smaller dimensions of the watershed, including a shallower pond, compared to the EPA standard pond and reservoir.

Comparison of the most conservative refined modeling results (ROW scenario and custom small pond) with the concentrations used in the SERA risk assessment indicate that the results are similar to the central values used in SERA risk assessment.

The results for the MA-specific ROW scenario with standard pond and index reservoir watersheds are lower than the concentration generated by EPA modeling for the same type of watersheds. This is likely the result of difference in the land use scenarios (ROW versus range land or a generic scenario) and weather input data. The results for the ROW scenario and custom small pond watershed resulted in higher concentrations compared to the EPA standard pond and EPA Index Reservoir water bodies.

Table 1. Modeling results for surface water concentrations of aminopyralid. The results are representative of an application rate of 0.11 lbs/acre.

Agency/Org.	Model/Scenario	Concentration (µg/L or ppb)		Source/Notes
		Peak	Longer-term	
DAR	MA ROW scenario with:			
	SWCC, EPA Standard Pond	0.612	0.477	Appendix 1A
	SWCC, EPA Index Reservoir	1.93	1.45	Appendix 1B
	SWCC, Custom Small Pond	12.1	3.32	Appendix 1C
SERA				Durkin, 2007:
	GLEAMS Standard, Pond	3.34 - 14.3	2.21 - 7.76	Table 6; 50 inch rainfall and rate of 0.11 lbs/acre
	GLEAMS-Driver, Pond	8.8 - 34.1	4.4 – 19.8	Table 9, 10; average rainfall and for rate of 0.11 lbs/acre
EPA				Durkin, 2007:
	PRZM/EXAMS, Reservoir	10.01	1.936	Table 11, rate of 0.11 lbs/acre
	GENEEC, EPA Standard Pond	6.38	5.39	″
DOW				Durkin, 2007:
	GENEEC	6.16	3.96	Table 11; rate of 0.11 lbs/acre
				″
SERA	Conc. used for Risk Assess.			Durkin, 2007:
	Central	11	4.4	Table 12, rate of 0.11 lbs/acre
	Lower	0.23	0.11	″
	Upper	66.0	28.6	″
EFSA				EFSA, 2013: Annex A
	FOCUS Step 1	20.4	20.1	Screening-level Assessment
	FOCUS Step 3	0.052	0.049	Late Spring Application, Pond D4 Scenario
	FOCUS Step 3	0.332	0.042	Late Spring Application, Stream Scenario D4

DAR modeling with ROW-scenario also evaluated the sensitivity of the results for the input value of the soil aerobic metabolism half-life. The model results did not change significantly for simulations with a soil aerobic metabolism half-life of 310.5 d compared to 103.5 d (Table 1 in Appendices 1A, 1B and 1C). The 310.5 d value was used in earlier modeling by EPA (see Section 2); the value of 103.5 d was more recently recommended for use in risk assessment (see Section 3).

Modeling data generated by the European EFSA agency show screening-level assessment concentrations that are higher than the DAR custom pond values, but concentrations for specific scenarios are lower than modeling results for all other scenarios included in Table 1.

4.2. Groundwater modeling results

Additional groundwater modeling was conducted with EPA models SCIGROW and PRZM-GW (Water Models | Pesticides | US EPA: http://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/about-water-exposure-models-used-pesticide).

SCI-GROW (Screening Concentration in Groundwater) as a screening-level tool to estimate drinking water exposure concentrations in groundwater resulting from pesticide use. As a screening tool, SCI-GROW provides conservative estimates of pesticides in groundwater. It is a generic model that provides peak estimates of compound concentrations in groundwater based on a given application rate, number of applications, and standard environmental fate parameters of soil aerobic half-life and soil binding constant.

The PRZM-GW (Pesticide Root Zone Model – Ground Water) model has the capability to consider variability in leaching potential of different soils, weather (including rainfall), cumulative yearly applications or depth to aquifer. The conceptual model is based on a rural drinking water well beneath an agricultural field (a high pesticide use area), which draws water from an unconfined, high water-table aquifer. Processes included in the conceptual model that influence pesticide transport through the soil profile include water flow, chemical specific dissipation and transportation parameters (i.e., degradation and sorption), and crop specific factors, including transpiration, pesticide interception and management practices.

Six different scenarios were developed for the PRZM-GW model. The modeling for the review presented here used was based on the Delmarva Sweet Corn - Evesboro Loamy Sand scenario. Delmarva Peninsula sweet corn scenario is one of the six PRZM-GW standard scenarios that fall within regions where groundwater is highly susceptible to nitrate contamination. The six scenarios are expected to provide reasonable upper bound estimates for pesticide concentrations for vulnerable groundwater sources (USEPA, 2015).

The Delmarva Corn scenario most closely represents the Virginia Coastal Plain spatially and characteristically. In the Delmarva Corn scenario, the vadose zone ends and the aquifer begins 9 meters (29.5 feet) below the land surface. It has been reported that 26 of 29 Virginia Coastal Plain counties have at least one domestic well with a depth to the bottom of the well screen of 30 feet or less. Using this example, it follows that modeling with PRZM-GW provides estimated drinking water concentrations (EDWCs) that represent a subset of a broadly distributed population relying on shallow, private drinking water wells.

The scenario characteristics for vegetation were adjusted to be representative of ROW vegetation. Weather input data were representative for Eastern Massachusetts. This model simulation can be considered to be representative of behavior at a vulnerable site given the loamy sand soil profile and the absence of a buffer zone around the well.

Details on the SCI-GROW and PRZM-GW modeling can be found in Appendices 2A and 2B. The modeling results are summarized in Table 2 and compared with the other ground water modeling data.

Table 2. Comparison of groundwater modeling results for concentrations of aminopyralid for maximum application rate of 0.11 lbs/acre.

Agency/Org.	Model/Scenario	Concentration (µg/L or ppb)		Source/Notes
		Peak	Longer-term	
DAR	SCIGROW	5.17		Appendix 2A ; K_{OC}:1.05; soil half-life: 103.5 d
	PRZM-GW	12.6	10.5	Appendix 2B; K_{OC}:1.05; soil half-life: 103.5 d
EPA				Durkin, 2007: Table 11
	SCI-GROW	0.627		Application rate of 0.11 lbs/acre; K_{OC}: 1.05; soil half-life: 38.7 d
DOW				Durkin, 2007:
	SCI-GROW	1.65		Table 11, for application rate of 0.11 lbs/A; K_{OC} of 7.1 and soil half-life of 88.6 d
	SCI-GROW	0.121		Rate: 0.11 lbs/acre; K_{OC} of 7.1; soil half-life of 30 d
				″
EFSA				EFSA, 2013: Annex A
	FOCUS PEARL	0.116		Annual application of 0.053 lbs ai/acre; field dissipation half-life of 14.1 d; K_{foC}: 5.14 mL/g

Modeling results from DAR show the highest concentrations due to the use of conservative values for soil adsorption constant and soil half-life input parameters. These input values are the most recent values that EPA recommends for use in risk assessment (see section 3).

It should be noted that the soil defined in the Delmarva Sweet Corn - Evesboro Loamy Sand scenario represents a sandy soil profile with relatively low organic matter content. Such a soil profile is considered to favor leaching of substances into the profile. In the model scenario, the soil is definedto have low organic matter (highest is 0.52 % organic carbon in top layers and 0.1 – 0.20 % in deeper soil layers). Percentage of sand in the soil layers is greater than 90 % and clay content is between 2 and 5%. These soil particle size distributions are similar to values for sandy soils that occur in southeastern Massachusetts and Cape Cod. For example, the Carver soils are sandy soils with clay content of 1 to 5 % and organic matter content in the ranges of 0.1 – 1.0 %. (Soil Survey for Barnstable County: http://nesoil.com/barnstable/index.htm).

4.3. Groundwater Monitoring Data

The ground water modeling results can further be evaluated by considering results from monitoring studies. At the time of this review, two studies were located that were publicly available (online) that included aminopyralid as a target analyte.

A groundwater monitoring study conducted in Wyoming by the US Geological Survey (USGS) included aminopyralid as a target analyte. Aminopyralid was not detected (Eddy-Miller et al., 2013).

In a monitoring study in the Bitterroot Valley, MT, aminopyralid was detected at a level of 0.1 µg/L in one of 46 samples from 23 wells (Schmidt and Mulder, 2009).

USGS pesticide use data indicate that there was substantial use of this herbicide in both Montana and Wyoming (Fig. 1).

These monitoring study results show low detection frequencies of aminopyralid in areas where this herbicide was used. When detected, the level was much lower than the ground water modeling data presented in section 4.2.

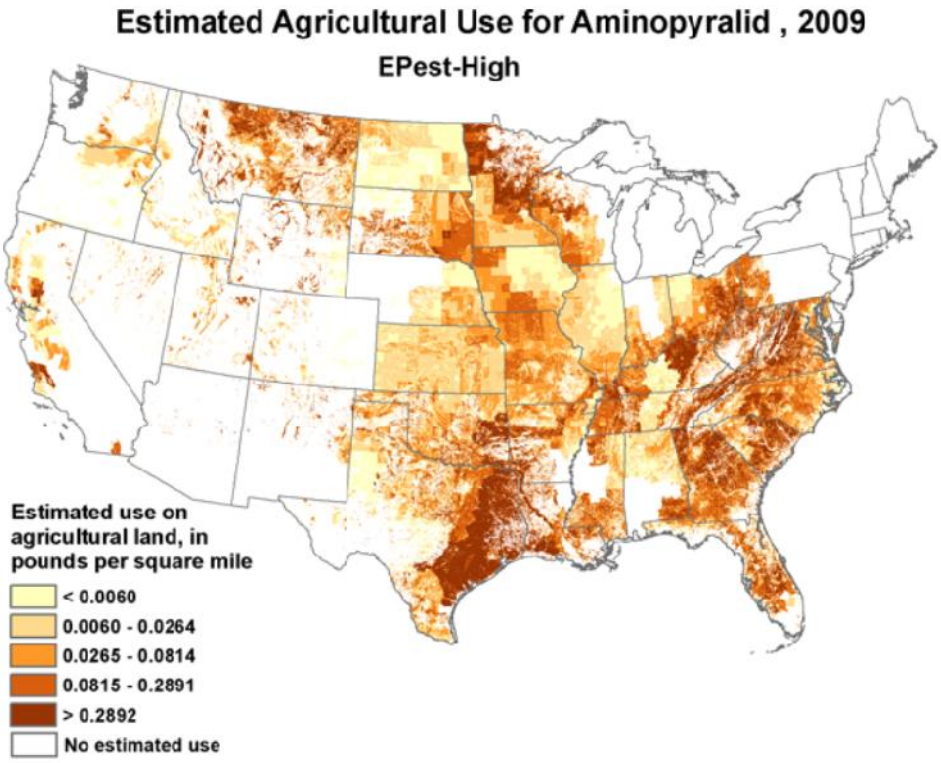

Figure 1 Estimated Agricultural use of Aminopyralid in the US during 2009. Accessed at: USGS NAWQA: The Pesticide National Synthesis Project

5. Comparison of Modeled Concentrations with Aquatic Life and Human Health Benchmarks

EPA developed benchmarks that can assist with the assessment of monitoring and modeling data. Surface water modeling data were compared with aquatic life bench mark to assess the potential for ecological effects in aquatic systems.

Comparison of modeled surface water concentrations with Aquatic Life Benchmarks for Aminopyralid (Table 3) can be helpful to assess risk to aquatic life (USEPA, 2014B). Comparison of the modeled concentrations in Table 1 (DAR data for peak 0.612 – 12.1 μg/L and chronic 0.477 to 3.32 μg/L) with the benchmarks in Table 3 shows levels well below benchmark values. This comparison indicates minimal risk to aquatic life.

Table 3. Aquatic life benchmarks for aminopyralid

Species	Acute (µg/L or ppb)	Chronic (µg/L or ppb)
Fish	>5,000	1360
Invertebrates	>49,300	10200
Non-vascular plants	18,000	
Vascular plants	>88,000	

Comparison of the modeled concentrations with human health benchmark values for aminopyralid can further assist with assessment of potential for human health effects.

The chronic or life-time human health benchmark (HHBM) value for aminopyralid is 3500 ppb (US EPA, 2014C). An acute HHBM value has not been established. The EPA risk assessment notes that aminopyralid is of low acute toxicity and therefore no acute reference dose was identified for any population.

Comparison of the modeled aminopyralid concentrations in groundwater and the HHBM indicates that there is no concern for effects on human health from drinking water containing residues of aminopyralid following application per label specifications..

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Appendix 1A: Summary of Water Modeling of Aminopyralid and the USEPA Standard Pond

Estimated Environmental Concentrations for aminopyralid are presented in Table 1 for the USEPA standard pond with the RightOfWay_MA_PAX field scenario. A graphical presentation of the year-to-year peaks is presented in Figure 1. These values were generated with the Surface Water Concentration Calculator (SWCC Version 1.106) (Water Models | Pesticides | US EPA)[1]. The SWCC model estimates pesticide concentrations in water bodies that result from pesticide applications to land. The SWCC is designed to simulate the environmental concentration of a pesticide in the water column and sediment and is used for regulatory purposes by the USEPA Office of Pesticide Programs (OPP). The SWCC uses PRZM version 5.0+ (PRZM5) and the Variable Volume Water Body Model (VVWM), replacing the older PE5 shell (last updated November 2006), which used PRZM3 and EXAMS.

Critical input values for the model are summarized in Tables 2 and 3. This model estimates that about 1.1% of aminopyralid applied to the field eventually reaches the water body. The main mechanism of transport from the field to the water body is by runoff (53.3% of the total transport) followed by spray drift (46.7%).

In the water body, pesticide dissipates with an effective water column half-life of 68.2 days. (This value does not include dissipation by transport to the benthic region; it includes only processes that result in removal of pesticide from the complete system.) The main source of dissipation in the water column is photolysis (effective average half-life = 71 days) followed by metabolism (1744.3 days) and volatilization (1.866018E+10 days).

In the benthic region, pesticide dissipation is negligible (1744.3 days). The main source of dissipation in the benthic region is metabolism (effective average half-life = 1744.3 days). The vast majority of the pesticide in the benthic region (92.5%) is in the pore water rather than sorbed to sediment.

Table 1. Estimated Environmental Concentrations (ppb) for aminopyralid.

	Soil half-life 103.5 d	Soil half-life 310.5 d
Peak (1-in-10 yr)	0.610	0.612
4-day Avg (1-in-10 yr)	0.596	0.598
21-day Avg (1-in-10 yr)	0.552	0.553
60-day Avg (1-in-10 yr)	0.476	0.477

[1] USEPA Water Models Pesticides: http://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/about-water-exposure-models-used-pesticide

365-day Avg (1-in-10 yr)	0.145	0.146
Entire Simulation Mean	0.726E-01	0.727E-01

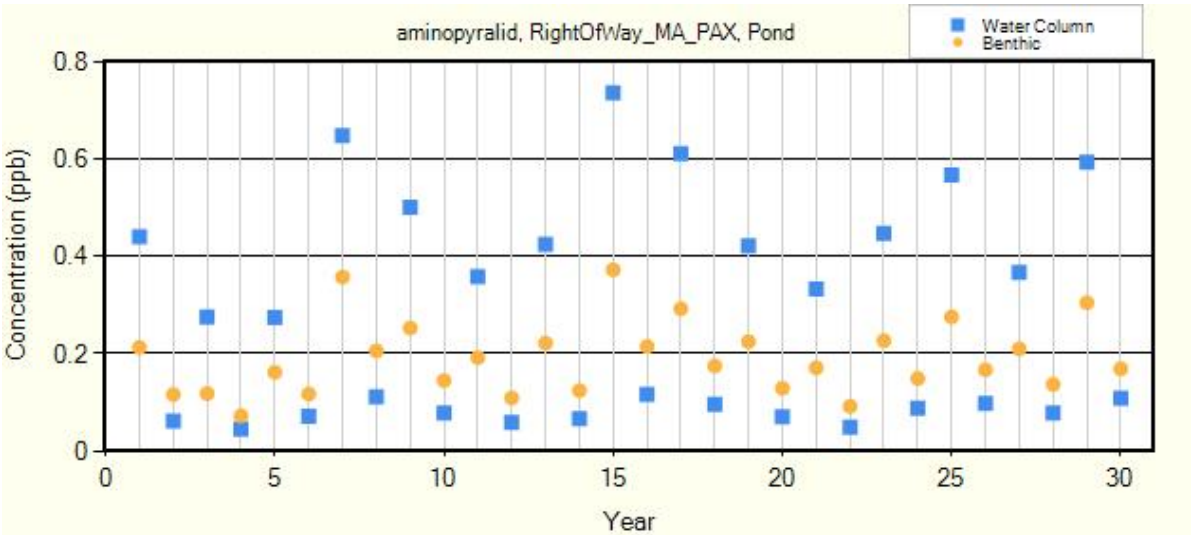
Table 2. Summary of Model Inputs for aminopyralid.

Scenario	RightOfWay_MA_PAX
Cropped Area Fraction	1
K_D (ml/g)	0.03
Water Half-Life (days) @ 20 °C	1073.6
Benthic Half-Life (days) @ 20 °C	1073.6
Photolysis Half-Life (days) @ 42 °Lat	0.6
Hydrolysis Half-Life (days)	0
Soil Half-Life (days) @ 20 °C	103.5
Foliar Half-Life (days)	
Molecular Wt	207
Vapor Pressure (torr)	7.4e-11
Solubility (mg/l)	2480

Table 3. Application Schedule for aminopyralid (every two years)

Date (Mon/Day)	Type	Amount (kg/ha)	Eff.	Drift
07/01	Foliar	0.11	0.95	0.05

Figure 1. Yearly Peak Concentrations


aminopyralid, RightOfWay_MA_PAX, Pond
Water Column
Benthic
Concentration (ppb)
0.8
0.6
0.4
0.2
0
0
5
10
15
20
25
30
Year

Appendix 1B: Summary of Water Modeling of aminopyralid and the USEPA Standard Reservoir

Estimated Environmental Concentrations for aminopyralid are presented in Table 1 for the USEPA standard reservoir with the RightOfWay_MA_PAX field scenario. A graphical presentation of the year-to-year peaks is presented in Figure 1. These values were generated with the Surface Water Concentration Calculator (SWCC Version 1.106). Critical input values for the model are summarized in Tables 2 and 3.

This model estimates that about 0.72% of aminopyralid applied to the field eventually reaches the water body. The main mechanism of transport from the field to the water body is by runoff (78.9% of the total transport) followed by spray drift (21.1%).

In the water body, pesticide dissipates with an effective water column half-life of 53.4 days. (This value does not include dissipation by transport to the benthic region; it includes only processes that result in removal of pesticide from the complete system.) The main source of dissipation in the water column is photolysis (effective average half-life = 97.3 days) followed by washout (126.8 days), metabolism (1744.3 days), and volatilization (2.556444E+10 days).

In the benthic region, pesticide dissipation is negligible (1744.3 days). The main source of dissipation in the benthic region is metabolism (effective average half-life = 1744.3 days). The vast majority of the pesticide in the benthic region (92.5%) is in the pore water rather than adsorbed to sediment.

Table 1. Estimated Environmental Concentrations (ppb) for aminopyralid.

	Soil Half-life 103.5 d	Soil Half-life 310.5 d
Peak (1-in-10 yr)	1.11	1.11
4-day Avg (1-in-10 yr)	1.08	1.08
21-day Avg (1-in-10 yr)	0.985	0.989
60-day Avg (1-in-10 yr)	0.792	0.794
365-day Avg (1-in-10 yr)	0.223	0.224
Entire Simulation Mean	0.938E-01	0.941E-01

Table 2. Summary of Model Inputs for aminopyralid.

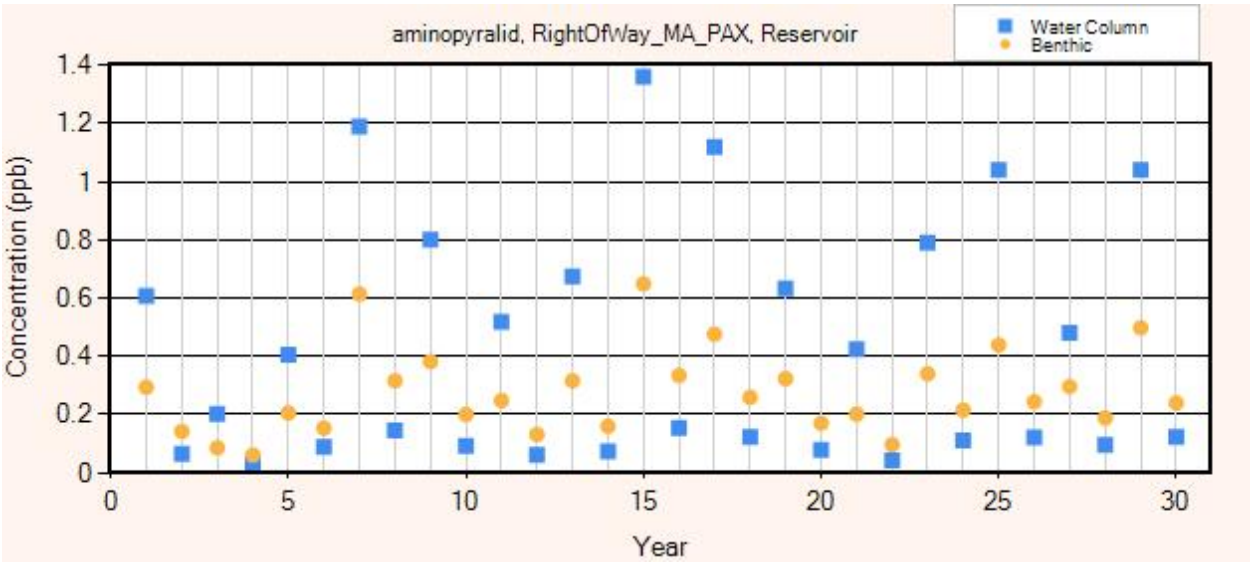
Scenario	RightOfWay_MA_PAX
Cropped Area Fraction	1.0
K_D (ml/g)	0.03

Water Half-Life (days) @ 20 °C	1073.6
Benthic Half-Life (days) @ 20 °C	1073.6
Photolysis Half-Life (days) @ 42 °Lat	0.6
Hydrolysis Half-Life (days)	0
Soil Half-Life (days) @ 20 °C	103.5
Foliar Half-Life (days)	
Molecular Wt	207
Vapor Pressure (torr)	7.4e-11
Solubility (mg/l)	2480

Table 3. Application Schedule for aminopyralid (every two years)

Date (Mon/Day)	Type	Amount (kg/ha)	Eff.	Drift
07/01	Foliar	0.11	0.95	0.05

Figure 1. Yearly Peak Concentrations



Appendix 1C: Summary of Water Modeling of aminopyralid in a Custom Small Pond Scenario

Estimated Environmental Concentrations for aminopyralid are presented in Table 1 for the custom small pond with the RightOfWay_MA_PAX field scenario. A graphical presentation of the year-to-year peaks is presented in Figure 1. These values were generated with the Surface Water Concentration Calculator (SWCC Version 1.106). Critical input values for the model are summarized in Tables 2 and 3.

The custom watershed characteristics were made to be more representative of a ROW scenario by considering a smaller catchment area-to-pond area/volume; it was adapted from the TOXSWA scenario: http://www.pesticidemodels.eu/toxswa/eu-registration . The depth of the pond was chosen to be 0.33 m initial depth and 0.67 m maximum depth. The applications occurred every two years.

This model estimates that about 0.62% of aminopyralid applied to the field eventually reaches the water body. The main mechanism of transport from the field to the water body is by runoff (96.8% of the total transport) followed by spray drift (3.24%).

In the water body, pesticide dissipates with an effective water column half-life of 11.6 days. (This value does not include dissipation by transport to the benthic region; it includes only processes that result in removal of pesticide from the complete system.) The main source of dissipation in the water column is photolysis (effective average half-life = 11.7 days) followed by metabolism (1744.3 days) and volatilization (3.078929E+09 days).

In the benthic region, pesticide dissipation is negligible (1744.3 days). The main source of dissipation in the benthic region is metabolism (effective average half-life = 1744.3 days). The vast majority of the pesticide in the benthic region (92.5%) is in the pore water rather than sorbed to sediment.

Table 1. Estimated Environmental Concentrations (ppb) for aminopyralid.

	Soil Half-life 103.5 d	Soil Half-life 310.5 d
Peak (1-in-10 yr)	12.2	12.3
4-day Avg (1-in-10 yr)	10.6	10.7
21-day Avg (1-in-10 yr)	6.63	6.66
60-day Avg (1-in-10 yr)	3.46	3.47
365-day Avg (1-in-10 yr)	0.598	0.600
Entire Simulation Mean	0.218	0.219

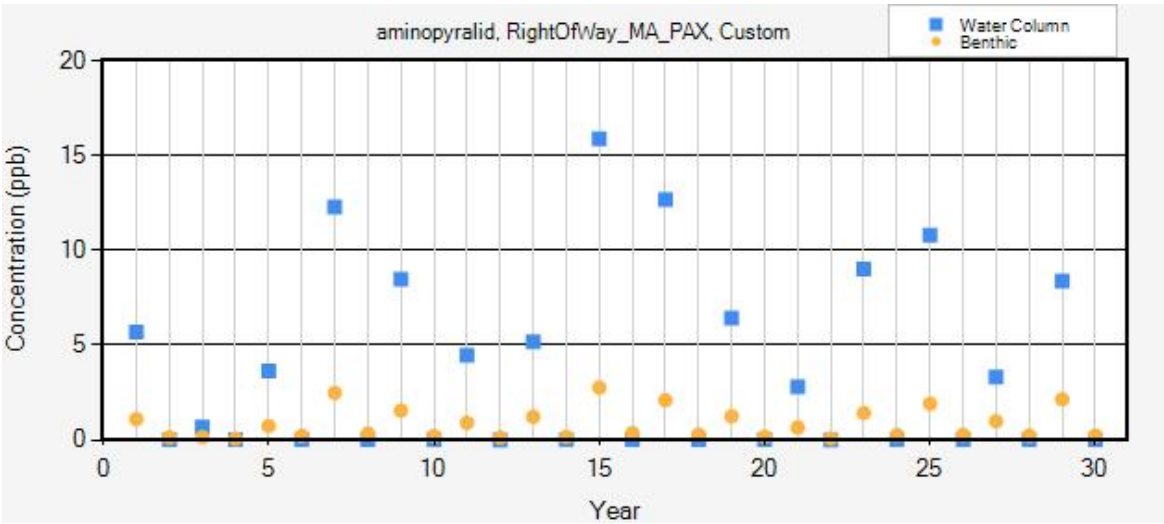
Table 2. Summary of Model Inputs for aminopyralid.

Scenario	RightOfWay_MA_PAX
Cropped Area Fraction	1.0
K_d (ml/g)	0.03
Water Half-Life (days) @ 20 °C	1073.6
Benthic Half-Life (days) @ 20 °C	1073.6
Photolysis Half-Life (days) @ 42 °Lat	0.6
Hydrolysis Half-Life (days)	0
Soil Half-Life (days) @ 20 °C	103.5
Foliar Half-Life (days)	
Molecular Wt	207
Vapor Pressure (torr)	7.4e-11
Solubility (mg/l)	2480

Table 3. Application Schedule for aminopyralid (every two years)

Date (Mon/Day)	Type	Amount (kg/ha)	Eff.	Drift
07/01	Foliar	0.11	0.99	0.01

Figure 1. Yearly Peak Concentrations



Appendix 2A: Groundwater Modeling with SCIGROW

SCI-GROW (Screening Concentration in Groundwater) is a screening-level tool to estimate drinking water exposure concentrations in groundwater resulting from pesticide use. As a screening tool, SCI-GROW provides conservative estimates of pesticides in groundwater. It is a generic model that provides peak estimates of compound concentrations in groundwater based on a given application rate, number of applications, and standard environmental fate parameters of soil aerobic half-life and soil binding constant. SCI-GROW is an empirical model based on a linear best fit through 13 single-application groundwater studies. These studies were typically two to three year studies. SCI-GROW is a screening level risk assessment tool that has been used to evaluate the effect of pesticide use on groundwater. More information on the SCI-GROW model is available at EPA website for water models: Water Models | Pesticides | US EPA [2]

Model input and output is given below.

```
SCIGROW

                    VERSION 2.3
        ENVIRONMENTAL FATE AND EFFECTS DIVISION
             OFFICE OF PESTICIDE PROGRAMS
         U.S. ENVIRONMENTAL PROTECTION AGENCY
                    SCREENING MODEL
            FOR AQUATIC PESTICIDE EXPOSURE


 SciGrow version 2.3
 chemical:Aminopyralid
 time is  2/20/2015  12: 4:28
 ----------------------------------------------------------------------
  Application      Number of       Total Use    Koc      Soil Aerobic
  rate (lb/acre)  applications   (lb/acre/yr)  (ml/g)   metabolism (days)
 ----------------------------------------------------------------------
      0.110           1.0           0.110      1.05E+00      103.5
 ----------------------------------------------------------------------
 groundwater screening cond (ppb) =   5.17E+00
 **********************************************************************
```

[2] USEPA Water Models: http://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/about-water-exposure-models-used-pesticide

Appendix 2B: Groundwater Modeling with PRZM-GW model

Analysis for Aminopyralid and the DELMARVA Sweet Corn - Evesboro Loamy Sand Scenario in the PRZM-GW model system

PRZM-GW (Pesticide Root Zone Model – Ground Water) was developed as the harmonized tool for assessing pesticide concentrations in groundwater. This model has the capability to consider variability in leaching potential of different soils, weather (including rainfall), cumulative yearly applications or depth to aquifer. The conceptual model is based on a rural drinking water well beneath an agricultural field (a high pesticide use area), which draws water from an unconfined, high water-table aquifer. Processes included in the conceptual model that influence pesticide transport through the soil profile include water flow, chemical specific dissipation and transportation parameters (i.e., degradation and sorption), and crop specific factors, including transpiration, pesticide interception and management practices.

Six different scenarios were developed for the PRZM-GW model. The modeling for the review presented here was based on the Delmarva Sweet Corn - Evesboro Loamy Sand scenario. Delmarva Peninsula sweet corn scenario is one of the six PRZM-GW standard scenarios that fall within regions where groundwater is highly susceptible to nitrate contamination. The six scenarios are expected to provide reasonable upper bound estimates for pesticide concentrations for vulnerable groundwater sources (USEPA, 2015)[3].

The Delmarva Corn scenario most closely represents the Virginia Coastal Plain spatially and characteristically. In the Delmarva Corn scenario, the vadose zone ends and the aquifer begins 9 meters (29.5 feet) below the land surface. It has been reported that 26 of 29 Virginia Coastal Plain counties have at least one domestic well with a depth to the bottom of the well screen of 30 feet or less. Using this example, it follows that modeling with PRZM-GW provides estimated drinking water concentrations (EDWCs) that represent a subset of a broadly distributed population relying on shallow, private drinking water wells.

Weather data were representative of Eastern Massachusetts and scenario characteristics for vegetation were adjusted to be representative of ROW vegetation. Vegetation height, root zone depth were set at values that were used in ROW model scenario used of surface water modeling (Wijnja, 2010). Model simulation can be considered to be representative of behavior at a

[3] USEPA, 2015.Implementation of the Pesticide Root Zone Model Groundwater (PRZM-GW) for Use in EPA's Pesticide Exposure Assessments. USEPA, Office of Pesticide Program, Environmental Fate and Effects Division (EFED), September 8, 2015. Accessed at: http://www.epa.gov/sites/production/files/2015-11/documents/attachment_1_-_implementation_report_of_przm-gw_final.pdf

vulnerable site given the loamy sand soil profile and the absence of a buffer zone around the well.

Estimated groundwater concentrations and breakthrough times for aminopyralid are presented in Table 1 for the DELMARVA sweet corn - Evesboro loamy sand groundwater scenario. A graphical presentation of the daily concentrations in the aquifer is presented in Figure 1. These values were generated with the PRZM-GW (Version 1.07). Critical input values for the model are summarized in Tables 2 and 3.

Table 1. Groundwater Results for aminopyralid and the DELMARVA sweet corn - Evesboro loamy sand Scenario for ROW in Massachusetts

	Soil half-life 103.5 d	Soil half-life 310.5 d
Peak Concentration (ppb)	12.6	19.6
Post-Breakthrough Mean Concentration (ppb)	10.5	15.8
Entire Simulation Mean Concentration (ppb)	7.52	11.3
Average Breakthrough Time (days)	3013.025	3013.025
Throughputs	3.63754	3.63754

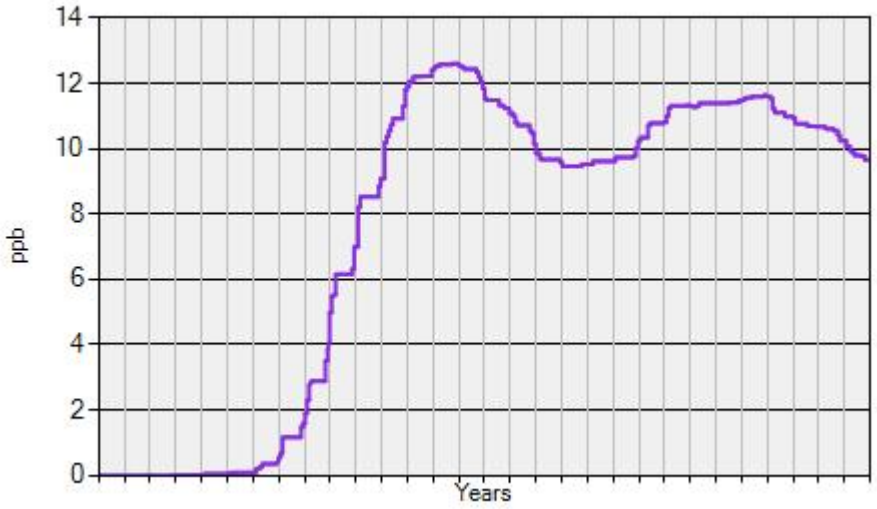
Table 2. Chemical Properties for Groundwater Modeling of aminopyralid.

Koc (ml/g)	1.05
Surface Soil Half Life (days)	103.5 (310.5)
Hydrolysis Half Life (days)	0
Diffusion Coefficint Air (cm2/day)	0.0
Henry's Constant	0.0
Enthalpy (kcal/mol)	0.0

Table 3. Pesticide application scheme used for aminopyralid. This application scheme was applied once every 2 years of the simulation.

Application Date (Month/Day)	Application Method	Application Rate (kg/ha)
07/01	Above canopy application	0.11

Figure 1. Aquifer Breakthrough Curve for aminopyralid and the DELMARVA Sweet Corn - Evesboro Loamy Sand Scenario. Groundwater depth is 10 m and application of 0.11 lbs/acre occur every 2 years. Results shown are for simulation with soil half-life of 103.5 d.



APPENDIX 10

NATIONAL GRID ENVIRONMENTAL POLICY

nationalgrid

Environment Policy

Our strategy is to be a recognised leader in the development and operation of safe, reliable and sustainable energy systems to meet the needs of our customers and communities and to generate value for our investors.

One of the ways we will achieve this is to protect and enhance the environment, always seeking new and innovative ways to lighten the environmental impact of our past, present and future activities.

J. Pettigrew.

John Pettigrew
Chief Executive

We commit to:

- Ensuring environmental sustainability is considered in our decision making and creating a sustainable thinking culture.
- Using resources more efficiently through good design, using sustainable materials, responsibly refurbishing existing assets, recovery and recycling.
- Ensuring our operations that have an impact on natural habitats are conducted in a manner to protect biodiversity and seeking ways to enhance the natural value of the area for the benefit of local communities and/or environment.
- Reducing greenhouse gas emissions: 45% by 2020 and 80% by 2050.
- Looking at ways to reduce the impact of climate change by implementing mitigation and adaptation measures.
- Openly reporting on our environmental and sustainability performance with employees, members of the public and other stakeholders.
- Actively working to prevent pollution which may result from our activities.
- Continually improving our environmental management system to protect the environment, reduce the risk of environmental incidents.
- Satisfying our compliance obligations.
- Actively managing the risks associated with sites where we have responsibility for dealing with contamination associated with past operations.
  :nsuring our employees have the training, skills, knowledge and resources necessary to meet our environmental commitments.
- Working with governments and regulators to help them develop and deliver more effective environmental policies and targets.
- Helping consumers reduce their dependency on fossil fuels by providing them with access to more sustainable energy and through innovative energy efficiency programmes.
- Ensuring those working on our behalf demonstrate the same commitment to the environment as we do.

For more details on this policy, visit the SSR Infonet homepage or nationalgrid.com