Massachusetts

2012 Right-of-Way
Yearly Operational Plan

nationalgrid

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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”) 2012 program for managing vegetation with herbicides on the included rights-of-way. This program and YOP has been developed in compliance with 333 CMR 11.00, Rights-of-way Management regulations administered by the Massachusetts Department of Agricultural Resources (DAR).

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 forty-five day public review and comment period which starts when DAR publishes a notice in the Environmental Monitor, a twenty-one 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:

http://www.nationalgridus.com/non_html/National_Grid_VMP_2009-2013.pdf

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 2012 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 2009-2013 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 3-5 year 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 2012

The rights-of-way proposed for herbicide treatments in 2012 are listed in Appendix 2 and the rights-of-way listed to facilitate “touch up” on segments treated in 2011 are listed in Appendix 3. The municipalities, through which they pass, are listed in two tables in Appendix 4, one for the municipalities for 2012 lines and one for the municipalities for 2011 “touch-up” lines (some municipalities are listed in both tables).

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 creates a well-balanced program that reduces the negative impact on non-target organisms while controlling target 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 undesirable vegetation (for example, mowing, hand-cutting 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 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 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 economic, agricultural, social and recreational uses affect the IVM management techniques applied 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 2012 have target 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 target 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 twelve 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 2 feet in height are not treated.

3. Non sprouting conifers taller than 2 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 5).

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 non-target, 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 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. The other targets, in compliance with the New England Power Pool (NEPOOL) Vegetation Management Standards, are 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 target species will be removed or controlled during a treatment operation. Within the cleared width of the right-of-way, all tree 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 fifteen 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 are 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 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 targets, in fact, most species are not targets. Desirable plant species that provide the natural controls in our IVM program (where they don't interfere with NEPOOL requirements) 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 desirable species and undesirable target species refer to Appendix 6.

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 zones and treatment restrictions within these borders based on the sensitivity of each site.

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 5 includes diagrams and a table detailing these conditions. Treatment in limited spray areas requires the use of Commonwealth of Massachusetts recommended herbicides for use in *sensitive areas* and application restriction—pursuant to 333 CMR 11.04 (1)(d)—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 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. DAR, 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 forty-five day YOP and twenty-one 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. 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 DAR) in consultation with the Department of Environmental Protection and the Right-of-way Advisory Panel, made a determination that utilities may treat target 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 RIGHT-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 insure 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 7 and herbicide fact sheets developed and/or approved by DAR are in Appendix 8.

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
Accord Concentrate*	Glyphosate	62719-324	2-5%	16-128 oz.
Rodeo**	Glyphosate	62719-324	2-5%	16-128 oz.
Krenite S*	Fosamine	352-395	6-10%	32-128 oz.
Escort XP	Metsulfuron-Methyl	352-439	2-4 oz.	0.125-0.8 oz.
Arsenal or Polaris***	Imazapyr	241-346 241-346-228	0.125%-0.5%	2-8 oz.
Arsenal Powerline	Imazapyr	241-431	0.125%-0.5%	2-8 oz.
Induce or Aqua Fac or other equivalent surfactant****	not applicable	not applicable	0.125%-1%	1-16 oz.
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

Table 2: Tank Mixes for Cut Stump Treatment (CST) Applications

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. Water)	Estimated Application Rate of Active Ingredient Per Acre
Accord Concentrate*	Glyphosate	62719-324	40%-50%	Per density of target stems
Rodeo**	Glyphosate	62719-324	40%-50%	Per density of target stems
Arsenal or Polaris***	Imazapyr	241-346 241-346-228	3%-5% (mixed with Accord Concentrate)	Per density of target stems
Arsenal Powerline	Imazapyr	241-431	3%-5% (mixed with Accord Concentrate)	Per density of target stems

Carriers: Water or Windshield Washing Fluid	not applicable	not applicable	not applicable	not applicable

* Accord Concentrate or Krenite S are most often applied in combination with Escort and Arsenal.

** Accord Concentrate is in the process of being replaced by Rodeo.

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

**** 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.

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	Triclopyr	62719-40	15%-30%	0.5-3 pints
Garlon 4 Ultra	Triclopyr	62719-527	15%-30%	0.5-3 pints
Carrier: Arborchem's low odor basal oil or equivalent	not applicable	not applicable	70%-85&	24-144 oz.

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:

Dawn Travalini,
Lead Vegetation Strategy Specialist
40 Sylvan Road
Waltham, MA 02451
Phone: 781-907-2448

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, liaison between National Grid and landowners, 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 foresters. National Grid's Transmission Foresters are:

Anne-Marie Moran
Manager, T&D Forestry, NE
939 Southbridge Street
Worcester, MA 01610
(508) 860-6925

Mariclaire Rigby
Senior Forester
40 Sylvan Road
Waltham, MA 02451
(781) 907-2442

Jason Magoon
Senior Forester
939 Southbridge Street
Worcester, MA 01610
(508) 860-6212

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 will perform herbicide applications on National Grid's rights-of-way:

- Vegetation Control Service, Inc.
  342 Main Street
  Athol, MA 01331
  (603) 526-4122

- Lewis Tree Service, Inc
  300 Lucius Gordon Drive
  West Henrietta, NY 14586
  (585) 436-3208

- Asplundh Tree Expert Company
  15 Pleasant Harbour Road
  Plymouth, MA 02360
  (508) 326-4127

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
Material Safety Data Sheets (MSDS)
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 4: Herbicide Manufacturers

Manufacturer	Telephone Number	Special Instructions
BASF Corporation	(800) 832-4357	
Dow Agro Sciences	(800) 992-5994	
E.I. du Pont de Nemours and Co.	(800) 441-3637	Medical Emergencies
Monsanto	(314) 694-4000	
NuFarm	(877) 325-1840	Medical Emergencies

Table 5: State Agencies

State Agency	Telephone Number	Special Instructions
DAR, Pesticide Bureau	(617) 626-1700	A.S.A.P. (within 48 hours)
Massachusetts Department of Environmental Protection, Emergency Response Section	Emergency Response Coordinator: (617) 292-5507	For emergencies involving reportable quantities of hazardous materials, call within 2 hours. <u>Required info:</u> City/town, street address, site name (if applicable), material, quantity released, environment impact
	Southeast Region: (508) 946-2700	
	Northeast Region: (978) 694-3200	
	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 6: 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 7: National Grid contacts in the case of a spill or accident

Name	Telephone Number	Address
Mariclaire Rigby	(781) 907-2442	National Grid 40 Sylvan Road Waltham, MA 02451
Jason Magoon	(508) 860-6212	National Grid 939 Southbridge Street Worcester, MA 01610
Anne-Marie Moran	(508) 860-6925	National Grid 939 Southbridge Street Worcester, MA 01610

Table 8: Remedial Plan to Address Spills

REPORTABLE SPILLS (Spills of reportable quantity of material):
FOLLOW STEPS 1-11

NON-REPORTABLE SPILLS: FOLLOW STEPS 1,2,3,4,7,8,&,9 and contact the National Grid Transmission Forester.

Order	ACTION		Done (√)
1	Use any and all PPE as directed by product label or MSDS.		
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 DAR, Pesticide Bureau	(617) 626-1700	
	Massachusetts Department of Environmental Protection, Emergency Response Section (appropriate district)	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 7)	
	2		
	3		
	ChemTrec	(800) 424-9300	
	Additional emergency personnel		
	If there is a doubt as to who should be notified, contact Massachusetts State Police.	(617) 566-4500 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 1oo 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

bordering on

the ocean
any estuary
any creek
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 2012

Rights-of-Way Proposed for Treatment in 2012

Row Number	Line Name	Line Number	Towns
1205	Brayton Point - Norton T/L	303	Rehoboth, Dighton, Swansea, Somerset
1233	Tewksbury Sub. to Billerica/Burlington T/L	338	Tewksbury, Billerica
1253	Pratts Junction to Sandy Pond Sub.	343	Sterling, Lancaster, Shirley, Ayer
1441	Adams Sub. to Lanesboro Sub.	F132	Adams, Cheshire, Lanesborough
1443	Tap to Golden Rock Sub.	G133 Tap	Methuen
1455	New Hampshire S/L to Fitchburg Switch	I135/J136	Winchendon, Ashburnham, Westminster, Fitchburg
1457	Fitchburg Switch to Pratts Junction	I135/J136	Fitchburg, Leominster
1459	East Winchendon Tap	J136 TAP	Winchendon
1461	Ayer Taps	K137/J138 TAP	Ayer
1465	338 ROW to Billerica Sub.	M139 TAP	Billerica
1475	Millbury #2 - RI S/L	Q143/R144	Millbury, Sutton, Northbridge, Uxbridge, Millville
1477	Whitins Pond Tap	Q143 TAP	Northbridge, Uxbridge
1478	Uxbridge Tap	Q143 TAP	Uxbridge
1493	Northboro Road - Framingham T/L	D156	Southborough
1513	L'Energia Tap	J162 TAP	Lowell
1515	Tewksbury to Perry Street Sub. Lowell	J162 TAP	Lowell, Tewksbury
1581	303 ROW - Mink Street	E183/F184	Seekonk, Swansea, Somerset
1585	Mink St. - Read St.	F184	Attleboro, Seekonk
1623	Massachusetts S/L to #4 Station	D4	Shelburne, Colrain, Leydon
1625	#4 Station to #2 Station and #3 Station Tap	E5/F6	Shelburne, Conway
1627	#2 Station to Connecticut River	E5/F6	Shelburne, Conway, Deerfield
1629	Ware - CT River	E5/F6	Sunderland, Leverett, Shutesbury, Pelham, Belchertown, Ware
1631	Meadow St. - Ware	E5/F6	West Brookfield, North Brookfield, East Brookfield, Spencer
1633	Meadow Street Sub. to Millbury #1	E5/F6	Spencer, Leicester, Auburn, Millbury
1685	Ayer to 326 ROW & 326 ROW to Dunstable Sub.	O42/R43	Dunstable, Groton, Ayer
4001	Carpenter Hill - Snow St	W-123/U-173	Charlton, Southbridge
4007	Pepperell Paper Tap	O42	Pepperell, Dunstable
4011	Bridgewater - Dupont & Auburn	E20/F19/G18	Brockton, West Bridgewater, Bridgewater
4018	Berkley T/L - Bridgewater	V5/U6/S8	Bridgewater, Raynham, Taunton, Berkley
4027	East Weymouth - Randolph	Randolph 1&2	Randolph, Holbrook, Weymouth, Hingham
4030	East Weymouth - North Weymouth	2422/2423	Weymouth
4068	Whitman St - Washington St	93W43	Hanson
4205	South St (South Marlboro Sub) - Pole 9 Bringham Rd.	310W3/317W1	Marlborough
4210	Robinson Ave - Cumberland Engineering	2246	Attleboro
4260	West St - Norton	2276	Allteboro, Norton
4262	Norton - Elm St.	4L2	Norton
4330	Wrentham - Dedham St.	2285/2286	Wrentham
5180	Ward Hill Sub. To Bradford Sub. To N. Haverhill	2354-56	Haverhill
5240	Meadowbrook Sub. to Quebec Street Sub.	2381 & 16L2	Lowell, Chelmsford
5250	Meadowbrook Sub. to Billerica Sub. & NE Nuc	2383-84	Chelmsford, Billerica
5260	Tewksbury Sub. to Wiggonville Sub.	2385 & 307	Lowell, Tewksbury
5430	Tewksbury Sub #22 to Tewksbury #14 (Main St.)	314 & 317	Tewksbury
5510	Tewksbury Sub. to Trull Street Sub.	1306-16	Tewksbury

6020	Elliot Street Beverly to North Beverly Sub.	2318	Beverly
7510	Blackstone Shops tap	26W2	Millbury
7540	Chaffins - Rutland	34 Feeder	Holden
7710	Erving Paper Tap	705-W1	Wendell
7720	Farley Feeder	705-W3	Wendell
8320	Zylonite Sub. to Columbia Street Sub.	1002-1003	Adams
8330	Adams Street Sub. to Columbia St. Sub. & Rt 8	1002	Adams
8340	Adams Sub. to Brown Street Sub.	1004	North Adams
8350	Brown Street Sub. to Adams Sub.	1005	North Adams, Adams
8380	Mt Greylock Tap	1021W2	Adams
		D-406L2	Oxford, Auburn
		D-26W3	Auburn, Millbury, Oxford
		D-552L1	Spencer, Leicester, Charlton, North Brookfield
		D-413L1	Southbridge
		D-219W5	Leominster
		D-216W2	Clinton
		D-207W2	Leominster
		D-207W6	Leominster
		D-412L2	Webster
		D-412L4	Webster, Dudley
		D-412L6	Webster, Dudley, Oxford
		D-602W2	Westminster, Gardner, Hubbardston, Barre
		D-602W3	Westminster
		D-3J341	Worcester
		D-9J307	Worcester
		D-6J356	Worcester
		D-6J312	Worcester
		D-1J362	Worcester
		D-11J314	Worcester
		D-4J348	Worcester
		D-4J339	Worcester

APPENDIX 3

RIGHTS-OF-WAY TREATED IN 2011

Rights-of-Way Treated in 2011

Row Number	*Line Name*	*Line Number*	*Towns*
1201	Ludlow T/L - Carpenter Hill	301	Belchertown, Palmer, Brimfield, Warren, Brookfield, Sturbridge, Charlton
1203	Carpenter Hill - Millbury #3	302	Charlton, Oxford, Auburn, Millbury, Sutton
1209	So. Wrentham - W. Medway	303	Medway, Bellingham, Franklin, Wrentham
1273	Ward Hill Sub. to Boxford Junction	394	Haverhill, Boxford
1275	Boxford Junction to King Street Sub.	394	Boxford, Groveland, Georgetown
1423	Webster Street Tap	A127/B128 TAP	Auburn, Leicester, Worcester
1431	Depot Street Taps	C129/D130 TAP	Milford
1491	Boxford Junction to Salem Harbor	B154/C155	Middleton, North Reading, Peabody, Danvers, Salem
1531	Millbury #2 - 302 ROW	V174	Sutton, Millbury
1533	301 ROW - Palmer	W175	Palmer, Monson, Brimfield
1535	Palmer - 301 & O15 ROW	X176	Palmer
1588	North River Sub. to East Beverly Sub.	M191	Salem, Beverly
1681	Fitch Rd. (Clinton) - 343 ROW	M39	West Boylston, Sterling, Lancaster, Clinton
1683	Pratts Jct. - Fitch Rd. (Clinton)	N40	Sterling, Lancaster, Clinton
1694	Marlborough - 1523 ROW	G7 & W23W	Marlborough, Southborough
2004	2028 ROW - Berkley T/L	V5/U6/S8	Dighton, Swansea
2026	Jct X3/K15 - Jct V5/U6	T7	Swansea
2028	Hathaway - Montaup	Z1/Y2/X3/W4/V5	Fall River, Somerset, Swansea
2030	Jct Z1/Y2 - Swansea	X3/W4	Swansea, Somerset
2037	Massachusetts S/L - 2036 ROW	P11-R9	Attleboro

Row Number	Line Name	Line Number	Towns
4008	Auburn St. Sub - U2 Jct.	A94	Stoughton, Avon, Holbrook, Brockton, Abington, Whitman
4010	Ames St #911 - Dupont #91	D911	Brockton
4015	Belmont - A94 Jct	U2	Stoughton, Easton, Brockton
4017	A94 Jct - Stoughton	U2	Stoughton
4019	E20 ROW - Belmont	S1	Brockton, West Bridgewater
4046	Hudson - Grove St.	91W43	Brockton
4056	M1 - Hayward St	912W21	Bridgewater
4230	West St. - Clara St.	2248 & 24	Attleboro
4240	Teknor Apex Tap	2248 Tap	Seekonk
4250	West St - Plainville	2274	Plainville, North Attleborough, Attleboro
4270	West St sub - Freeman St. & Mansfield Tap	2278	Attleboro, Norton, Mansfield
4440	Uxbridge - Depot St Sub	7U/8U/321W10 & 6	Uxbridge, Mendon, Hopedale, Milford
5020	North St. - Chandler Rd.	8T2	Andover
5160	Methuen Sub. to New Hampshire S/L	2352-76	Methuen
5170	Spicket River Tap to New Hampshire S/L	2376	Haverhill, Methuen
5190	Methuen #5 to S. Broadway Sub.	2355	Methuen, Lawrence
5220	King Street Sub. to Rowley Ipswitch T/L	2373-94	Groveland, Georgetown, Rowley
5420	Wiggonville Sub to Quebec & Blossom Street Sub	309-313-318	Lowell
5520	339 ROW - Andover #3	1323 & 59L2/L4	Tewksbury, Andover

Row Number	***Line Name***	***Line Number***	***Towns***
6040	I-95 to Topsfield Sub. Route 1 to Route 97	2365-68	Boxford, Topsfield
6050	Burrill St - Railyard #49	2370-72	Salem, Swampscott
6060	Green Street Lynn to Marblehead T/L	2372	Lynn, Swampscott
7210	Fiskdale - Snow St.	413L5/L6	Sturbridge, Southbridge
7440	Litchfield Street Sub. to Lincoln Terr.	207W2-W4	Leominster
7460	Prospect St to Mead St.	219-W3	Leominster
7470	N Leominster to W Leominster	219-W4	Leominster
7480	West Leominster Sub to Litchfield Sub	219-W4	Leominster
7610	Ryan St to West St	601W1	Gardner
8030	Palmer - Shearers Corner	504	Palmer, Monson
8031	Palmer - Springfield Rd	507	Palmer, Monson
8040	Coy Hill	501L1	Ware, West Brookfield
8370	Harbor Rd to South St.	1021W1-W2	Cheshire
8420	Great Barrington Sub. to Sheffield Sub.	1106	Great Barrington, Sheffield
8430	Swamp Rd. to Tanglewood	1103W1	West Stockbridge, Richmond, Lenox
8440	East St. - Lenox Depot	1103W2	Lenox

APPENDIX 4

LIST OF MUNICIPALITIES FOR NOTIFICATION IN 2012

(INCLUDES 2012 MUNICIPALITIES AND

2011 POTENTIAL “TOUCH UP” MUNICIPALITIES)

2012 Municipalities		
Adams	Hanson	Rehoboth
Ashburnham	Haverhill	Seekonk
Attleboro	Hingham	Shelburne
Auburn	Holbrook	Shirley
Ayer	Holden	Shutesbury
Barre	Hubbardston	Somerset
Belchertown	Lancaster	Southborough
Berkley	Lanesborough	Southbridge
Beverly	Leicester	Spencer
Billerica	Leominster	Sterling
Bridgewater	Leverett	Sunderland
Brockton	Leydon	Sutton
Charlton	Lowell	Swansea
Chelmsford	Marlborough	Taunton
Cheshire	Methuen	Tewksbury
Clinton	Millbury	Uxbridge
Colrain	Millville	Ware
Conway	North Adams	Webster
Deerfield	North Brookfield	Wendell
Dighton	Northbridge	West Bridgewater
Dudley	Norton	West Brookfield
Dunstable	Oxford	Westminster
East Brookfield	Pelham	Weymouth
Fitchburg	Pepperell	Winchendon
Gardner	Randolph	Worcester
Groton	Raynham	Wrentham

2011 Potential Touch-up Municipalities		
Abington	Holbrook	Richmond
Andover	Hopedale	Rowley
Attleboro	Lancaster	Salem
Auburn	Lawrence	Seekonk
Avon	Leicester	Sheffield
Belchertown	Lenox	Somerset
Bellingham	Leominster	Southborough
Beverly	Lowell	Southbridge
Boxford	Lynn	Sterling
Bridgewater	Mansfield	Stoughton
Brimfield	Marlborough	Sturbridge
Brockton	Medway	Suttton
Brookfield	Mendon	Swampscott
Charlton	Methuen	Swansea
Cheshire	Middleton	Tewksbury
Clinton	Milford	Topsfield
Danvers	Millbury	Uxbridge
Dighton	Monson	Ware
Easton	North Andover	Warren
Fall River	North Attleborough	West Boylston
Franklin	North Reading	West Bridgewater
Gardner	Norton	West Brookfield
Georgetown	Oxford	West Stockbridge
Great Barrington	Palmer	Whitman
Groveland	Peabody	Worcester
Haverhill	Plainville	Wrentham

APPENDIX 5

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

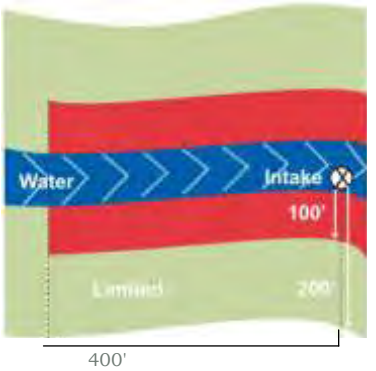
Required by 333 CMR 11.00 and/or approved Vegetation Management Program and Yearly Operational Plan.

<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

No Restrictions

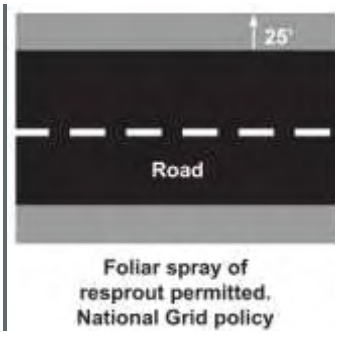
Sensitive areas readily identifiable in the field: *continued*

- 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 6

LIST OF DESIRABLE SPECIES AND UNDESIRABLE TARGET SPECIES

EXHIBIT A:

Undesirable 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.

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 Minimum Clearance Distance, or local conditions do not warrant removal. Any plant on the right-of-way that invades the Minimum Clearance Distance 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:

Wood 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 Minimum Clearance Distance.

Species	**Code**
American Barberry	BAR
Chokeberry	
Black Chokeberry	BCB
Red Chokeberry	RCB
Blueberry	
Low	BLU
Highbush	HBL
Button Bush	BTN
Dewberry	DEW
Dogwood	DOG
Red Osier	“
Stiff (similar to Red Osier)	“
Grey	“
Silky	“
Roundleaf	“
Elderberry	ELD
Hazelnut	HAZ
American Hazelnut	“
Beaked Hazelnut	“
Honeysuckle	HON
Huckleberry	HUC
Juniper	GRJ
Dwarf	“
Ground/Trailing	“
Mountain Holly	MOH
Mountain Laurel	MOL
New Jersey Tea	NJT
Northern Prickly Ash	NPA
Shrub Oak	SOK
Privet	PRI
Gooseberry	RIB
Rose	
Domestic	DOR
Multiflora	MUR

EXHIBIT C: (cont.)

Wood Shrubs (cont.)

Species	**Code**
Rubus	RUB
Blackberry	"
Raspberry	"
Silverberry	
American	SIL
Sumac	SUM
Smooth	"
Winged	"
Common Spicebush	SPB
Spirea	SPI
Sweetfern	"
Steeple Bush	"
Sweetfern	SWF
Viburnum	VIB
Arrowwood	ARR
Highbush Cranberry	HCR
Mapleleaf	MVB
Nannyberry	NAN
Northern Wild Raisin	RAI
Hobblebush	HOB
Winterberry Holly	WIN
American Yew	AMY

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.

APPENDIX 7

HERBICIDE LABELS

Specimen Label

Dow AgroSciences

Accord® Concentrate

Herbicide

For control of annual and perennial weeds and woody plants in forests, non-crop sites, and in and around aquatic sites; also for use in wildlife habitat areas, 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(s):

glyphosate[1] N-(phosphonomethyl)glycine, isopropylamine salt	53.8%
Other Ingredients	46.2%
Total Ingredients	100.0%

[1] Contains 5.4 pounds per gallon glyphosate, isopropylamine salt (4 pounds per gallon glyphosate acid).

EPA Reg. No. 62719-324

Keep Out of Reach of Children

CAUTION PRECAUCION

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

Precautionary Statements

Hazards to Humans and Domestic Animals

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 (Personal Protective Equipment). 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.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Terms and Conditions of Use, Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies elsewhere on this label. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

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. See individual container label for repackaging limitations.

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 Reuse: 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 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 larger than 5 gallons:
Container Reuse: 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.

Nonrefillable containers larger than 5 gallons:
Container Reuse: 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.

General Information
(How this product works)

This product is a water-soluble liquid, which mixes readily with water and nonionic surfactant to be applied as a foliar spray for the control or destruction of many herbaceous and woody plants. This product is intended for control of annual and perennial weeds and woody plants in forests, pine straw plantations, non-crop sites such as utility rights-of-way, and in and around aquatic sites; also for use in wildlife habitat areas, for perennial grass release, and grass growth suppression and grazed areas on these sites.

The active ingredient in this product moves through the plant from the point of foliage contact to and into the root system. Visible effects on most annual weeds occur within 2 to 4 days, 7 days or more on most perennial weeds, and 30 days or more on most woody plants. Extremely cool or cloudy weather following treatment may slow the activity of this product and delay visual effects of control. Visible effects include gradual wilting and yellowing of the plant which advances to complete browning of above-ground growth and deterioration of underground plant parts.

Unless otherwise directed on this label, delay application until vegetation has emerged and reached the stages described for control of such vegetation under the "Weeds Controlled" section of this label.

Unemerged plants arising from unattached underground rhizomes or root stocks of perennials or brush will not be affected by the spray and will continue to grow. For this reason best control of most perennial weeds or brush is obtained when treatment is made at late growth stages approaching maturity.

Always use the higher rate of this product and surfactant within the recommended range when vegetation is heavy or dense, when treating dense multi-canopied sites or woody vegetation or difficult-to-control herbaceous or woody plants.

Do not treat weeds, brush or trees under poor growing conditions such as drought stress, disease or insect damage, as reduced control may result. Reduced control of target vegetation may also occur if foliage is heavily covered with dust at the time of treatment.

Reduced control may result when applications are made to woody plants or weeds following site disturbance or plant top growth removal from grazing, mowing, logging or mechanical brush control. For best results, delay treatment of such areas until resprouting and foliar growth has restored the target vegetation to the recommended stage of growth for optimum herbicide exposure and control.

Rainfall or irrigation occurring within 6 hours after application may reduce effectiveness. Heavy rainfall or irrigation within 2 hours after application may wash the product off the foliage and a repeat treatment may be required.

This product does not provide residual weed control. For subsequent residual weed control, follow a label-approved herbicide program. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used.

Note: The maximum rates stated throughout this product's labeling apply to this product combined with the use of all other herbicides containing glyphosate or sulfosate as the active ingredient, whether applied as mixtures or separately. Calculate the application rates and ensure that the total use of this and other glyphosate or sulfosate containing products does not exceed the maximum use rates.

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, such as 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 of greater than 4.5 but not to exceed 7.5 quarts per acre, no more than 15 percent of the available grazing area may be treated.
  - ▶ For application rates that do not exceed 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.

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. When not in use, keep container closed to prevent spills and contamination.

Buyer and all users are responsible for all loss or damage in connection with the use or handling of mixtures of this product or other materials that are not expressly recommended in this label. Mixing this product with herbicides or other materials not recommended in this label may result in reduced performance.

ATTENTION: Avoid drift. Extreme care must be used 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 plant or crop injury occurring from the use of this product is greatest when winds are gusty or in excess of 5 miles per hour or when other conditions, including lesser wind velocities, will allow spray drift to occur. 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.**

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.

1. The distance of the outer most 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 should be observed.

The applicator should be familiar with and take into account the information covered in the following **Aerial Drift Reduction Advisory Information**:

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 drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversion section of this label).

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-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 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 backwards, parallel to the airstream will produce larger droplets than other orientations. Significant deflection from the 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 larger droplets than other nozzle types.

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-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 2-10 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 drift.

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

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

Mixing And Application Instructions

Apply these spray solutions in properly maintained and calibrated equipment capable of delivering desired volumes. Hand-gun applications should be properly directed to avoid spraying desirable plants. Note: reduced results may occur if water containing soil is used, such as water from ponds and unlined ditches.

Mixing

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 water while adding the required amount of this product (see "Directions for Use" and "Weeds Controlled" sections of this label).
2. Near the end of the filling process, add the required surfactant and mix well. Remove hose from tank immediately after filling to avoid siphoning back into the water source.

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.

During mixing and application, foaming of the spray solution may occur. To prevent or minimize foam, avoid the use of mechanical agitators, place the filling hose below the surface of the spray solution (only during filling), terminate by-pass and return lines at the bottom of the tank, and, if needed, use an approved anti-foam or defoaming agent.

Keep by-pass line on or near bottom of tank to minimize foaming. Screen size in nozzle or line strainers should be no finer than 50 mesh. Carefully select correct nozzle to avoid spraying a fine mist. For best results with conventional ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

IMPORTANT: When using this product, unless otherwise specified, mix with a surfactant such as a non-ionic 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).
Always read and follow the manufacturer's surfactant label recommendations for best results.

Colorants or marking dyes approved for use with herbicides may be added to spray mixtures of 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 label recommendations.

Clean sprayer and parts immediately after using this product by thoroughly flushing with water and dispose of rinsate according to labeled use or disposal instructions.

Carefully observe all cautionary statements and other information appearing in the surfactant label.

Application Equipment And Techniques

ATTENTION: AVOID DRIFT. EXTREME CARE MUST BE EXERCISED 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 crops, plants, or other areas on which the treatment was not intended. The likelihood of plant or crop injury occurring from the use of this product is greatest when winds are gusty or in excess of 5 miles per hour or when other conditions, including lesser wind velocities, will allow spray drift to occur. 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 a manner not consistent with this label may result in injury to persons, animals, or crops, or other unintended consequences. When not in use, keep container closed to prevent spills and contamination.

Aerial Equipment

See the supplemental label for use of this product by air in California.

For control of weed or brush species listed in this label using aerial application equipment: For aerial broadcast application, unless otherwise specified, apply the rates of this product and surfactant recommended for broadcast application in a spray volume of 3 to 20 gallons of water per acre. See the "Weeds Controlled" section of this label for labeled annual and herbaceous weeds and woody plants and broadcast rate recommendations. Aerial applications of this product may only be made as specifically recommended in this label. For aerial application of this product in California, refer to Federal supplemental label for this product entitled "For Aerial Application in California Only". In California, aerial application may be made in aquatic sites and noncrop areas, including aquatic sites present in noncrop areas that are part of the intended treatment.

Forestry and Utility Rights-of-Way Sites: It is recommended that this product be applied by helicopter only in forestry sites and utility rights-of-way. Apply the rate of this product and surfactant recommended for broadcast sprays in a spray volume of 5 to 30 gallons per acre.

In California, aerial application may be made only in non-residential, forestry sites or chaparral areas.

AVOID DRIFT. Do not apply during inversion conditions, when winds are gusty or under any other condition which will allow 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.

Coarse sprays are less likely to drift; therefore, do not use nozzles or nozzle configurations which dispense spray as fine spray droplets. Do not angle nozzles forward into the airstream and do not increase spray volume by increasing nozzle pressure.

Drift control additives may be used. When a drift control additive is used, read and carefully observe the cautionary statements and all other information appearing in the additive label. The use of a drift control agent for conifer and herbaceous release applications may result in conifer injury and is not recommended.

Ensure uniform application. To avoid streaked, uneven or overlapped application, use appropriate marking devices.

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 are most susceptible.** The maintenance of an organic coating (paint) which meets aerospace specification MIL-C-38413 may prevent corrosion.

Ground Broadcast Equipment

For control of weed or brush species listed in this label using conventional boom equipment: For ground broadcast application, unless otherwise specified, apply the rates of this product and surfactant recommended for broadcast application in a spray volume of 3 to 30 gallons of water per acre. See the "Weeds Controlled" section of this label for labeled annual and herbaceous weeds and woody plants and broadcast rate recommendations. As density of vegetation increases, spray volume should be increased within the recommended range to ensure complete coverage. Carefully select correct nozzle to avoid spraying a fine mist. For best results with ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

Forestry and Utility Rights-of-Way Sites: This product is recommended for broadcast applications using suitable ground equipment in forestry sites, utility sites, and utility rights-of way. Apply the recommended rates of this product and surfactant in a spray volume of 10 to 60 gallons per acre. Check for even distribution of spray droplets.

Hand-Held and High-Volume Equipment
(Use Coarse Sprays Only)

For control of weeds listed in this label using knapsack sprayers or high-volume spraying equipment utilizing handguns or other suitable nozzle arrangements:

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 in this label.

Applications should be made on a spray-to-wet basis. Spray coverage should be uniform and complete. 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 zig-zag 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. Small, open-branched trees need only be treated from one side. If the foliage is thick or there are multiple root sprouts, applications must be made from several sides to ensure adequate spray coverage.

Prepare the desired volume of spray solution by mixing the amount of this product in water, shown in the following table:

Spray Solution

Desired Volume	Amount of this product							
	3/4%	1%	1 1/4%	1 1/2%	2%	5%	8%	10%
1 gal	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	12 3/4 fl oz
25 gal	1 1/2 pt	1 qt	1 1/4 qt	1 1/2 qt	2 qt	5 qt	2 gal	2.5 gal
100 gal	3 qt	1 gal	1 1/4 gal	1 1/2 gal	2 gal	5 gal	8 gal	10 gal

2 tablespoons = 1 fluid ounce

For use in knapsack sprayers, it is suggested that the recommended amount of this product be mixed with water in a larger container. Fill the knapsack sprayer with the mixed solution and add the correct amount of surfactant.

Selective Equipment

This product may be applied through shielded sprayers or wiper application equipment. This equipment may be used to selectively control undesirable vegetation without harming desirable vegetation.

Shielded sprayers direct the herbicide solution onto weeds while shielding desirable vegetation from the spray solution. Any recommended rate or tank mixture of this product may be used employing this equipment.

Wiper applicators physically wipe product directly onto undesirable vegetation. Care should be taken to avoid wiping desirable vegetation. Use a 33 to 100 percent solution of this product, diluted in water for wiper applications. Use a 33 percent solution for wick or gravity feed systems. Higher concentrations may be used in pressurized systems that are capable of handling thicker solutions. Addition of a nonionic surfactant at a rate of 10 percent by volume of total herbicide solution is recommended.

Weeds Controlled

Annual Weeds

Apply to actively growing annual grasses and broadleaf weeds.

Allow at least 3 days after application before disturbing treated vegetation. After this period the weeds may be mowed, tilled or burned. See "Directions for Use," "General Information" and "Mixing and Application Instructions" for labeled uses and specific application instructions.

Broadcast Application Rates: For weeds less than 6 inches tall, use 1 1/2 pints of this product per acre plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient. If weeds are greater than 6 inches tall, use 2½ pints of this product per acre plus a non-ionic surfactant containing 80% or greater active ingredient..

Hand-Held, High-Volume Application Rates: Use a 3/4 percent solution of this product in water plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient. Apply to foliage of vegetation to be controlled.

When applied as directed, this product plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient will control the following annual weeds:

Common Name	Scientific Name
Balsamapple [1]	*Momordica charantia*
Barley	*Hordeum vulgare*
Barnyardgrass	*Echinochloa crus-galli*
Bassia, fivehook	*Bassia hyssopifolia*
Bluegrass, annual	*Poa annua*
Bluegrass, bulbous	*Poa bulbosa*
Brome	*Bromus spp.*
Buttercup	*Ranunculus spp.*
Cheat	*Bromus secalinus*
Chickweed, mouseear	*Cerastium vulgatum*
Cocklebur	*Xanthium strumarium*
Corn, volunteer	*Zea mays*
Crabgrass	*Digitaria spp.*
Dwarfdandelion	*Krigia cespitosa*
Falseflax, smallseed	*Camelina microcarpa*
Fiddleneck	*Amsinckia spp.*
Flaxleaf fleabane	*Conyza bonariensis*
Fleabane	*Erigeron spp.*
Foxtail	*Setaria spp.*
Foxtail, Carolina	*Alopecurus carolinianus*
Groundsel, common	*Senecio vulgaris*
Horseweed/Marestail	*Conyza canadensis*
Kochia	*Kochia scoparia*
Lambsquarters, common	*Chenopodium album*
Lettuce, prickly	*Lactuca serriola*
Morningglory	*Ipomoea spp.*
Mustard, blue	*Chorispora tenella*
Mustard, tansy	*Descurainia pinnata*
Mustard, tumble	*Sisymbrium altissimum*
Mustard, wild	*Sinapis arvensis*
Oats, wild	*Avena fatua*
Panicum	*Panicum spp.*
Pennycress, field	*Thlaspi arvense*
Pigweed, redroot	*Amaranthus retroflexus*
Pigweed, smooth	*Amaranthus hybridus*
Ragweed, common	*Ambrosia artemisiifolia*
Ragweed, giant	*Ambrosia trifida*
Rocket, London	*Sisymbrium irio*
Rye	*Secale cereale*
Ryegrass, Italian [11]	*Lolium multiflorum*
Sandbur, field	*Cenchrus spp.*
Shattercane	*Sorghum bicolor*
Shepherd's-purse	*Capsella bursa-pastoris*
Signalgrass, broadleaf	*Brachiaria platyphylla*
Smartweed, Pennsylvania	*Polygonum pensylvanicum*
Sowthistle, annual	*Sonchus oleraceus*
Spanishneedles [11]	*Bidens bipinnata*
Stinkgrass	*Eragrostis cilianensis*
Sunflower	*Helianthus annuus*
Thistle, Russian	*Salsola kali*
Spurry, umbrella	*Holosteum umbellatum*
Velvetleaf	*Abutilon theophrasti*
Wheat	*Triticum aestivum*
Witchgrass	*Panicum capillare*

[1] Apply with hand-held equipment only.
[11] Apply 3 pints of this product per acre.

Annual weeds will generally continue to germinate from seed throughout the growing season. Repeat treatments will be necessary to control later germinating weeds.

Perennial Weeds

Apply this product to control most vigorously growing perennial weeds. Unless otherwise directed, apply when target plants are actively growing and most have reached early head or early bud stage of growth. Unless otherwise directed, allow at least 7 days after application before disturbing vegetation.

NOTE: If weeds have been mowed or tilled, do not treat until regrowth has reached the recommended stages. Fall treatments must be applied before a killing frost.

Repeat treatments may be necessary to control weeds regenerating from underground parts or seed.

Specific Weed Control Recommendations: For perennial weeds, apply the recommended rate plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. .
When applied as directed, this product plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient will control the following perennial weeds: (Numbers in parentheses "(-)" following common name of a listed weed species refer to "Specific Perennial Weed Control Recommendations" for that weed which follow the species listing.)

Common Name	Scientific Name
Alfalfa (31)	*Medicago sativa*
Alligatorweed [1] (1)	*Alternanthera philoxeroides*
Anise/Fennel (31)	*Foeniculum vulgare*
Artichoke, Jerusalem (31)	*Helianthus tuberosus*
Bahiagrass (31)	*Paspalum notatum*
Bermudagrass (2)	*Cynodon dactylon*
Bindweed, field (3)	*Convolvulus arvensis*
Bluegrass, Kentucky (12)	*Poa pratensis*
Blueweed, Texas (3)	*Helianthus ciliaris*
Brackenfern (4)	*Pteridium spp.*
Bromegrass, smooth (12)	*Bromus inermis*
Canarygrass, reed (12)	*Phalaris arundinacea*
Cattail (5)	*Typha spp.*
Clover, red (31)	*Trifolium pratense*
Clover, white (31)	*Trifolium repens*
Cogongrass (6)	*Imperata clylindrica*
Cordgrass (7)	*Spartina spp.*
Cutgrass, giant [1] (8)	*Zizaniopsis miliacea*
Dallisgrass (31)	*Paspalum dilatatum*
Dandelion (31)	*Taraxacum officinale*
Dock, curly (31)	*Rumex crispus*
Dogbane, hemp (9)	*Apocynum cannabinum*
Fescue (31)	*Festuca spp.*
Fescue, tall (10)	*Festuca arundinacea*
Guineagrass (11)	*Panicum maximum*
Hemlock, poison (31)	*Conium maculatum*

Common Name	Scientific Name
Horsenettle (31)	*Solanum carolinense*
Horseradish (9)	*Armoracia rusticana*
Ice Plant (22)	*Mesembryanthemum crystallinum*
Johnsongrass (12)	*Sorghum halepense*
Kikuyugrass (21)	*Pennisetum clandestinum*
Knapweed (9)	*Centaurea repens*
Lantana (13)	*Lantana camara*
Lespedeza, common (31)	*Lespedeza striata*
Lespedeza, sericea (31)	*Lespedeza cuneata*
Loosestrife, purple (14)	*Lythrum salicaria*
Lotus, American (15)	*Nelumbo lutea*
Maidencane (16)	*Panicum hematomon*
Milkweed (17)	*Asclepias spp.*
Muhly, wirestem (21)	*Muhlenbergia frondosa*
Mullein, common (31)	*Verbascum thapsus*
Napiergrass (31)	*Pennisetum purpureum*
Nightshade, silverleaf (3)	*Solanum elaeagnifolium*
Nutsedge, purple (18)	*Cyperus rotundus*
Nutsedge, yellow (18)	*Cyperus esculentus*
Orchardgrass (12)	*Dactylis glomerata*
Pampasgrass (19)	*Cortaderia jubata*
Paragrass (16)	*Brachiaria mutica*
Phragmites[''] (20)	*Phragmites spp.*
Quackgrass (21)	*Agropyron repens*
Reed, giant (22)	*Arundo donax*
Ryegrass, perennial (12)	*Lolium perenne*
Smartweed, swamp (31)	*Polygonum coccineum*
Spatterdock (23)	*Nuphar luteum*
Starthistle, yellow (31)	*Centaurea solstitialis*
Sweet potato, wild [1] (24)	*Ipomoea pandurata*
Thistle, artichoke (25)	*Cynara cardunculus*
Thistle, Canada (25)	*Cirsium arvense*
Timothy (12)	*Phleum pratense*
Torpedograss [1] (26)	*Panicum repens*
Tules, common (27)	*Scirpus acutus*
Vaseygrass (31)	*Paspalum urvillei*
Velvetgrass (31)	*Holcus spp.*
Waterhyacinth (28)	*Eichornia crassipes*
Waterlettuce (29)	*Pistia stratiotes*
Waterprimrose (30)	*Ludwigia spp.*
Wheatgrass, western (12)	*Agropyron smithii*

[1] Partial control.

[''] Partial control in southeastern states. See "Specific Weed Control Recommendations" below.

Specific Perennial Weed Control Recommendations:

1. **Alligatorweed:** Apply 6 pints of this product per acre as a broadcast spray or as a 1 1/4 percent solution with hand-held equipment to provide partial control of alligatorweed. Apply when most of the target plants are in bloom. Repeat applications will be required to maintain such control.
2. **Bermudagrass:** Apply 7 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Apply when target plants are actively growing and when seedheads appear.
3. **Bindweed, field / Silverleaf Nightshade / Texas Blueweed:** Apply 6 to 7 1/2 pints of this product per acre as a broadcast spray west of the Mississippi River and 4 1/2 to 6 pints of this product per acre east of the Mississippi River. With hand-held equipment, use a 1 1/2 percent solution. Apply when target plants are actively growing and are at or beyond full bloom. For silverleaf nightshade, best results can be obtained when application is made after berries are formed. Do not treat when weeds are under drought stress. New leaf development indicates active growth. For best results apply in late summer or fall.
4. **Brackenfern:** Apply 4 1/2 to 6 pints of this product per acre as a broadcast spray or as a 3/4 to 1 percent solution with hand-held equipment. Apply to fully expanded fronds which are at least 18 inches long.
5. **Cattail:** Apply 4 1/2 to 6 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when target plants are actively growing and are at or beyond the early-to-full bloom stage of growth. Best results are achieved when application is made during the summer or fall months.
6. **Cogongrass:** Apply 4 1/2 to 7 1/2 pints of this product per acre as a broadcast spray. Apply when cogongrass is at least 18 inches tall and actively growing in late summer or fall. Allow 7 or more days after application before tillage or mowing. Due to uneven stages of growth and the dense nature of vegetation preventing good spray coverage, repeat treatments may be necessary to maintain control.
7. **Cordgrass:** Apply 4 1/2 to 7 1/2 pints of this product per acre as a broadcast spray or as a 1 to 2 percent solution with hand-held equipment. Schedule applications in order to allow 6 hours before treated plants are covered by tidewater. The presence of debris and silt on the cordgrass plants will reduce performance. It may be necessary to wash targeted plants prior to application to improve uptake of this product into the plant.
8. **Cutgrass, giant:** Apply 6 pints of this product per acre as a broadcast spray or as a 1 percent solution with hand-held equipment to provide partial control of giant cutgrass. Repeat applications will be required to maintain such control, especially where vegetation is partially submerged in water. Allow for substantial regrowth to the 7 to 10-leaf stage prior to retreatment.
9. **Dogbane, hemp / Knapweed / Horseradish:** Apply 6 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the late bud-to-flower stage of growth. For best results, apply in late summer or fall.
10. **Fescue, tall:** Apply 4 1/2 pints of this product per acre as a broadcast spray or as a 1 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the boot-to-head stage of growth. When applied prior to the boot stage, less desirable control may be obtained.
11. **Guineagrass:** Apply 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when target plants are actively growing and when most have reached at least the 7-leaf stage of growth.
12. **Johnsongrass / Bluegrass, Kentucky / Bromegrass, smooth / Canarygrass, reed / Orchardgrass / Ryegrass, perennial / Timothy / Wheatgrass, western:** Apply 3 to 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the boot-to-head stage of growth. When applied prior to the boot stage, less desirable control may be obtained. In the fall, apply before plants have turned brown.

13. **Lantana**: Apply this product as a 3/4 to 1 percent solution with hand-held equipment. Apply to actively growing lantana at or beyond the bloom stage of growth. Use the higher application rate for plants that have reached the woody stage of growth.
14. **Loosestrife, purple:** Apply 4 pints of this product per acre as a broadcast spray or as a 1 to 1 1/2 percent solution using hand-held equipment. Treat when plants are actively growing at or beyond the bloom stage of growth. Best results are achieved when application is made during summer or fall months. Fall treatments must be applied before a killing frost.
15. **Lotus, American**: Apply 4 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Treat when plants are actively growing at or beyond the bloom stage of growth. Best results are achieved when application is made during summer or fall months. Fall treatments must be applied before a killing frost. Repeat treatment may be necessary to control regrowth from underground parts and seeds.
16. **Maidencane / Paragrass:** Apply 6 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Repeat treatments will be required, especially to vegetation partially submerged in water. Under these conditions, allow for regrowth to the 7 to 10-leaf stage prior to retreatment.
17. **Milkweed, common**: Apply 4 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the late bud-to-flower stage of growth.
18. **Nutsedge: purple, yellow:** Apply 4 1/2 pints of this product per acre as a broadcast spray, or as a 3/4 percent solution with hand-held equipment to control existing nutsedge plants and immature nutlets attached to treated plants. Apply when target plants are in flower or when new nutlets can be found at rhizome tips. Nutlets which have not germinated will not be controlled and may germinate following treatment. Repeat treatments will be required for long-term control.
19. **Pampasgrass**: Apply a 1 1/2 percent solution of this product with hand-held equipment when plants are actively growing.
20. **Phragmites:** For partial control of phragmites in Florida and the counties of other states bordering the Gulf of Mexico, apply 7 1/2 pints per acre as a broadcast spray or apply a 1 1/2 percent solution with hand-held equipment. In other areas of the U.S., apply 4 to 6 pints per acre as a broadcast spray or apply a 3/4 percent solution with hand-held equipment for partial control. For best results, treat during late summer or fall months when plants are actively growing and in full bloom. Due to the dense nature of the vegetation, which may prevent good spray coverage and uneven stages of growth, repeat treatments may be necessary to maintain control. Visual control symptoms will be slow to develop.
21. **Quackgrass / Kikuyugrass / Muhly, wirestem**: Apply 3 to 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment when most quackgrass or wirestem muhly is at least 8 inches in height (3 to 4-leaf stage of growth) and actively growing. Allow 3 or more days after application before tillage.
22. **Reed, giant / ice plant:** For control of giant reed and ice plant, apply a 1 1/2 percent solution of this product with hand-held equipment when plants are actively growing. For giant reed, best results are obtained when applications are made in late summer to fall.
23. **Spatterdock:** Apply 6 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when most plants are in full bloom. For best results, apply during the summer or fall months.
24. **Sweet potato, wild:** Apply this product as a 1 1/2 percent solution using hand-held equipment. Apply to actively growing weeds that are at or beyond the bloom stage of growth. Repeat applications will be required. Allow the plant to reach the recommended stage of growth before retreatment.
25. **Thistle, Canada / artichoke:** Apply 3 to 4 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment for Canada thistle. To control artichoke thistle, apply a 2 percent solution as a spray-to-wet application. Apply when target plants are actively growing and are at or beyond the bud stage of growth.
26. **Torpedograss:** Apply 6 to 7 1/2 pints of this product per acre as a broadcast spray or as a 3/4 to 1 1/2 percent solution with hand-held equipment to provide partial control of torpedograss. Use the lower rates under terrestrial conditions, and the higher rates under partially submerged or a floating mat condition. Repeat treatments will be required to maintain such control.
27. **Tules, common**: Apply this product as a 1 1/2 percent solution with hand-held equipment. Apply to actively growing plants at or beyond the seedhead stage of growth. After application, visual symptoms will be slow to appear and may not occur for 3 or more weeks.
28. **Waterhyacinth:** Apply 5 to 6 pints of this product per acre as a broadcast spray or apply a 3/4 to 1 percent solution with hand-held equipment. Apply when target plants are actively growing and at or beyond the early bloom stage of growth. After application, visual symptoms may require 3 or more weeks to appear with complete necrosis and decomposition usually occurring within 60 to 90 days. Use the higher rates when more rapid visual effects are desired.
29. **Waterlettuce**: For control, apply a 3/4 to 1 percent solution of this product with hand-held equipment to actively growing plants. Use higher rates where infestations are heavy. Best results are obtained from mid-summer through winter applications. Spring applications may require retreatment.
30. **Waterprimrose:** Apply this product as a 3/4 percent solution using hand-held equipment. Apply to plants that are actively growing at or beyond the bloom stage of growth, but before fall color changes occur. Thorough coverage is necessary for best control.
31. **Other perennial weeds listed above**: Apply 4 1/2 to 7 1/2 pints of this product per acre as a broadcast spray or apply as a 3/4 to 1 1/2 percent solution with hand-held equipment.

Woody Brush and Trees

NOTE: If brush has been mowed or tilled or trees have been cut, do not treat until regrowth has reached the recommended stage of growth.

Application Rates and Timing
When applied as a 5 to 8 percent solution as a directed application as described in the "Hand-Held and High-Volume Equipment" section, this product will control or partially control all wood brush and tree species listed in this section of this label. Use the higher rate of application for dense stands and larger woody brush and trees.

Specific Brush or Tree Control Recommendations: Numbers in parentheses "(-)" following the common name of a listed brush or tree species refer to "Specific Brush or Tree Control Recommendations" which follow the species listing. See this section for specific application rates and timing for listed species.

For woody brush and trees, apply the recommended rate plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. Make applications when plants are actively growing and, unless otherwise directed, after full-leaf expansion. Use the higher rate for larger plants and/or dense areas of growth. On vines, use the higher 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 application is 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. Symptoms may not appear prior to frost or senescence with fall treatments.

Allow 7 or more days after application before tillage, mowing or removal. Repeat treatments 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.

See the "Directions for Use" and "Mixing and Application Instructions" sections in this label for labeled use and specific application instructions. **When applied as directed, this product plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient will control the following woody brush plants and trees:** (Numbers in parentheses "(-)" following common name of a listed brush or tree species refer to "Specific Brush or Tree Control Recommendations" for that species which follow the species listing.)

Common Name	Scientific Name
Alder (1)	*Alnus spp.*
Ash [1] (20)	*Fraxinus spp.*
Aspen, quaking (2)	*Populus tremuloides*
Bearclover, Bearmat (20)	*Chamaebatia foliolosa*
Birch (3)	*Betula spp.*
Blackberry (1)	*Rubus spp.*
Broom, French (4)	*Cytisus monspessulanus*
Broom, Scotch (4)	*Cytisus scoparius*
Buckwheat, California [1] (5)	*Eriogonum fasciculatum*
Cascara [1] (20)	*Rhamnus purshiana*
Catsclaw [1] (6)	*Acacia greggi*
Ceanothus (20)	*Ceanothus spp.*
Chamise (17)	*Adenostoma fasciculatum*
Cherry, bitter (7)	*Prunus emarginata*
Cherry, black (7)	*Prunus serotina*
Cherry, pin (7)	*Prunus pensylvanica*
Coyote brush (8)	*Baccharis consanguinea*
Creeper, Virginia [1] (20)	*Parthenocissus quinquefolia*
Dewberry (1)	*Rubus trivialis*
Dogwood (9)	*Cornus spp.*
Elderberry (3)	*Sambucus spp.*
Elm [1] (20)	*Ulmus spp.*
Eucalyptus, bluegum (10)	*Eucalyptus globulus*
Hasardia [1] (5)	*Haplopappus squamosus*
Hawthorn (2)	*Crataegus spp.*
Hazel (3)	*Corylus spp.*
Hickory (9)	*Carya spp.*
Holly, Florida (11) (Brazilian peppertree)	*Schinus terebinthifolius*
Honeysuckle (1)	*Lonicera spp.*
Hornbeam, American (20)	*Carpinus caroliniana*
Kudzu (12)	*Pueraria lobata*
Locust, black [1] (20)	*Robinia pseudoacacia*
Manzanita (20)	*Arctostaphylos spp.*
Maple, red [1] (13)	*Acer rubrum*
Maple, sugar (14)	*Acer saccharum*
Maple, vine [1] (20)	*Acer circinatum*
Monkey flower [1] (5)	*Mimulus guttatus*
Oak, black [1] (20)	*Quercus velutina*
Oak, northern pin (14)	*Quercus palustris*
Oak, post (1)	*Quercus stellata*
Oak, red (14)	*Quercus rubra*
Oak, southern red (7)	*Quercus falcata*
Oak, white [1] (20)	*Quercus alba*
Persimmon [1] (20)	*Diospyros spp.*
Poison-ivy (15)	*Rhus radicans*
Poison-oak (15)	*Rhus toxicodendron*
Poplar, yellow [1] (20)	*Liriodendron tulipifera*
Prunus (7)	*Prunus spp.*
Raspberry (1)	*Rubus spp.*
Redbud, eastern (20)	*Cercis canadensis*
Rose, multiflora (16)	*Rosa multiflora*
Russian-olive (20)	*Elaeagnus angustifolia*
Sage: black (17), white	*Salvia spp.*
Sagebrush, California (17)	*Artemisia californica*
Salmonberry (3)	*Rubus spectabilis*
Salt cedar [1] (9)	*Tamarix spp.*
Saltbush, sea myrtle (18)	*Baccharis halimifolia*
Sassafras (20)	*Sassafras albidum*
Sourwood [1] (20)	*Oxydendrum arboreum*
Sumac, poison [1] (20)	*Rhus vernix*
Sumac, smooth [1] (20)	*Rhus glabra*
Sumac, winged [1] (20)	*Rhus copallina*
Sweetgum (7)	*Liquidambar styraciflua*
Swordfern [1] (20)	*Polystichum munitum*
Tallowtree, Chinese (17)	*Sapium sebiferum*
Thimbleberry (3)	*Rubus parviflorus*
Tobacco, tree [1] (5)	*Nicotiana glauca*
Trumpetcreeper (2)	*Campsis radicans*
Waxmyrtle, southern [1] (11)	*Myrica cerifera*
Willow (19)	*Salix spp.*

[1] Partial control (See below for control or partial control instructions.)

Specific Brush or Tree Control Recommendations:

1. **Alder / Blackberry / Dewberry / Honeysuckle / Oak, Post / Raspberry:** For control, apply 4 1/2 to 6 pints per acre as a broadcast spray or as a 3/4 to 1 1/4 percent solution with hand-held equipment.
2. **Aspen, Quaking / Hawthorn / Trumpetcreeper:** For control, apply 3 to 4 1/4 pints of this product per acre as a broadcast spray or as a 3/4 to 1 1/4 percent solution with hand-held equipment.
3. **Birch / Elderberry / Hazel / Salmonberry / Thimbleberry:** For control, apply 3 pints per acre of this product as a broadcast spray or as a 3/4 percent solution with hand-held equipment.
4. **Broom, French / Broom, Scotch:** For control, apply a 1 1/4 to 1 1/2 percent solution with hand-held equipment.
5. **Buckwheat, California / Hasardia / Monkey flower / Tobacco, tree:** For partial control of these species, apply a 3/4 to 1 1/2 percent solution of this product as a foliar spray with hand-held equipment. Thorough coverage of foliage is necessary for best results.

6. **Catsclaw:** For partial control, apply a 1 1/4 to 1 1/2 percent solution with hand-held equipment when at least 50 percent of the new leaves are fully developed.
7. **Cherry, bitter / Cherry, black / Cherry, pin / Oak, southern red / Sweetgum / Prunus:** For control, apply 3 to 7 1/2 pints of this product per acre as a broadcast spray or as a 1 to 1 1/2 percent solution with hand-held equipment.
8. **Coyote brush:** For control, apply a 1 1/4 to 1 1/2 percent solution with hand-held equipment when at least 50 percent of the new leaves are fully developed.
9. **Dogwood / Hickory / Salt cedar:** For partial control, apply a 1 to 2 percent solution of this product with hand-held equipment or 6 to 7 1/2 pints per acre as a broadcast spray.
10. **Eucalyptus, bluegum:** For control of eucalyptus resprouts, apply a 1 1/2 percent solution of this product with hand-held equipment when resprouts are 6 to 12-feet tall. Ensure complete coverage. Apply when plants are actively growing. Avoid application to drought-stressed plants.
11. **Holly, Florida / Waxmyrtle, southern:** For partial control, apply this product as a 1 1/2 percent solution with hand-held equipment.
12. **Kudzu:** For control, apply 6 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Repeat applications will be required to maintain control.
13. **Maple, red:** For control, apply as a 3/4 to 1 1/4 percent solution with hand-held equipment when leaves are fully developed. For partial control, apply 2 to 7 1/2 pints of this product per acre as a broadcast spray.
14. **Maple, sugar / Oak: northern pin / Oak, red:** For control, apply as a 3/4 to 1 1/4 percent solution with hand-held equipment when at least 50 percent of the new leaves are fully developed.
15. **Poison-ivy / Poison-oak:** For control, apply 6 to 7 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Repeat applications may be required to maintain control. Fall treatments must be applied before leaves lose green color.
16. **Rose, multiflora:** For control, apply 3 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Treatments should be made prior to leaf deterioration by leaf-feeding insects.
17. **Sage, black / Sagebrush, California / Chamise / Tallowtree, Chinese:** For control of these species, apply a 3/4 percent solution of this product as a foliar spray with hand-held equipment. Thorough coverage of foliage is necessary for best results.
18. **Saltbush, sea myrtle:** For control, apply this product as a 1 percent solution with hand-held equipment.
19. **Willow:** For control, apply 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment.
20. **Other woody brush and trees listed above:** For partial control, apply 3 to 7 1/2 pints of this product per acre as a broadcast spray or as a 3/4 to 1 1/2 percent solution with hand-held equipment.

Aquatic and other Noncrop Sites

Apply this product as directed and under conditions described to control or partially control weeds and woody plants listed in the "Weeds Controlled" section in industrial, recreational and public areas or other similar aquatic or terrestrial sites on this label.

Noncrop Sites

This product may be used to control the listed weeds in and around aquatic sites and on noncrop sites such as :

Airports
Golf Courses
Habitat Restoration & Management Areas
Highways & Roadsides
Industrial Plant Sites
Lumberyards
Parking Areas
Parks
Petroleum Tank Farms
Pipeline, Power, Telephone & Utility Rights-of-Way
Pumping Installations
Railroads
Schools
Storage Areas
Similar Sites

Aquatic Sites

This product may be applied to emerged weeds in all bodies of fresh and brackish water which may be flowing, nonflowing or transient. This includes 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 which 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 state fish and game agency and water control authorities before applying this product to public water. Permits may be required to treat such water.
- **NOTE:** 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 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 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 applications. This restriction does not apply to intermittent inadvertent overspray of water in terrestrial use sites.
- For treatments after drawdown of water or in dry ditches, allow 7 or more days after treatment before reintroduction of water to achieve maximum weed control. Apply this product within 1 day after drawdown to ensure application to actively growing weeds.

- Floating mats of vegetation may require retreatment. 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.

Forestry Sites and Utility Rights-of-Way

In forest and utility sites, this product is recommended for the control or partial control of woody brush, trees, and annual and perennial herbaceous weeds. This product is also recommended for use in preparing or establishing wildlife openings within these sites, in pine straw plantations for maintaining logging roads, and for side trimming along utility rights-of-way.

In forestry sites, this product is recommended for use in site preparation prior to planting any tree species, including Christmas trees and silvicultural nursery sites.

In utility sites, this product is recommended for use along electrical power, pipeline, and telephone rights-of-way, and in other utility sites associated with these rights-of-way, such as substations.

Application Rates [1]:

Method of Application	Application Rate	Spray Volume (gal/acre)
Broadcast		
Aerial	1.5 to 7.5 qt/acre	5 to 30
Ground	1.5 to 7.5 qt/acre	10 to 60
Spray-to-Wet		
Handgun, Backpack Mistblower	0.75 to 2% by volume	spray-to-wet
Low Volume Directed Spray [11] Handgun, Backpack Mistblower	5% to 10% by volume	partial coverage

[1] Where repeat applications are necessary, do not exceed 8.0 quarts per acre per year.

[11] For low volume directed spray applications, coverage should be uniform with at least 50 percent of the foliage contacted. For best results, coverage of the top one-half of the plant is important.

In forestry site preparation and utility rights-of-way applications, this product requires use with a surfactant such as a non-ionic surfactant containing greater than 80 percent active ingredient. Use of this product without surfactant will result in reduced herbicideperformance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Use higher rates of this product within the recommended rate ranges 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 recommended rate range to control of perennial herbaceous weeds from emergence up to the appearance of seedheads, flowers or berries appear. Use lower rates within the recommended 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 Mixtures

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 on the mixture. Any recommended 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. For side trimming treatments in utility rights-of-way, tank mixtures with Arsenal 2WSL herbicide are not recommended. For side trimming treatments, it is recommended that this product be used alone as recommended, or as a tank mix with Garlon.

Product	Broadcast Rate	Use Sites
Arsenal Applicators Concentrate	2 to 16 fl oz/acre	Forestry site preparation
Oust	1 to 4 oz/acre	Forestry site preparation, utility sites
Garlon 3A [1]	1 to 4 qt/acre	Forestry site preparation, utility sites
Garlon 4	1 to 4 qt/acre	Forestry site preparation, utility sites
Arsenal 2WSL	2 to 32 fl oz/acre	Utility sites
	Spray-to-Wet Rates	
Arsenal Applicators Concentrate	1/32% to ½% by volume	Forestry site preparation
Arsenal 2WSL	1/32% to ½% by volume	Utility sites
	Low Volume Directed Spray Rates	
Arsenal Applicators Concentrate	1/8% to 1/2% by volume	Forestry site preparation
Arsenal 2WSL	1/8% to 1/2% by volume	Utility sites

[1] Ensure that Garlon 3A is thoroughly mixed with water before adding this product. Agitation is required while mixing this product with Garlon 3A to avoid compatibility problems.

For control of herbaceous weeds, use the lower recommended tank mixture rates. For control of dense stands or difficult-to-control woody brush and trees, use the higher recommended rates.

Forestry Conifer and Hardwood Release

Directed Sprays and Selective Equipment

This product may be applied as a directed spray or by using selective equipment in forestry conifer and hardwood sites, including Christmas tree plantations and silvicultural nurseries. This product requires use with a surfactant. 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. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.
Tank Mixing: In hardwood plantations, tank mixtures with Oust may be used. In pine plantations, tank mixtures with Garlon 4 or Arsenal AC may be used. Comply with all site restrictions, forestry species limitations, and precautions on the tank mix product labels.

Avoid contact of spray drift, mist or drips with foliage, green bark or non-woody surface roots of desirable plant species. See "Application Equipment and Techniques" section of this label for specific recommendations and precautions.

Spray-to-Wet Applications: Use a 2 percent spray solution to control undesirable woody brush and trees. To control herbaceous weeds, use a 1 to 2 percent spray solution.

Low Volume Directed Spray Applications: Use a 5 to 10 percent spray solution. Coverage should be uniform with at least 50 percent of the foliage contacted. Coverage of the top one-half of the unwanted vegetation is important.

Broadcast Applications: For equipment calibrated for broadcast applications, use 1 1/2 to 7 1/2 quarts of this product per acre. Apply in 10 to 60 gallons of clean water per acre. Shielded application equipment may be used to avoid contact of the spray solution with desirable plants. Shields should be adjusted to prevent spray contact with the foliage of green bark of desirable vegetation.

Wiper Application Equipment: See the "Selective Equipment" section of this label for equipment and application rate recommendations.

Broadcast Application

Note: Except where specifically recommended below, make broadcast applications of this product only where conifers have been established for more than one year.

Broadcast application must be made after formation of final conifer resting buds in the fall or prior to initial bud swelling in the spring.

Injury may occur to conifers treated for release, especially where spray patterns overlap or the higher rates are applied. Damage can be accentuated if applications are made when conifers are actively growing, or are under stress from drought, flood water, improper planting, insects, animal damage or diseases.

This product requires use with a surfactant. Use a surfactant that is labeled/recommended for use in over-the-top release applications. Use of this product without a surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

For release of the following conifer species outside the Southeastern United States:

Douglas fir (*Pseudotsuga menziesii*)
Fir (*Abies* species)
Hemlock [††] (*Tsuga* species)
Pines [†] (*Pinus* species)
Redwood, California [††] (*Sequoia* species)

[†] Includes all species except loblolly pine, longleaf pine, shortleaf pine or slash pine.
[††] Use of a surfactant is not recommended for release of hemlock species or California redwood. In mixed conifer stands, injury to these species may result if a surfactant is used.

Application Rate for Conifer Release: Apply 3/4 to 1 1/2 quarts per acre as a broadcast spray. In Maine and New Hampshire, up to 2 1/4 quarts per acre of this product may be used for the control and suppression of difficult-to-control hardwood species.

To release Douglas fir, and pine and spruce species at the end of the first growing season (except in California), apply 3/4 to 1 1/8 quarts per acre of this product. Make sure that all conifers are well hardened off.

Note: For release of Douglas fir with this product or recommended tank mixtures, a nonionic surfactant recommended for over-the-top foliar spray may be used. To avoid possible conifer injury, nonionic surfactants may be used at 2 fluid ounces per acre at elevations above 1500 feet, or 1 fluid ounce per acre in the coastal range or at elevations below 1500 feet. Use of surfactant rates exceeding those listed above may result in unacceptable conifer injury and are not recommended. Make sure that the nonionic surfactant has been adequately tested for safety to Douglas fir before use.

Tank Mixtures with Oust: To release jack pine, white pine and white spruce, apply 3/4 to 1 1/2 quarts of this product with 1 to 3 ounces (1 to 1 1/2 ounces for white pine) of Oust per acre. Make applications to actively growing weeds as a broadcast spray over the top of established conifers. Applications at these rates should be made after formation of conifer resting buds in the late summer or fall.

Tank Mixtures with Arsenal Applicators Concentrate: This product may be tank mixed with Arsenal Applicators Concentrate for release of Douglas fir. Tank mix 3/4 to 1 1/8 quarts of this product with 2 to 6 fluid ounces of Arsenal Applicators Concentrate per acre. For release of balsam fir and red spruce, apply a mixture of 1 1/2 quarts of this product with 1 to 2 1/2 fluid ounces of Arsenal Applicators Concentrate per acre.

In Maine and New Hampshire 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, up to 2 1/4 quarts per acre of this product may be tank mixed with 1 to 2 1/2 fluid ounces per acre of Arsenal Applicators Concentrate herbicide and applied as a broadcast spray.

Tank mixtures with Arsenal Applicators Concentrate and Oust or Oust XP Herbicides: 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 weed densities, tough-to-control brush and where maples make up a large component of the undesirable trees up to 2 1/4 quarts per acre of this product may be tank mixed with 1 to 2.5 fluid ounces per acre of Arsenal Applicators Concentrate and 1 to 3 oz of Oust or Oust XP herbicides and applied as a broadcast spray.

For release of the following conifer species in the Southeastern United States:

Loblolly pine (*Pinus taeda*)
Eastern white pine (*Pinus strobus*)
Shortleaf pine (*Pinus echinata*)
Slash pine (*Pinus elliottii*)
Virginia pine (*Pinus virginiana*)
Longleaf pine (*Pinus palustris*)

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 recommended tank mixture.

Tank Mixtures with Arsenal Applicators Concentrate: For conifer release, apply 3/4 to 1 1/2 quarts of this product with 2 to 16 fluid ounces 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 recommended rates for dense tough-to-control wood brush and trees.

Read and observe label claims, cautionary statements and all information on the labels of each product used in these tank mixtures. Use according to the most restrictive precautionary statements for each product in the mixture.

Herbaceous Release

When applied as directed, this product plus listed residual herbicides provides 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.

Tank Mixtures with Oust: To release loblolly pines, tank mix 12 to 18 fluid ounces of this product with 2 to 4 ounces of Oust per acre.

To release slash pines, tank mix 9 to 12 fluid ounces of this product with 2 to 4 ounces of Oust per acre.

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 per acre of this product may be tank mixed with 1 to 3 oz of Oust herbicide or Oust XP herbicide to control grass, herbaceous weeds and woody brush, and applied as a broadcast spray.

For tank mixtures with Oust use a surfactant that is labeled recommended for use in over-the-top herbaceous release applications. Use of this product without a surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Weed control may be reduced if water volumes exceed 25 gallons per acre for these treatments.

Tank Mixture with Atrazine: To release Douglas fir, apply 3/4 quart of this product with 4 pounds a.i. of atrazine per acre. 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 mixture.

Always read and follow the manufacturer's label for all herbicides and surfactants used.

Wetland Sites

This product may be used in and around water (aquatic areas) and wetlands found in forestry and in power, telephone and pipeline rights-of-way sites, including where these sites are adjacent to or surrounding domestic water supply reservoirs, supply streams, lakes and ponds. Read and observe the following before making applications in and around water.

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

There is no restriction on the use of treated water for irrigation, recreation or domestic purposes.

Note: Do not apply this product directly to water within 1/2 mile up-stream 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 for a minimum period of 48 hours after application. 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. 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. The maximum application rate of 3 3/4 quarts per acre must not be exceeded in a single over-water broadcast application except as follows, where any recommended rate may be applied:

- Stream crossings in utility right-of-way.
- Where applications will result in less than 20 percent of the total water area being treated.

Wildlife Habitat Restoration and Management Areas

This product is recommended for the restoration and/or maintenance of native habitat and in wildlife management areas.

Habitat Restoration and Maintenance: When applied as directed, exotic and other undesirable vegetation may be controlled in habitat management areas. Applications may be made to allow recovery of native plant species, to open up water to attract waterfowl, and for similar broad-spectrum vegetation control requirements in habitat management areas. Spot treatments may be made to selectively remove unwanted plants for habitat enhancement. For spot treatments, care should be exercised to keep spray off of desirable plants.

Wildlife Food Plots: This product may be used as a site preparation treatment prior to planting wildlife food plots. Apply as directed to control vegetation in the plot area. Any wildlife food species may be planted after applying this product, or native species may be allowed to reinfest the area. If tillage is needed to prepare a seedbed, wait 7 days after applying this product before tilling to allow for maximum effectiveness.

Wiper Applications

For wick or wiper applications, mix 1 gallon of this product with 2 gallons of clean water to make a 33 percent solution. Addition of a nonionic surfactant at a rate of 10 percent by volume of total herbicide solution is recommended.

Wiper applications can be used to control or suppress annual and perennial weeds listed on this label. In heavy weed stands, a double application in opposite directions may improve results. See the "Weed Controlled" section in this label for recommended timing, growth stage and other instructions for achieving optimum results

Cut Stump Application

Woody vegetation may be controlled by treating freshly cut stumps of trees and resprouts with this product. Apply this product using suitable equipment to ensure coverage of the entire cambium. Cut vegetation close to the soil surface. **Apply a 50 to 100 percent solution of this product to freshly cut surface immediately after cutting.** Delay in applying this product may result in reduced performance. For best results, trees should be cut 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.*
Coyote brush [1]	*Baccharis consanguinea*
Dogwood [1]	*Cornus spp.*
Eucalyptus	*Eucalyptus spp.*
Hickory [1]	*Carya spp.*
Madrone	*Arbutus menziesii*
Maple [1]	*Acer spp.*
Oak	*Quercus spp.*
Poplar [1]	*Populus spp.*
Reed, giant	*Arundo donax*
Salt cedar	*Tamarix spp.*
Sweet gum [1]	*Liquidambar styraciflua*
Sycamore [1]	*Platanus occidentalis*
Tan oak	*Lithocarpus densiflorus*
Willow	*Salix spp.*

[1] This product is not approved for this use on these species in the state of California.

Injection and Frill Applications

Woody vegetation may be controlled by injection or frill application of this product. Apply this product using suitable equipment which must penetrate into living tissue. Apply the equivalent of 1 ml of this product per 2 to 3 inches of trunk diameter. This is best achieved by applying 25 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 dilute material to a continuous frill or more closely spaced cuttings. Avoid application techniques that allow runoff to occur from frill or cut areas in species that exude sap freely after frills or cutting. In species such as these, make frill or cut at an oblique angle so as to produce a cupping effect and use undiluted material. For best results, applications should be made during periods of active growth and full leaf expansion.

This treatment will control the following woody species:

Common Name	Scientific Name
Oak	*Quercus spp.*
Poplar	*Populus spp.*
Sweet gum	*Liquidambar styraciflua*
Sycamore	*Platanus occidentalis*

This treatment will suppress the following woody species:

Common Name	Scientific Name
Black gum [1]	*Nyssa sylvatica*
Dogwood	*Cornus spp.*
Hickory	*Carya spp.*
Maple, red	*Acer rubrum*

[1] This product is not approved for this use on this species in the state of California.

Release of Bermudagrass or Bahiagrass on Noncrop Sites

Release Of Dormant Bermudagrass And Bahiagrass

When applied as directed, this product will provide control or suppression of many winter annual weeds and tall fescue for effective release of dormant bermudagrass or bahiagrass. Make applications to dormant bermudagrass or bahiagrass.

For best results on winter annuals, treat when weeds are in an early growth stage (below 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.

Weeds Controlled

Rate recommendations for control or suppression of winter annuals and tall fescue are listed below.

Apply the recommended rates of this product in 10 to 25 gallons of water per acre plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Weeds Controlled or Suppressed [1]

Note: C = Controlled; S = Suppressed

	Rate (Fluid Ounces Per Acre)					
Weed Species	**6**	**9**	**12**	**18**	**24**	**48**
Barley, little *Hordeum pusillum*	S	C	C	C	C	C
Bedstraw, catchweed *Galium aparine*	S	C	C	C	C	C
Bluegrass, annual *Poa annua*	S	C	C	C	C	C
Chervil *Chaerophyllum tainturieri*	S	C	C	C	C	C
Chickweed, common *Stellaria media*	S	C	C	C	C	
Clover, crimson *Trifolium incarnatum*	•	S	S	C	C	C
Clover, large hop *Trifolium campestre*	•	S	S	C	C	C
Speedwell, corn *Veronica arvensis*	S	C	C	C	C	C
Fescue, tall *Festuca arundinacea*	•	•	•	•	S	S
Geranium, Carolina *Geranium carolinianum*	•	•	S	S	C	C
Henbit *Lamium amplexicaule*	•	S	C	C	C	C
Ryegrass, Italian *Lolium multiflorum*	•	•	S	C	C	C
Vetch, common *Vicia sativa*	•	•	S	C	C	C

[1] These rates apply only to sites where an established competitive turf is present.

Release Of Actively Growing Bermudagrass

NOTE: Use only on sites where bahiagrass or bermudagrass are desired for ground cover and some temporary injury or yellowing of the grasses can be tolerated.

When applied as directed, this product will aid in the release of bermudagrass by providing control of annual species listed in the "Weeds Controlled" section in this label, and suppression or partial control of certain perennial weeds.

For control or suppression of those annual species listed in this label, use 3/4 to 2 1/4 pints of this product as a broadcast spray in 10 to 25 gallons of spray solution per acre, plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. Use the lower rate when treating annual weeds below 6 inches in height (or length of runner in annual vines). Use the higher rate as size of plants increases or as they approach flower or seedhead formation.

Use the higher rate for partial control or longer-term suppression of the following perennial species. Use lower rates for shorter-term suppression of growth.

Bahiagrass	Johnsongrass [1]
Dallisgrass	Trumpetcreeper [11]
Fescue (tall)	Vaseygrass

[1] Johnsongrass is controlled at the higher rate.
[11] Suppression at the higher rate only.

Use only on well-established bermudagrass. Bermudagrass injury may result from the treatment but regrowth will occur under moist conditions. Repeat applications in the same season are not recommended, since severe injury may result.

Bahiagrass Seedhead and Vegetative Suppression

When applied as directed in the "Noncrop Sites" section in this label, this product will provide significant inhibition of seedhead emergence and will suppress vegetative growth for a period of approximately 45 days with single applications and approximately 120 days with sequential applications.

Apply this product 1 to 2 weeks after full green-up of bahiagrass or after the bahiagrass has been mowed to a uniform height of 3 to 4 inches. Applications must be made prior to seedhead emergence. Apply 5 fluid ounces per acre of this product in 10 to 25 gallons of water per acre, plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Sequential applications of this product plus nonionic surfactant may be made at approximately 45-day intervals to extend the period of seedhead and vegetative growth suppression. For continued vegetative growth suppression, sequential applications must be made prior to seedhead emergence.

Apply no more than 2 sequential applications per year. As a first sequential application, apply 3 fluid ounces of this product per acre plus nonionic surfactant. A second sequential application of 2 to 3 fluid ounces per acre plus nonionic surfactant may be made approximately 45 days after the last application.

Annual Grass Growth Suppression

For growth suppression of some annual grasses, such as annual ryegrass, wild barley and wild oats growing in coarse turf on roadsides or other industrial areas, apply 3 to 4 ounces of this product in 10 to 40 gallons of water per acre plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. . Applications should be made when annual grasses are actively growing and before the seedheads are in the boot stage of development. Treatments made after seedhead emergence may cause injury to the desired grasses.

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. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations 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. 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 fullest extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

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.

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 fullest 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 above 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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Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

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EPA-accepted 07/13/06

Revisions:

1. Updated Storage and Disposal

ARSENAL®

SPECIMEN

herbicide

For the control of undesirable vegetation in grass pasture, rangeland and noncropland areas such as railroad, utility, pipeline and highway rights-of-way, utility plant sites, petroleum tank farms, pumping installations, fence rows, storage areas, non-irrigation ditchbanks and other similar areas 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)	28.7%
Other Ingredients:	71.3%
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
U.S. Patent No. 4,798,619

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** and **Conditions of Sale and Warranty.**

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 on skin	• 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 first 5 minutes, then continue rinsing eye. • 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.
HOT LINE 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
CAUTION

Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment (PPE):
Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for **Category A** on an EPA chemical-resistant category selection chart.

Applicators and other handlers must wear:
- Long-sleeve 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 for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:
Users Should: • Wash hands before eating, chewing gum, using tobacco or using the toilet. • Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

PHYSICAL AND CHEMICAL HAZARDS

Spray solutions of **Arsenal® 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** or spray solutions of **Arsenal** in unlined steel (except stainless steel) containers or spray tanks.

ENVIRONMENTAL HAZARDS

DO NOT apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. **DO NOT** contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Arsenal should be used only in accordance with recommendations 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: • Coveralls. • Shoes plus socks. • Chemical resistant gloves made of any waterproof material.

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.

Noncrop weed control is not within the scope of the Worker Protection Standard. See the **GENERAL INFORMATION** section of this label for a description of noncrop sites.

DO NOT enter treated areas without protective clothing 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 may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

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.

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)

IMPORTANT

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® herbicide**, unless this risk is acceptable. **DO NOT** side trim desirable vegetation with this product unless severe injury or plant death can be tolerated. Prevent drift of spray to desirable plants.

Clean application equipment after using this product by thoroughly flushing with water.

GENERAL INFORMATION

Use Sites: Arsenal is an aqueous solution to be mixed with water and a surfactant and applied as a spray solution to grass pasture and rangeland and noncropland areas such as 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. **Arsenal** is recommended for the establishment and maintenance of wildlife openings. **Arsenal** 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 will control most annual and perennial grasses and broadleaf weeds in addition to many brush and vine species and **Arsenal** will provide residual control of labeled weeds which 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 **Adjuvant** Section for specific recommendations). These solutions may be applied selectively by using low-volume techniques or may be applied broadcast by using ground equipment or aerial equipment. In addition, **Arsenal** may also be used for stump and cut stem treatments (see specific directions).

Herbicidal Activity: Arsenal 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 two weeks after application. Complete kill of plants may not occur for several weeks. Applications of **Arsenal® herbicide** are rainfast one hour after treatment.

PRECAUTIONS FOR AVOIDING INJURY TO NON-TARGET PLANTS

Untreated trees can occasionally be affected by root uptake of **Arsenal** through movement into the top soil. Injury or loss of desirable trees or other plants may result if **Arsenal** 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.

MANAGING OFF-TARGET MOVEMENT

The following information is provided as general guidance for managing off-target movement. Specific use recommendations for **Arsenal** may differ depending on the application technique used and the vegetation management objective.

Spray Drift: 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.

Spray drift from applying this product may result in damage to sensitive plants adjacent to the treatment area. Only apply this product when the potential for drift to these and other adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, or non-target crops) is minimal. Do not apply when the following conditions exist that increase the likelihood of spray drift from intended targets: high or gusty winds, high temperatures, low humidity, temperature inversions.

To minimize spray drift, the applicator should be familiar with and take into account the following drift reduction advisory information. Additional information may be available from state enforcement agencies or the Cooperative Extension on the application of this product.

The best drift management strategy and most effective way to reduce drift potential are to apply large 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 recommended practice. Significant deflection from the 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. **DO NOT** use nozzles producing a mist droplet spray.

Application Height: Making applications at the lowest possible height (aircraft, ground driven spray boom) that is safe and practical 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 application equipment (e.g. aircraft, ground) upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller droplets, etc.).

Wind: Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Application should be avoided below 3 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: Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud, which can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be

identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

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.

Aerial Application Methods and Equipment: Use 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.

Managing spray drift from aerial applications: Applicators must follow these requirements to avoid off-target drift movement: 1) boom length - the distance of the outermost nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor, 2) nozzle orientation - nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees, and 3) application height - without compromising aircraft safety, applications should made at a height of 10 feet or less above the crop canopy or tallest plants. Applicators must follow the most restrictive use cautions to avoid drift hazards, including those found in this labeling as well as applicable state and local regulations and ordinances.

Ground Application (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.

ADJUVANTS

Postemergence applications of Arsenal® herbicide require the addition of a spray adjuvant for optimum herbicide performance.

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 **Arsenal** 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.

BRUSH CONTROL

AERIAL APPLICATIONS:

All precautions should be taken to minimize or eliminate spray drift. Fixed wing aircraft and helicopters can be used to apply **Arsenal**, 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. To avoid drift, applications should not be made during inversion conditions, when winds are gusty, or any other conditions which allow drift. Side trimming is not recommended with **Arsenal** unless death of treated tree can be tolerated.

Uniformly apply the recommended amount of **Arsenal** in 5 to 30 gallons of water per acre; include in the spray solution a nonionic surfactant or methylated seed oil or manufacturer's label rate of a silicone-based surfactant (See the **Adjuvant** 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:

IMPORTANT: 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® herbicide** per acre in combination with recommended tank mixes. It is not recommended to use rates higher than 3 pints per acre in these situations as injury or death of desirable trees may occur when their roots extend into treated zones.

Side Trimming:
DO NOT side trim with **Arsenal** 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.

Low Volume:
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 **Adjuvant** 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** per acre. Excessive wetting of foliage is not recommended. See the Mixing Guide below for some suggested volumes of **Arsenal** and water.

SUGGESTED TANK MIXES AND APPLICATION RATES*

Target Vegetation	Rate of Arsenal® herbicide	Tank Mix
Mixed hardwoods without elm, locust, or pine	1.0 - 1.5% by volume	Surfactant
Mixed hardwoods containing elm, locust, and pine	0.5 - 1.0% by volume	**Accord®** at 2 - 3% by volume plus surfactant
Mixed hardwoods with locust and pine but no elm	0.5 - 1.0% by volume	**Krenite®** at 2 - 5% by volume plus surfactant
Mixed hardwoods with locust and elm but no pine	0.5 - 1.0% by volume	**Escort®** at 2 oz/Acre or 2.3 grams/gal plus surfactant

*Tank mixes with 2,4-D or products containing 2,4-D have resulted in reduced efficacy of **Arsenal**.

MIXING CHART

% Solution	Amount Arsenal per Gallon of Mix	Amount Arsenal per 4 Gallon Backpack
0.5%	0.6 oz	2.6 oz
1.0%	1.3 oz	5.1 oz
2.0%	2.6 oz	10.2 oz
3.0%	3.8 oz	15.4 oz
5.0%	6.4 oz	25.6 oz

MEASURING CHART

128 ounces	=	1 gallon
16 ounces	=	1 pint
8 pints	=	1 gallon
4 quarts	=	1 gallon
2 pints	=	1 quart

Application Tips: For low volume, 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 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.

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

Low Volume with Hydraulic Handgun Application Equipment:
Use same technique as described above 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 which 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 BEING PREPARED	DESIRED CONCENTRATION (fluid volume)				
	0.5%	0.75%	1%	1.5%	5%
	(amount of Arsenal® herbicide to use)				
1 gallon	0.6 oz	0.9 oz	1.3 oz	1.9 oz	6.5 oz
3 gallons	1.9 oz	2.8 oz	3.8 oz	5.8 oz	1.2 pints
4 gallons	2.5 oz	3.8 oz	5.1 oz	7.7 oz	1.6 pints
5 gallons	3.2 oz	4.8 oz	6.5 oz	9.6 oz	2 pints
50 gallons	2 pints	3 pints	4 pints	6 pints	10 quarts
100 gallons	4 pints	6 pints	8 pints	6 quarts	5 gallons
2 tablespoons = 1 fluid ounce					

High Volumes:
For optimum performance when spraying medium 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 run-off, causing increased ground cover injury, and injury to desirable species. To prepare the spray solution, thoroughly mix **Arsenal® herbicide** at a rate of 2 to 6 pints per acre (see **Important** section under **Ground Applications**) 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 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** per acre. Uniformly cover the foliage of the vegetation to be controlled but do not apply to run-off. Excessive wetting of foliage is not recommended.

TANK MIXES FOR BRUSH CONTROL

Arsenal may be tank mixed with **Accord®**, **Roundup®**, **Krenite®**, **Escort®**, **Telar®**, **Tordon® K**, **Garlon® 3A**, **Banvel®**, and **Vanquish®** to provide control of **Arsenal** 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 have resulted in reduced performance of **Arsenal**.

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 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.

CUT STUBBLE

Arsenal 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** at the rate of 1 to 2 pints per acre to the cut area. **Arsenal** 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** 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.

STUMP AND CUT STEM TREATMENTS

Arsenal may be used to control undesirable woody vegetation on noncropland by applying the **Arsenal** 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 run-off or puddling.

Mixing: Arsenal 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** 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 **Arsenal** 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. Insure 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 one inch intervals between cut edges. Insure 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 two 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 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.

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 one 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® herbicide 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 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** applications as soon as possible. **DO NOT** apply where the chemical may contact the roots of desirable trees or other plants.

The product is not recommended for use under pavement on residential properties such as driveways or parking lots, nor is it recommended 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 or so-called drip line.

APPLICATION DIRECTIONS FOR PAVED SURFACES

Applications should be made 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 gal. per acre) to ensure thorough and uniform wetting of the soil surface, including the shoulder areas. Add **Arsenal** at a rate of 6 pints per acre (2.2 fluid ounce 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** is needed for herbicide activation. **Arsenal** 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 may be used on unimproved bermudagrass and bahiagrass turf such as roadsides, utility rights-of-way and other non-cropland industrial sites. The application of **Arsenal** 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 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 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** at 6 to 12 oz per acre when the bermudagrass is dormant. Apply **Arsenal** at 6 to 8 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 (See **IMPORTANT** statement above).

For additional pre-emergence control of annual grasses and small seeded broadleaf weeds, add **Pendulum® herbicide** at the rate of 3.3 to 6.6 lbs 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** at 8 oz per acre plus **Roundup®** at 12 oz per acre plus surfactant. For additional control of broadleaves and vines, **Garlon® 3A** may be added to the above mix at the rate of 1-2 pints per acre. Observe all precautions and restrictions on the **Garlon 3A** and **Roundup** labels.

Bahiagrass - Apply **Arsenal** at 4 to 8 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 recommendations on surfactants).

WEEDS CONTROLLED

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

Arsenal may be used to suppress growth and seedhead development of certain turfgrass in unimproved areas. When applied to desirable turf, **Arsenal** 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 **Arsenal® herbicide** at 6 to 8 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 **Arsenal** at 2 oz per acre plus 0.25% nonionic surfactant. For increased suppression, **Arsenal** may be tank mixed with such products as **Campaign®** (24 oz per acre) or **Embark®** (8 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 **Arsenal**.

TOTAL VEGETATION CONTROL WHERE BAREGROUND IS DESIRED

Arsenal is an effective herbicide for pre-emergence or postemergence control of many annual and perennial broadleaf and grass weeds where bareground 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 **Roundup®**, **Finale®**, **MSMA**, **Karmex®**, **Pendulum®**, simazine, **Banvel®**, **Vanquish®**, or **Oust®** herbicides. The degree and duration of control are dependent on the rate of **Arsenal** 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 more restrictive label when making an application involving tank mixes.

TANK MIX RECOMMENDATIONS FOR BAREGROUND

Herbicide Rates per Acre*

Arsenal herbicide Rate in pints	**Pendulum WDG** in lbs	**Pendulum 3.3 EC** in Quarts	Diuron in lbs ai
1.5 - 3	6.6	4.8	4 - 6
2 - 4	6.6	4.8	6 - 10
3 - 6	6.6	4.8	8 - 12

* Use higher rates for fall applications and in areas that have not been previously treated or that feature heavy infestations.

Applications of **Arsenal** 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.

Postemergence Applications: Always use a spray adjuvant (See **Adjuvant** 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** may be tank mixed with products such as **Roundup**, **Finale**, or **MSMA**. Tank mixes with 2,4-D or products containing 2,4-D have reduced performance of **Arsenal**. Always follow the more restrictive label when tank mixing.

Spot Treatments: 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**, **Finale**, **MSMA**, 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** may be applied as a spot treatment at a rate of 2 to 48 fluid oz of product per treated acre using any of the described ground application methods. Spot applications to grass pasture and rangeland may not exceed one tenth 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 oz per acre per year.

Grazing and haying restrictions: There are no grazing restrictions following **Arsenal** application. **DO NOT** cut forage grass for hay for seven days after **Arsenal** application.

GUIDELINES FOR RANGELAND USE

Arsenal may be applied to rangeland for the control of undesirable vegetation in order to achieve one or more of the following vegetation management objectives:

1. The control of undesirable (non-native, invasive and noxious) plant species
2. The control of undesirable vegetation in order to aid in the establishment of desirable rangeland plant species.
3. The control of undesirable vegetation in order to aid in the establishment of desirable rangeland vegetation following a fire.
4. The control of undesirable vegetation for purposes of wildfire fuel reduction.
5. The release of existing desirable rangeland plant communities from the competitive pressure of undesirable plant species.
6. The control of undesirable vegetation for purposes of wildlife habitat improvement.

To ensure the protection of threatened and endangered plants when applying **Arsenal® herbicide** 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.

Please see the appropriate section(s) of this label for specific use directions for the desired rangeland vegetation management objective.

Arsenal 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 GUIDELINE

Rotational crops may be planted twelve months after applying **Arsenal** at the recommended pasture and rangeland rate. Following twelve months after a **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.

WEEDS CONTROLLED BY ARSENAL

Arsenal will provide pre-emergence 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 pre-emergence or postemergence applications of **Arsenal**. **For established biennials and perennials, postemergence applications of Arsenal 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 **Arsenal** per acre than is shown for the broadcast treatments. **Arsenal** should be used only in accordance with the recommendations on this label and the leaflet 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** should be tank mixed or applied sequentially with an appropriate registered herbicide having a different mode of action to ensure control.

GRASSES

COMMON NAME	SPECIES	GROWTH HABIT[2]
	Apply 2-3 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	(*Sporobulus cryptandrus*)	A
Smooth brome	(*Bromus inermis*)	P
Vaseygrass	(*Paspalum urvillei*)	P
Wild oats	(*Avena fatua*)	A
Witchgrass	(*Panicum capillare*)	A
	Apply 3-4 pints per acre[1]	
Barnyardgrass[3]	(*Echinochloa crus-gali*)	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*)	A
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 4-6 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[1]	(*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 2-3 pints per acre[1]	
Alligatorweed	(*Alternanthera philoxeroides*)	A/P
Burdock	(*Arctium* spp.)	B
Carpetweed	(*Mollugo verticillata*)	A
Carolina geranium	(*Geranium carolinianum*)	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
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

BROADLEAF WEEDS *(continued)*

COMMON NAME	SPECIES	GROWTH HABIT[2]
	Apply 2-3 pints per acre[1]	
Wild turnip	(*Brassica campestris*)	B
Woollyleaf bursage	(*Franseria tomentosa*)	P
Yellow woodsorrel	(*Oxalis stricta*)	P
	Apply 3-4 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 aplexicaule*)	A
Knotweed, prostrate[1]	(*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
Shepherd's-purse[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
	Apply 4-6 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
Silverleaf nightshade	(*Solanum elaeagnifolium*)	P
Sowthistle	(*Sonchus* spp.)	A
Texas thistle	(*Cirsium texanum*)	P

VINES AND BRAMBLES

COMMON NAME	SPECIES	GROWTH HABIT[2]
	Apply 1 pint per acre	
Field bindweed	(*Convolvulus arvensis*)	P
Hedge bindweed	(*Calystegia sepium*)	A
	Apply 2-3 pints per acre[1]	
Wild buckwheat	(*Polygonum convolvulus*)	P
	Apply 3-4 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 bractreata*)	P
	Apply 4-6 pints per acre[1]	
Kudzu[6]	(*Pueraria lobata*)	P
Trumpetcreeper	(*Campsis radicans*)	P
Virginia creeper	(*Parthenocissus quinquefolia*)	P
Wild grape	(*Vitis* spp.)	P

BRUSH SPECIES

	Apply 4-6 pints per acre[1]	
American beech	(*Fagus grandifolia*)	P
Ash	(*Fraxinus* spp.)	P
Bald cypress	(*Taxodium distichum*)	P
Bigleaf Maple	(*Acer macrophylum*)	P
Black Locust[7]	(*Robinia pseudoacacia*)	P
Blackgum	(*Nyssa sylvatica*)	P
Boxelder	(*Acer negundo*)	P
Brazilian peppertree	(*Schinus terebinthifolius*)	P
Cherry	(*Prunus* spp.)	P
Chinaberry	(*Melia azadarach*)	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 quiquenervia*)	P
Mulberry	(*Morus* spp.)	P
Oak	(*Quercus* spp.)	P
Persimmon	(*Diospyros virginiana*)	P
Pine[10]	(*Pinus* spp.)	P
Poplar	(*Populus* spp.)	P
Privet	(*Ligustrum vulgare*)	P
Red AlderAlder	(*Alnus rubra*)	P
Red Maple	(*Acer rubrum*)	P
Russian Olive	(*Eleagnus angustifolia*)	P
Saltcedar	(*Tamarix ramosissima*)	P
Sassafras	(*Sassafras albidum*)	P

BRUSH SPECIES *(continued)*

Apply 4-6 pints per acre[1]

COMMON NAME	SPECIES	GROWTH HABIT[2]
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 pre-emergence control, tank mix with **Pendulum®**.
[4] Use a minimum of 75 GPA - Control of established stands may require repeat applications.
[5] For pre-emergence control, tank mix with **Pendulum, Karmex®**or diuron.
[6] For best results early postemergence applications are required.
[7] Tank mix with **Roundup®**, **Accord®**, **Escort®**, **Krenite®**, **Garlon® 3A or Tordon® K**.
[8] Tank mix with **Roundup**, **Accord**, or **Escort**.
[9] Tank mix with **Roundup**, **Accord**, **Garlon 3A**, or **Tordon K**.
[10] Tank mix with **Accord**, **Roundup**, **Garlon 3A**, **Tordon K**, or **Krenite**.

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.

To the extent consistent with applicable law, BASF makes no other express or implied warranty of fitness or merchantability or any other express or implied warranty.

To the extent consistent with applicable law, Buyer's exclusive remedy and BASF's exclusive liability, whether in contract, tort, negligence, strict liability, or otherwise, shall be limited to repayment of the purchase price of the product.

To the extent consistent with applicable law, BASF and the Seller disclaim any liability for consequential, 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. 0408

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BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF

The Chemical Company

SPECIMEN

ARSENAL® POWERLine™ herbicide

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.
HOT LINE 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 may 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.

Noncrop weed control is not within the scope of the Worker Protection Standard. See the **GENERAL INFORMATION** section of this label for a description of noncrop sites.

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 may be disposed of on-site or at an approved waste disposal facility.

CONTAINER DISPOSAL

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.

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. **DO NOT** reuse the container for any other purpose. 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.

IMPORTANT

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. Prevent drift of spray to desirable plants.

Clean application equipment after using this product by thoroughly flushing with water.

GENERAL 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 should 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. To avoid drift, applications should not be made during inversion conditions, when winds are gusty, or any other conditions which allow drift. 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** 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™ herbicide** 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.

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 seed-head 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 green-up. Applications made during green-up will delay green-up. 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® herbicide** at the rate of 3.3 lbs to 6.6 lbs 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 green-up but has not exceeded 25% green-up. Include in the spray solution a surfactant (see **ADJUVANTS** section for specific recommendations on surfactants).

Weeds Controlled

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*

GRASS GROWTH AND SEED-HEAD SUPPRESSION

Arsenal PowerLine may be used to suppress growth and seed-head 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 ozs to 8 ozs 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 **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® WDG herbicide	Pendulum® 3.3 EC herbicide	Diuron
Rate in pints	in lbs	in quarts	in lbs ai
1.5 to 3	6.6	4.8	4 to 6
2 to 4	6.6	4.8	6 to 10
3 to 6	6.6	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 bare-ground 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 BY ARSENAL POWERLINE

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.

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	(*Sporobulus 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-gali*)	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[4]	(*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	(*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
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

BROADLEAF WEEDS *(continued)*

Common Name	Species	Growth Habit[2]
	Apply 2 to 3 pints per acre[1] (continued)	
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[4]	(*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 aplexicaule*)	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[6]	(*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
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	(*Potamogeton pectinatus*)	P
Silverleaf nightshade	(*Solanum elaeagnifolium*)	P
Sowthistle	(*Sonchus* spp.)	A
Texas thistle	(*Cirsium texanum*)	P

VINES AND BRAMBLES

Common Name	Species	Growth Habit[2]
	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 bractreata*)	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]	
American beech	(*Fagus grandifolia*)	P
Ash	(*Fraxinus* spp.)	P
Bald cypress	(*Taxodium distichum*)	P
Bigleaf maple	(*Acer macrophylum*)	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 azadarach*)	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 quiquenervia*)	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	(*Eleagnus angustifolia*)	P
Saltcedar	(*Tamarix ramosissima*)	P
Sassafras	(*Sassafras albidum*)	P

BRUSH SPECIES *(continued)*

Apply 4 to 6 pints per acre[1] *(continued)*

Common Name	Species	Growth Habit[2]
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**.

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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BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
The Chemical Company

H - 65521

DuPont™ Escort® XP

herbicide

"..... A Growing Partnership With Nature"

DuPont™ Escort® XP

herbicide

Dry Flowable

Active Ingredient	*By Weight*
Metsulfuron methyl Methyl 2-[[[[(4-methoxy-6-methyl-1,3,5-triazin-2-yl)amino]-carbonyl]amino]sulfonyl]benzoate	60%
Inert Ingredients	40%
TOTAL	100%

EPA Reg. No. 352-439

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 this label, find someone to explain it to you in detail.)

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 further 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 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 1-800-441-3637 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION! Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist.

PERSONAL PROTECTIVE EQUIPMENT

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.

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 when cleaning equipment or disposing of equipment washwaters.

This herbicide is injurious to plants at extremely low concentrations. Nontarget plants may be adversely effected from drift and run-off.

IMPORTANT

DO NOT USE ON FOOD OR FEED CROPS EXCEPT AS RECOMMENDED BY THIS LABEL OR SUPPLEMENTAL LABELING. Injury to or loss of desirable trees or other plants may result if the precautions listed below are not followed.

- Do not apply DuPont™ ESCORT® XP herbicide (except as recommended), or 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 product may be washed or moved into contact with their roots.
- Do not use on lawns, walks, driveways, tennis courts, or similar areas.
- Prevent drift of spray to desirable plants.
- Do not contaminate any body of water, including irrigation water.
- Keep from contact with fertilizers, insecticides, fungicides and seeds.

Low rates of ESCORT® XP can kill or severely injure most crops. Following an ESCORT® XP application, the use of spray equipment to apply other pesticides to crops on which ESCORT® XP is not registered may result in their damage. The most effective way to reduce this crop damage potential is to use dedicated mixing and application equipment.

GENERAL INFORMATION

ESCORT® XP herbicide is a dispersible granule that is mixed in water and applied as a spray by ground or aerial application.

ESCORT® XP is recommended for the control of annual and perennial weeds and unwanted woody plants on private, public and military lands, on rights-of-way, industrial sites, non-crop areas, ditchbanks of dry drainage ditches, certain types of unimproved turf grass, and conifer and hardwood plantations, including grazed areas on these sites. Do not use on irrigation ditches.

ESCORT® XP controls weeds and woody plants primarily by postemergent activity. Although ESCORT® XP has preemergence activity, best results are generally obtained when ESCORT® XP is applied to foliage after emergence or dormancy break. Generally, for the control of annual weeds, ESCORT® XP provides the best results when applied to young, actively growing weeds. For the control of perennial weeds, applications made at the bud/bloom stage or while the target weeds are in the fall rosette stage may provide the best results. The use rate depends upon the weed species and size at the time of application.

The degree and duration of control may depend on the following:

- weed spectrum and infestation intensity
- weed size at application
- environmental conditions at and following treatment
- soil pH, soil moisture, and soil organic matter.

ESCORT® XP may be applied on conifer and hardwood plantations, and non-crop sites that contain areas of temporary surface water caused by the collection of water between planting beds, in equipment ruts, or in other depressions created by management activities. It is permissible to treat 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.

ENVIRONMENTAL CONDITIONS AND BIOLOGICAL ACTIVITY

ESCORT® XP is absorbed primarily through the foliage of plants, and by the roots to a lesser degree. Plant cell division is generally inhibited in sensitive plants within a few hours following uptake. Two to 4 weeks after application, leaf growth slows followed by discoloration and tissue death. The final affects on annual weeds are evident about 4 to 6 weeks after application. The ultimate affect on perennial weeds and woody plants occurs in the growing season following application.

Warm, moist conditions following treatment promote the activity of ESCORT® XP, while cold, dry conditions may reduce or delay activity. Weeds and brush hardened off by cold weather or drought stress may not be controlled.

The use of a surfactant is recommended to enhance the control of susceptible plants, except where noted. Apply at a minimum rate (concentration) of 1/4% volume/volume (1 quart per 100 gallons of spray solution), or at the manufacturer's recommended rate. Use only EPA approved surfactants containing at least 80% active ingredient. Certain types of surfactants, such as those incorporating acetic acid (i.e. LI- 700), may not be compatible with ESCORT® XP and may result in decreased performance. Certain surfactants may not be suitable for use on desirable plants, such as turf and conifers, listed on this label. Consult the surfactant manufacturer's label for appropriate uses.

Weed and brush control may be reduced if rainfall occurs soon after application.

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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
DuPont™ ESCORT® XP should be used only in accordance with recommendations on this label or in separately published DuPont recommendations.
DuPont will not be responsible for losses or damages resulting from the use of this product in any manner not specifically recommended by DuPont. User assumes all risks associated with such non-recommended use.
Do not apply more than 4 ounces of ESCORT® XP per acre per year.
Do not use on food or feed crops except as recommended by this label or supplemental 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 in your State responsible for pesticide regulation.

TANK MIXES

ESCORT® XP may be tank mixed with other herbicides registered for the use sites described in this label. Use only those tank mix partners which are labeled for the appropriate use site. When tank mixing, use the most restrictive label limitations for each of the products being used in the tank mix.

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 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
- Shoes plus socks

CONIFER PLANTATIONS

Application Information

ESCORT® XP is recommended for the control of many species of weeds and deciduous trees on sites where conifers are growing or are to be planted. Apply by ground equipment or by air (helicopter only). Refer to the "Weeds Controlled" and "Brush Species Controlled" for a listing of susceptible species.

Application Timing

Apply ESCORT® XP after weeds have emerged or after undesirable hardwoods have broken winter dormancy and have reached the point of full leaf expansion.

Conifer Site Preparation --Application Before Transplanting

After consulting the "Weeds Controlled" and "Brush Species Controlled" tables, apply the rates of ESCORT® XP recommended for the most difficult to control species on the site.

Southeast—Apply up to 4 ounces per acre for loblolly and slash pines. Transplant the following planting season.

Northeast and Lake States—Apply up to 2 ounces per acre for red pine. Transplant the following planting season. Apply up to 2 ounces per acre for black, white and Norway spruce. Transplant the following spring.

West—Apply up to 2 ounces per acre prior to planting Douglas Fir, Sitka Spruce, Western Red Cedar, Western Hemlock, Ponderosa Pine, and Grand Fir in the Coast Rangeland and western slope of the Cascades in Oregon and Washington. These conifer species listed can be planted anytime after application. Other conifer species can be planted providing the user has prior experience indicating acceptable tolerance to ESCORT® XP soil residues.

Without prior experience, it is recommended that other species be planted on a small scale to determine selectivity before large-scale plantings are made as unacceptable injury may occur. DuPont will not assume responsibility for injury to any conifer species not listed on this label.

Tank Mix Combinations—

For broader spectrum control, the following products are recommended in combination with DuPont™ ESCORT® XP.

Glyphosate (4 pound active per gallon)

Tank mix 1 to 2 ounces of ESCORT® XP with 2 to 10 quarts of glyphosate per acre. Refer to the product container for a list of species controlled.

Imazapyr (4 pound active per gallon)

Tank mix 1 to 2 ounces of ESCORT® XP with 10 to 24 fluid ounces of imazapyr per acre. Loblolly and slash pines may be transplanted the planting season following application. This combination controls ash, black gum, cherry, hawthorn, honeysuckle, hophornbeam, persimmon, oaks (red, white and water), sassafras, sweetgum, Vaccinium species, and suppresses blackberry, dogwood, elms, myrtle dahoon, hickories, and red maple.

Glyphosate (4 pound active per gallon) + Imazapyr (4 pound active per gallon)

Tank mix 1/2 to 1 ounce of ESCORT® XP with 16 to 64 fluid ounces of glyphosate and 10 to 12 fluid ounces of imazapyr per acre. Slash and loblolly pines may be transplanted the planting season following application. This combination controls cherry, dogwood, elms, oaks (red and water), persimmon, sassafras, sweetgum and suppresses hickory.

DuPont™ VELPAR® L or VELPAR® DF

Tank mix 1 to 2 ounces of ESCORT® XP per acre with VELPAR® L or VELPAR® DF at the rates recommended on the container for various soil textures. Loblolly and slash pines may be transplanted the planting season following application. Refer to the product container for a list of species controlled.

DuPont™ OUST® EXTRA

Tank mix 1/2 to 1 1/2 ounces of ESCORT® XP with 2 to 3 ounces of OUST® EXTRA per acre for herbaceous weed control. Refer to the product container and the "Weeds Controlled" section of this label for a listing of the weeds controlled. Loblolly and slash pines may be transplanted the planting season following application. Tank mix 2 ounces of ESCORT® XP with 3 ounces of OUST® EXTRA per acre for herbaceous weed control and early spring suppression of bull thistle and Canada thistle in the Coast Rangeland and western slope of the Cascade Mountains. Douglas fir may be transplanted at least 90 days following application.

Release--Hardwood Control and Suppression

ESCORT® XP is recommended for application over the top of established slash and loblolly pine to control the species listed in "Weeds Controlled" and "Brush Species Controlled" section of this label. Apply 1 to 4 ounces per acre to control the species indicated, including kudzu.

Tank Mix Combinations—

For broader spectrum control the following products are recommended in combination with ESCORT® XP.

Imazapyr (4 pound active per gallon)

Tank mix 1 to 2 ounces of ESCORT® XP with 8 to 16 fluid ounces of imazapyr per acre for application to loblolly pine. Refer to the imazapyr label regarding the use of surfactants and the appropriate application timing with respect to the age and development stage of the pines. This combination controls ash, black gum, cherry, hawthorn, honeysuckle, hophornbeam, oaks (red, white and water), sassafras, sweetgum, Vaccinium species, and suppresses blackberry, dogwood, elms, myrtle dahoon, hickories, persimmon, and red maple.

VELPAR® L or VELPAR® DF

Tank mix 1 to 2 ounces of ESCORT® XP with VELPAR® L or VELPAR® DF at the rates recommended on the container for various soil textures. This combination may be applied to loblolly and slash pines.

Release--Herbaceous Weed Control

ESCORT® XP may be applied to transplanted loblolly and slash pine for the control of herbaceous competition. Consult the "Weeds Controlled" for a listing of the susceptible species and recommended application rates. Best results are obtained when ESCORT® XP is applied just before weed emergence until shortly after weed emergence.

Tank Mix Combinations—

For broader spectrum control the following products are recommended in combination with ESCORT® XP.

Imazapyr (4 pound active per gallon)

Tank mix 1/2 to 1 ounce of ESCORT® XP with 4 fluid ounces of imazapyr per acre. The tank mix may be used on loblolly pine.

VELPAR® L or VELPAR® DF

Tank mix 1/2 to 1 ounce of ESCORT® XP with VELPAR® L or VELPAR® DF at the rates recommended on the container for various soil textures. This combination may be applied to loblolly and slash pines.

Release - Directed Spray in Conifers

Western US

To release conifers from competing brush species, such as, blackberry, salmonberry, snowberry, thimbleberry and wild roses, mix 2 to 4 ounces of ESCORT® XP per 100 gallons of spray solution. Direct spray onto the foliage of competing brush species using a knapsack or backpack sprayer. For best results, apply any time after the brush species have reached full leaf stage but before autumn coloration. At application, the majority of the brush species should be less than six feet in height to help ensure adequate spray coverage. Thorough coverage of the target foliage is necessary to optimize results. Care should be taken to direct the ESCORT® XP spray solution away from the conifer foliage.

NOTE:
DuPont™ ESCORT® XP may cause temporary yellowing and or growth suppression when the spray solution contacts conifer foliage. The use of a surfactant with ESCORT® XP may improve brush control results. When using a surfactant with ESCORT® XP, extra precaution must be taken to avoid contact with conifer foliage. Excessive drift onto conifers may result in severe injury.

IMPORTANT PRECAUTIONS —CONIFER PLANTATIONS ONLY

- Applications of ESCORT® XP made to conifers that are suffering from loss of vigor caused by insects, diseases, drought, winter damage, animal damage, excessive soil moisture, planting shock, or other stresses may injure or kill the trees.
- Applications of ESCORT® XP made for herbaceous release should only be made after adequate rainfall has closed the planting slit and settled the soil around the roots following transplanting.
- Do not apply ESCORT® XP to conifers grown as ornamentals.
- ESCORT® XP applications may result in damage and mortality to other species of conifers when they are present on sites with those listed in the preceding recommendations for conifer plantations.

HARDWOOD PLANTATIONS

Application Information
ESCORT® XP is recommended at rates of up to 2 ounces per acre for the control of many weed species on sites where yellow poplar is growing or is to be planted, and on sites where red alder is to be planted. Apply by ground equipment or by air (helicopter only). Refer to the "Weeds Controlled" sections of this label for a listing of susceptible species.

Application Timing
ESCORT® XP may be applied as a site preparation treatment prior to planting red alder or yellow poplar. As a prior to planting site preparation treatment for red alder, ESCORT® XP may be tank mixed with other herbicides labeled for this use.
ESCORT® XP may also be applied over-the-top of planted yellow poplar seedlings after the soil has settled around the root system, but before the seedlings have broken dormancy (prior to bud break).

Release--Herbaceous Weed Control

ESCORT® XP may be applied to yellow poplar for the control of herbaceous competition. Consult the "Weeds Controlled" for a listing of the susceptible species and recommended application rates. Best results are obtained when ESCORT® XP is applied just before weed emergence until shortly after weed emergence.

Tank Mix Combinations—
Tank mix 1/2 ounce of ESCORT® XP with 4 to 6 pints of DuPont™ VELPAR® L as recommended on the package label for "RELEASE--HERBACEOUS WEED CONTROL" in pine plantations in the eastern U.S. Follow the VELPAR® L label recommendations regarding altering the application rate by soil texture.

IMPORTANT PRECAUTIONS —HARDWOOD PLANTATIONS ONLY

- Application of VELPAR® L and ESCORT® XP made to yellow poplar that are suffering from loss of vigor caused by insects, disease, drought, winter damage, animal damage, excessive soil moisture, planting shock or other stresses may injure or kill the seedlings.
- Applications of ESCORT® XP made for release should only be made after adequate rainfall has closed the planting slit and settled the soil around the roots following transplanting.
- The use of surfactant is not recommended for applications made over the tops of trees.
- Careful consideration must be given by an experienced and knowledgeable forester to match the requirements of yellow poplar and/or red alder to the conditions of the site. Treatment of yellow poplar and/or red alder planted on a site inadequate to meet its requirements may injure or kill the seedlings.

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 others to enter the treated area until sprays have dried.
Non-crop industrial weed control and selective weed control in turf (industrial, unimproved only) are not within the scope of the Worker Protection Standard.

NON-CROP SITES

Application Information
ESCORT® XP is recommended for general weed control on private, public and military lands as follows: Uncultivated nonagricultural areas (such as airports, highway, railroad and utility rights-of-way, sewage disposal areas, etc.); uncultivated agricultural areas - non-crop producing (such as farmyards, fuel storage areas, fence rows, soil bank land, barrier strips, etc.); industrial sites - outdoor (such as lumberyards, pipeline and tank farms, etc.) including grazed areas on these sites. It is also recommended for the control of certain noxious and troublesome weeds.
Consult the "Weeds Controlled" and "Brush Species Controlled" tables to determine the appropriate application rate.
ESCORT® XP may be applied in tank mixture with other herbicides labeled for use on non-crop sites. Fully read the labels and follow all directions and restrictions on each label.

Applications may be made by ground or air. Use a sufficient volume of water to ensure thorough coverage of the target vegetation with the application equipment being used.

NATIVE GRASSES

DuPont™ ESCORT® XP is recommended for weed control and suppression in the establishment and maintenance of native grasses. It may be used where blue grama, bluestems (big, little, plains, sand, ww spar) bromegrasses (meadow), buffalograss, green sprangletop, indiangrass, kleingrass, lovegrasses (atherstone, sand, weeping, wilman), orchardgrass, sideoats grama, switchgrass (blackwell), wheatgrass (bluebunch, intermediate, pubescent Siberian, slender, streamband, tall, thickspike, western), and Russian wildrye are established. It may also be applied over these species in the seedling stage, except for orchardgrass and Russian wildrye.

Application Information

Apply ESCORT® XP at the rate of 1/10 ounce per acre for the control and suppression* of bur buttercup (testiculate), common purslane, common sunflower*, cutleaf eveningprimrose*, flixweed*, lambsquarters* (common and slimleaf), marestail*, pigweed (redroot and tumble), snow speedwell, tansymustard* and tumble mustard (Jim Hill mustard).

* Suppression is a visual reduction in weed competition (reduced population or vigor) as compared to untreated areas. Degree of suppression will vary with the size of weed and environmental conditions following treatment.

Application Timing

For established grasses, apply when weeds are in the seedling stage.

For grasses in the seedling stage, apply preplant or preemergence where the soil (seed bed) has been cultivated.

IMPORTANT PRECAUTIONS —NATIVE GRASSES

- Grass species or varieties may differ in their response to various herbicides. If no information is available, limit the initial use of ESCORT® XP to a small area. Components in a grass seed mixture will vary in tolerance to ESCORT® XP, so the final stand may not reflect the seed ratio.
- Under certain conditions such as heavy rainfall, high pH, prolonged cold weather, or wide fluctuations in day/night temperatures prior to or soon after ESCORT® XP application, temporary discoloration and/or grass injury may occur. ESCORT® XP should not be applied to grass that is stressed by severe weather conditions, drought, low fertility, water-saturated soils, disease, or insect damage as grass injury may result. Severe winter stress, drought, disease, or insect damage before or following application also may result in grass injury.

GRASS REPLANT INTERVALS

Following an application of ESCORT® XP to non-crop areas, the treated sites may be replanted with various species of grasses at the intervals recommended below.

For soils with a pH of 7.5 or less, observe the following replant intervals:

Species	Rate (ounces per acre)	Replant Interval (months)
Brome, Meadow	1/2—1	2
	1—2	3
Brome, Smooth	1/2—1	2
	1—2	4
Fescue, Alta	1/2—1	2
	1—2	4
Fescue, Red	1/2—1	2
	1—2	4
Fescue, Sheep	1/2—1	1
	1—2	4
Foxtail, Meadow	1/2—1	2
	1—2	4
Green Needlegrass	1/2—2	1
Orchardgrass	1/2—1	2
	1—2	4
Russian wildrye	1/2—1	1
	1	2
	2	3
Switchgrass	1/2—1	1
	1—2	3
Timothy	1/2—1	2
	1—2	4
Wheatgrass, Western	1/2—1	2
	1—2	3

For soils with a pH of 7.5 or greater observe the following replant intervals:

Species	Rate (ounces per acre)	Replant Interval (months)
Alkali Sacaton	1/2—1	1
	1—2	3
Bluestem, Big	1/2—2	3
Brome, Mountain	1/2—1	1
	1—2	2
Grama, Blue	1/2—2	1
Grama, Sideoats	1/2	2
	>1/2	>3
Switchgrass	1/2	2
	>1/2	>3
Wheatgrass, Thickspike	1/2—2	1
Wheatgrass, Western	1—2	2
	1/2—1	3

The recommended intervals are for applications made in the Spring to early Summer. Because ESCORT® XP degradation is slowed by cold or frozen soils, applications made in the late Summer or Fall should consider the intervals as beginning in the Spring following treatment. Testing has indicated that there is considerable variation in response among the species of grasses when seeded into areas treated with ESCORT® XP. If species other than those listed above are to be planted into areas treated with ESCORT® XP, a field bioassay should be performed, or previous experience may be used, to determine the feasibility of replanting treated sites.

ADDITIONAL GRASS INFORMATION APPLICATION INFORMATION FOR GRASS ESTABLISHMENT

DuPont™ ESCORT® XP is recommended for the control or suppression of broadleaf weeds to aid in the establishment of the following perennial native or improved grasses:

Blue Grama	Sideoats grama
Bluestems --	Switchgrass --
Big	Blackwell
Little	Wheatgrasses --
Plains	bluebunch
Sand	crested
W W spar	intermediate
Buffalograss	pubescent
Green sprangletop	Siberian
Kleingrass	slender
Lovegrasses --	steambank
Atherstone	tall
Sand	thickspike
Weeping	western
Wilman	Wildrye grass --
Orchardgrass	Russian

Maximize potential for grass establishment by consulting with the Natural Resource and Conservation Service of other government agencies or local experts concerning planting techniques and other cultural practices.

Performance from ESCORT® XP may not always be satisfactory due to the inability of newly planted grass stands to sufficiently compete with weeds, and the severity of weed pressure in new grass stands.

An additional herbicide application or mowing may be needed.

Use Rates and Application Timing for Grass Establishment Preplant (prior to planting) or Preemergence (after planting but before grass emergence)

Do not use more than 1/10 ounce per acre of ESCORT® XP for grass establishment.

Apply ESCORT® XP at 1/10 ounce per acre on all labeled grasses except orchardgrass and Russian wildrye grass. Do not apply ESCORT® XP preplant or preemergence to orchardgrass and Russian wildrye grass as severe crop injury may result.

Early postemergence to new plantings

Apply ESCORT® XP at 1/10 ounce per acre, plus a non-ionic surfactant at the rate of 2 to 4 pints per 100 gallons of spray solution on all labeled grasses anytime after grass emergence.

Do not use a spray adjuvant other than non-ionic surfactant. Because grass species differ in time of emergence, apply only after the majority of grasses are in the 3 to 4 leaf stage.

Postemergence to stands with 1 – 5 leaf grasses planted the previous season

Apply ESCORT® XP at 1/10 ounce per acre plus a non-ionic surfactant at the rate of 2 to 4 pints per 100 gallons of spray solution, on all labeled grasses when the majority of the grasses have one or more leaves.

Do not use a spray adjuvant other than non-ionic surfactant.

APPLICATION INFORMATION FOR ESTABLISHED GRASSES

Use Rates for Established Grasses

Apply up to 1 ounce ESCORT® XP per acre as a broadcast application to established grasses. For spot applications, use 1 ounce per 100 gallons of water. Do not apply more than 1 2/3 ounces of ESCORT® XP per acre per year.

Refer to the Weeds Controlled section of this label for a listing of the weeds controlled by ESCORT® XP and the appropriate use rate to obtain control.

Application Timing – Established Grasses

ESCORT® XP may be applied to established native grasses such as bluestems and grama, and on other established grasses such as bermudagrass, bluegrass, orchardgrass, bromegrass, fescue and timothy that were planted the previous growing season (or earlier) and are fully tillered, unless otherwise directed on this label. Specific application timing information on several of these grass species follows:

Grass	Minimum time from Grass establishment ESCORT® XP application
Bermudagrass	2 months
Bluegrass, bromegrass, Orchardgrass	6 months
Timothy	12 months
Fescue	24 months

Fescue Precautions:

Note that ESCORT® XP may temporarily stunt tall fescue, cause it to turn yellow, or cause seedhead suppression. To minimize these symptoms, take the following precautions:

- Do not use more than 4/10 ounce per acre of ESCORT® XP
- Tank mix ESCORT® XP with 2,4-D
- Use the lowest recommended rate for target weeds
- Use a non-ionic surfactant at 1/2 to 1 pint per 100 gallons of spray solution
- Make application later in the spring after the new growth is 5 to 6 inches tall, or in the fall
- Do not use surfactant when liquid nitrogen is used as a carrier
- Do not use a spray adjuvant other than non-ionic surfactant

The first cutting yields may be reduced due to seedhead suppression resulting from treatment with ESCORT® XP.

Timothy Precautions:

Timothy should be at least 6 inches tall at application and be actively growing. Applications of ESCORT® XP to timothy under any other conditions may cause crop yellowing and/or stunting. To minimize these symptoms, take the following precautions:

- Do not use more than 4/10 ounce per acre ESCORT® XP
- Tank mix ESCORT® XP with 2, 4-D
- Use the lowest recommended rate for target weeds
- Use a non-ionic surfactant at 1/2 pint per 100 gallons of spray solution (1/16%)
- Make applications in the late summer or fall
- Do not use surfactant when liquid nitrogen is used as a carrier
- Do not use spray adjuvant other than non-ionic surfactant

Application of ESCORT® XP to Pensacola bahiagrass, ryegrass (Italian or perennial) and Garrison's creeping foxtail may cause severe injury to and/or loss of forage.

Other Grasses:
Varieties and species of forage grasses differ in their tolerance to herbicides. When using DuPont™ ESCORT® XP on a particular grass for the first time, limit use to a small area. In no injury occurs throughout the season, larger acreage may be treated the following season.
Broadleaf forage species, such as alfalfa and clover, are highly sensitive to ESCORT® XP and will be severely stunted or injured by ESCORT® XP.

CROP ROTATION

Before using ESCORT® XP, carefully consider your crop rotation plans and options.

Minimum Rotational Intervals

Minimum rotation intervals* are determined by the rate of breakdown of ESCORT® XP applied. ESCORT® XP breakdown in the soil is affected by soil pH, presence of soil microorganisms, soil temperature, and soil moisture. Low soil pH, high soil temperature, and high soil moisture increase ESCORT® XP breakdown in soil, while high soil pH, low soil temperature, and low soil moisture slow ESCORT® XP breakdown.
Of these 3 factors, only soil pH remains relatively constant. Soil temperature, and to a greater extent, soil moisture, can vary significantly from year to year and from area to area. For this reason, soil temperatures and soil moisture should be monitored regularly when considering crop rotations.
* The minimum rotation interval represents the period of time from the last application to the anticipated date of the next planting.

Soil pH Limitations
ESCORT® XP should not be used on soils having a pH above 7.9, as extended soil residual activity could extend crop rotation intervals beyond normal. Under certain conditions, ESCORT® XP could remain in the soil for 34 months or more, injuring wheat and barley. In addition, other crops planted in high-pH soils can be extremely sensitive to low concentrations of ESCORT® XP.

Checking Soil pH
Before using ESCORT® XP, determine the soil pH of the areas of intended use. To obtain a representative pH value for the test area, take several 0" to 4" samples from different areas of the field and analyze them separately. Consult local extension publications for additional information on recommended soil sampling procedures.

BIOASSAY
A field bioassay must be completed before rotating to any crop or grass species/variety not listed in the Rotation Intervals Table, or if the soil pH is not in the specified range, or if the use rate applied is not specified in the table. To conduct a field bioassay, grow test strips of the crop(s) or grass(es) you plan to grow the following year in fields previously treated with ESCORT® XP. Crop or grass response to the bioassay will indicate whether or not to rotate to the crop(s) or grass(es) grown in the test strips.
If a field bioassay is planned, check with your local Agricultural dealer or DuPont representative for information detailing the field bioassay procedure.

Rotation Intervals for Overseeding and Renovation

Location	Crop or Grass Species	Maximum ESCORT® XP Rate (oz per A)	Minimum Rotation Interval (months)
AL, AR, FL, GA, KY, LA, MS, NC, OK, SC, TN, TX, VA, WV	Alfalfa, red clover, white clover, sweet clover, bermudagrass, bluegrass, ryegrass, tall fescue	1/10 to 3/10	4
	Wheat (except durum)	1/10 to 3/10	1
	Durum, barley, oat	1/10 to 3/10	10
ALL STATES NOT INCLUDED ABOVE	Red clover, white clover, and sweet clover	1/10 to 2/10	12
	Bermudagrass, bluegrass, ryegrass	1/10 to 2/10	6
	Tall Fescue	1/10 to 2/10	18
	Wheat (except durum)	1/10 to 2/10	1
	Durum, barley, oat	1/10 to 2/10	10
ALL AREAS WITH SOIL PH OF 7.5 OR LESS	Russian wildrye	1/10 to 1/2	1
	Green needlegrass, switchgrass, sheep fescue	1/10 to 1	1
	Meadow brome, smooth brome, alta fescue, red fescue, meadow foxtail, orchardgrass, Russian wildrye, timothy	1/10 to 1	2
ALL AREAS WITH SOIL PH OF 7.9 OR LESS	Alkali sacoton, mountain brome, blue grama thickspike wheatgrass	1/10 to 1	1
	Sideoats grama, switchgrass	1/10 to 1/2	2
	Western wheatgrass	1/10 to 1	2
	Sideoats grama, switchgrass, big bluestem	1/10 to 1	3

When used as directed, there is no grazing or haying restriction for use rates of 1 2/3 ounce per acre or less. At use rates greater than 1 2/3 ounce per acre and up to 3 1/3 ounce per acre, forage grasses may be cut for hay, fodder or green forage and fed to livestock, including lactating animals, 3 days after treatment.

IMPORTANT PRECAUTIONS

- Grass species or varieties may differ in their response to various herbicides. If no information is available, limit the initial use of DuPont™ ESCORT® XP to a small area.
- Components in a grass seed mixture will vary in tolerance to ESCORT® XP so the final stand may not reflect the seed ratio.
- Under certain conditions such as heavy rainfall, high pH, prolonged cold weather, or wide fluctuations in day/night temperatures prior to or soon after ESCORT® XP application, temporary discoloration and/or grass injury may occur. ESCORT® XP should not be applied to grass that is stressed by severe weather conditions, drought, low fertility, water-saturated soils, disease, or insect damage as grass injury may result. Severe winter stress, drought, disease, or insect damage before or following application also may result in grass injury.
- Applications of ESCORT® XP to lands undersown with legumes may cause injury to the legumes. Legumes in a seeding mixture may be severely injured or killed following an application of ESCORT® XP.
- The control of weeds in wheel track areas may be reduced if ground applications are made when dry, dusty field conditions exist. The addition of 2,4-D or MCPA should improve weed control under these conditions.

WEEDS CONTROLLED

1/3 to 1/2 ounce per acre

Annual sowthistle
Aster
Bahiagrass
Beebalm
Bittercress
Bitter sneezeweed
Blackeyed-susan
Blue mustard
Bur buttercup
Chicory
Clover
Cocklebur
Common chickweed
Common groundsel
Common purslane
Common yarrow
Conical catchfly
Corn cockle
Cow cockle
Crown vetch
Dandelion
Dogfennel
False chamomile
Fiddleneck tarweed
Field pennycress
Flixweed
Goldenrod
Lambsquarters
Marestail/horseweed****
Maximillion sunflower
Miners lettuce
Pennsylvania smartweed
Plains coreopsis
Plantain
Redroot pigweed
Redstem filaree
Rough fleabane
Shepherd's purse
Silky crazyweed (locoweed)
Smallseed falseflax
Smooth pigweed
Sweet clover
Tansymustard
Treacle mustard
Tumble mustard
Wild carrot
Wild garlic
Wild lettuce
Wild mustard
Wooly croton
Wood sorrel
Yankeweed

1/2 to 1 ounce per acre

Blackberry
Black henbane
Broom snakeweed*
Buckhorn plantain
Bull thistle
Common crupina
Common sunflower
Curly dock
Dewberry
Dyer's woad
Garlic mustard
Gorse
Halogeton
Henbit
Honeysuckle
Multiflora rose and other wild roses
Musk thistle***
Oxeye daisy
Plumeless thistle
Prostrate knotweed
Rosering gaillardia
Seaside arrowgrass
Sericea lespedeza
Tansy ragwort
Teasel
Wild caraway

1 to 2 ounces per acre

Common mullein
Common tansy
Field bindweed**
Greasewood
Gumweed
Houndstongue
Lupine
Old world climbing fern (Lygodium)
Perennial pepperweed
Poison hemlock
Purple loosestrife
Purple scabious
Scotch thistle
Scouringrush
Salsify
Snowberry
St. Johnswort
Sulphur cinquefoil
Western salsify
Whitetop (hoary cress)
Wild Iris

1 1/2 to 2 ounces per acre

Canada thistle**
Dalmation toadflax**
Duncecap larkspur
Russian knapweed**
Tall larkspur
Wild parsnip
Yellow toadflax**

3 to 4 ounces per acre

Kudzu

* Apply fall through spring.
** Suppression, which is a visual reduction in weed competition (reduced population or vigor) as compared to untreated areas. Apply as a full coverage spray for best performance.
*** Certain biotypes of musk thistle are more sensitive to ESCORT® XP and may be controlled with rates of 1/4 to 1/2 ounce per acre. Treatments of ESCORT® XP may be applied from rosette through bloom stages of development.
****Certain biotypes of marestail/horsetail are less sensitive to ESCORT® XP and may be controlled by tank mixes with herbicides with a different mode of action.

Problem Weed Control

For broader spectrum control and for use on certain biotypes of broadleaf weeds which may be resistant to ESCORT® XP and herbicides with the same mode of action, the following tank mixes are recommended.

Dicamba + 2,4-D

Weed	Rate of ESCORT® XP	Rate of dicamba (fluid ounces/acre)	Rate of 2,4-D (fluid ounces/acre)
Kochia control	1/2	8	16
Spotted knapweed control	1/2	8	16
Rush skeletonweed suppression	1	8	16

TURF, INDUSTRIAL (UNIMPROVED ONLY)

Application Information

ESCORT® XP is recommended for selective weed control in unimproved industrial turf where certain grasses are well established and desired as ground cover. ESCORT® XP is also recommended for the control of certain noxious and troublesome weeds in turf.

In addition to conventional spray equipment, ESCORT® XP may also be applied with invert emulsion equipment. When using an invert emulsion, mix the prescribed rate of ESCORT® XP in the water phase.

Consult the "Weeds Controlled" table to determine which weeds will be controlled by the following recommendations:

Turf Type	Rate of DuPont™ ESCORT® XP (ounces/acre)
Fescue and Bluegrass	1/4 to 1/2
Crested Wheatgrass and Smooth Brome	1/4 to 1
Bermudagrass	1/4 to 2

Application Timing

Applications may be made at anytime of the year, except when the soil is frozen.

When a spring application is made on fescue or bluegrass, a second application may be made during the summer after full seedhead maturation.

Growth Suppression and Seedhead Inhibition (Chemical Mowing)

Application Information

ESCORT® XP is recommended for growth suppression and seedhead inhibition in well established fescue and bluegrass turf at the use rate of 1/4 to 1/2 ounce per acre.

Tank Mix Combination

ESCORT® XP may be tank mixed with "Embark" for improved performance in the regulation of growth and seedhead suppression. Tank mix 1/4 to 1/2 ounce of ESCORT® XP with 1/8 to 1/4 pint of "Embark".

Application Timing

Application may be made after at least 2 to 3 inches of new growth has emerged until the appearance of the seed stalk.

Fescue Precautions:

ESCORT® XP may temporarily stunt tall fescue, cause it to turn yellow, or cause seedhead suppression. To minimize these symptoms, take the following precautions:

- Do not use more than 4/10 ounce per acre of ESCORT® XP.
- Tank mix ESCORT® XP with 2,4-D.
- Use the lowest recommended rate for target weeds.
- Use a non-ionic surfactant at 1/2 to 1 pint per 100 gallons of spray solution.
- Make application later in the spring after the new growth is 5 to 6 inches tall, or in the fall.
- Do not use a surfactant when liquid nitrogen is used as a carrier.
- Do not use a spray adjuvant other than non-ionic surfactant.
- The yields from the first cutting may be reduced due to seedhead suppression resulting from treatment with ESCORT® XP.

IMPORTANT PRECAUTIONS —INDUSTRIAL TURF ONLY

- An application of ESCORT® XP may cause temporary discoloration (chlorosis) of the grasses. Use the lower recommended rates for minimum discoloration.
- With fescue and bluegrass, sequential applications made during the same or consecutive growth periods (i.e. spring and fall) may result in excessive injury to turf.
- Excessive injury may result when ESCORT® XP is applied to turf that is under stress from drought, insects, disease, cold temperatures (winter injury) or poor fertility.
- ESCORT® XP is not recommended for use on bahiagrass.

BRUSH CONTROL

Application Information

ESCORT® XP is recommended for the control of undesirable brush growing in non-crop areas including grazed areas on these sites. Applications may be made by air, high volume ground application, low volume ground application and ultra-low volume ground application.

Except as noted for multiflora rose, ESCORT® XP should be applied as a spray to the foliage.

The application volume required will vary with the height and density of the brush and the application equipment used. Generally, aerial applications will require 15 to 25 gallons of water per acre; high volume ground application will require 100 to 400 gallons of water per acre; low volume ground application will require 20 to 50 gallons of water per acre; and ultra-low volume ground application will require 10 to 20 gallons of water per acre.

Regardless of the application volume and equipment used, thorough coverage of the foliage, particularly the terminal growing points, is necessary to optimize results.

BRUSH SPECIES CONTROLLED

Species	High Volume Rate (ounces/100 gallon)	Broadcast Rate (ounces/acre)
Ash	1—2	1—3
Aspen	1—2	1—3
Black locust	1—2	1—3
Blackberry	1—2	1—3
Camelthorn	1—2	1—3
Cherry	1—2	1—3
Cottonwood	1—2	2—3
Eastern red cedar	1—2	2—3
Elder	1—2	2—3
Elm	1—2	1—3
Firs	3	1—2
Hawthorn	1—2	1—3
Honeysuckle	1—2	1/2—1
Mulberry	1—2	2—3
Multiflora rose	1—2	1—3
Muscadine (wild grape)	1—2	2—3
Oaks	1—2	1—3
Ocean spray (*Holodiscus*)	1—2	2—3
Osage orange	1—2	2—3
Red maple	1—2	2—3
Salmonberry	1/2—1	1—3
Snowberry	1/2—1	1—3
Spruce (black and white)	3	2—3
Thimbleberry	1/2—1	1—3
Tree of heaven (*Ailanthus*)	1—2	1—2
Wild roses	1/2—1	1—3
Willow	1/2—1	1—3
Yellow poplar	1/2—1	1—3

For low volume and ultra-low volume ground applications, mix 4 to 8 ounces of ESCORT® XP per 100 gallons of spray solution.

Application Timing
Make a foliar application of the recommended rate of DuPont™ ESCORT® XP during the period from full leaf expansion in the spring until the development of full fall coloration on deciduous species to be controlled. Coniferous species may be treated at anytime during the growing season.

Spot Treatment
ESCORT® XP is recommended for the control of many species of weeds including noxious/invasive weeds in certain established grasses growing on non-crop areas. Refer to the "Weeds Controlled" section for a listing of susceptible weed species and the application rate per acre per the target weed.
Or, mix one gram of ESCORT® XP per one gallon of water along with a surfactant. Spray to the point of wetting the entire surface of the target weeds, approximately 40 gallons of solution per acre.

Tank Mix Combinations—
ESCORT® XP may be tank mixed with any product labeled for non-crop brush control at the application rates specified on the companion product's label for the pests specified on the product's companion label. Read and follow the label instructions of both products when tank mixing. Follow the most restrictive limitations of any of the product labels being tank mixed.

Low Rate Applications

Imazapyr (2 pound active per gallon)
Combine 1 to 2 ounces of ESCORT® XP with 1 to 4 pints of imazapyr herbicide per acre and apply as a broadcast spray. Aerial applications should use a minimum of 15 gallons per acre spray volume. In addition to species listed above controlled by ESCORT® XP, this combination controls black gum, hophornbeam, sassafras, sweetgum, Vaccinium species, dogwood, myrtle dahoon, hickories, and persimmon.

Picloram (2 pound active per gallon) + Imazapyr (2 pound active per gallon)
Combine 1 to 1 1/2 ounce of ESCORT® XP with 2 to 8 fluid ounces of imazapyr and 1 to 2 pints of picloram per 100 gallons of water. Apply as a high volume spray. This tank mix controls cherry, elms, box elder, maples, hackberry, redbud, ash, oaks (including shingle oak), black locust and sassafras.
*Picloram is a restricted use pesticide.

Spotgun Basal Soil Treatment
For control of multiflora rose, prepare a spray suspension of ESCORT® XP by mixing 1 ounce per gallon of water. Mix vigorously until the ESCORT® XP is dispersed and agitate periodically while applying the spray suspension.
Apply the spray preparation with an exact delivery handgun applicator. Apply at the rate of 4 milliliters for each 2 feet of rose canopy diameter. Direct the treatment to the soil within 2 feet of the stem union. When treating large plants and more than one delivery is required, make applications on opposite sides of the plant.
Applications should be made from early spring to summer.

IMPORTANT PRECAUTIONS —NON-CROP BRUSH ONLY

- When using tank mixtures of ESCORT® XP with companion herbicides, read and follow all use instructions, application rates, warnings and precautions appearing on the labels. Follow the most restrictive label instructions for each of the herbicides used.

SPRAY EQUIPMENT

Low rates of ESCORT® XP can kill or severely injure most crops. Following an ESCORT® XP application, the use of spray equipment to apply other pesticides to crops on which ESCORT® XP is not registered may result in their damage. The most effective way to reduce this crop damage potential is to use dedicated mixing and application equipment.
The selected sprayer should be equipped with an agitation system to keep ESCORT® XP suspended in the spray tank. Use a sufficient volume of water to thoroughly cover the foliage of undesirable weeds, generally 10 to 40 gallons per acre. Select a spray volume and delivery system that will deliver a uniform spray pattern. Be sure the sprayer is calibrated before use. Avoid overlapping and shut off spray booms while starting, turning, slowing or stopping to avoid injury to desired plants.
Refer to the brush control section of this label for information unique to that particular use.

MIXING INSTRUCTIONS

1. Fill the tank 1/4 to 1/3 full of water.
2. While agitating, add the required amount of ESCORT® XP.
3. Continue agitation until the ESCORT® XP is fully dispersed, at least 5 minutes.
4. Once the ESCORT® XP is fully dispersed, maintain agitation and continue filling tank with water. ESCORT® XP should be thoroughly mixed with water before adding any other material.
5. As the tank is filling, add tank mix partners (if desired) then add the necessary volume of nonionic surfactant. Always add surfactant last.
6. If the mixture is not continuously agitated, settling will occur. If settling occurs, thoroughly re-agitate before using.
7. ESCORT® XP spray preparations are stable if they are pH neutral or alkaline and stored at or below 100° F.
8. If ESCORT® XP and a tank mix partner are to be applied in multiple loads, pre-slurry the ESCORT® XP in clean water prior to adding to the tank. This will prevent the tank mix partner from interfering with the dissolution of the ESCORT® XP.

USE PRECAUTIONS

- 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 product may be washed or moved into contact with their roots, as injury or loss of desirable trees or other plants may result

- Treatment of powdery, dry soil or light, sandy soil when there is little likelihood of rainfall soon after treatment may result in off target movement and possible damage to susceptible crops when soil particles are moved by wind or water. Injury to crops may result if treated soil is washed, blown, or moved onto land used to produce crops. Exposure to DuPont™ ESCORT® XP may injure or kill most crops. Injury may be more severe when the crops are irrigated. Do not apply ESCORT® XP when these conditions are identified and powdery, dry soil or light or sandy soils are known to be prevalent in the area being treated.
- Applications made where runoff water flows onto agricultural land may injure crops. Applications made during periods of intense rainfall, to soils saturated with water, to surfaces paved with materials such as asphalt or concrete, or to soils through which rainfall will not readily penetrate may result in runoff and movement of ESCORT® XP. Do not treat frozen soil. Treated soil should be left undisturbed to reduce the potential for ESCORT® XP movement by soil erosion due to wind or water.
- Do not use on lawns, walks, driveways, tennis courts or similar areas.
- Do not apply through any type of irrigation system.
- When used as directed, there are no grazing or haying restrictions for use rates of 1 2/3 ounce per acre and less. At use rates of 1 2/3 to 3 1/3 ounce per acre, forage grasses may be cut for hay, fodder or green forage and fed to livestock, including lactating animals, 3 days after treatment.
- Do not use this product in the following counties of Colorado: Saguache, Rio Grande, Alamosa, Costilla and Conejos.
- Do not use this product in California.

SPRAYER CLEANUP

Spray equipment must be cleaned before ESCORT® XP is sprayed. Follow the cleanup procedures specified on the labels of previously applied products. If no directions are provided, follow the six steps outlined below.

At the End of the Day

When multiple loads of ESCORT® XP herbicide are applied, it is recommended that at the end of each day of spraying, the interior of the tank be rinsed with fresh water and then partially filled, and the boom and hoses flushed. This will prevent the buildup of dried pesticide deposits that can accumulate in the application equipment.

1. Drain tank; thoroughly rinse spray tanks, boom, and hoses with clean water. Loosen and physically remove any visible deposits.
2. Fill the tank with clean water and 1 gal of household ammonia* (contains 3% active) for every 100 gal of water. Flush the hoses, boom, and nozzles with the cleaning solution. Then add more water to completely fill the tank. Circulate the cleaning solution through the tank and hoses for at least 15 min. Flush the hoses, boom, and nozzles again with the cleaning solution, and then drain the tank.
3. Remove the nozzles and screens and clean separately in a bucket containing cleaning agent and water.
4. Repeat step 2.
5. Rinse the tank, boom, and hoses with clean water.
6. If only ammonia is used as a cleaner, the rinsate solution may be applied back to the crop(s) recommended on this label. Do not exceed the maximum labeled use rate. If other cleaners are used, consult the cleaner label for rinsate disposal instructions. If no instructions are given, dispose of the rinsate on site or at an approved waste disposal facility.

* Equivalent amounts of an alternate-strength ammonia solution or a DuPont-approved cleaner can be used in the cleanout procedure. Carefully read and follow the individual cleaner instructions. Consult your agricultural dealer, applicator, or DuPont representative for a listing of approved cleaners.

Notes:

1. **Attention**: Do not use chlorine bleach with ammonia, as dangerous gases will form. Do not clean equipment in an enclosed area.
2. Steam-cleaning aerial spray tanks is recommended prior to performing the above cleanout procedure to facilitate the removal of any caked deposits.
3. When ESCORT® XP is tank mixed with other pesticides, all required cleanout procedures should be examined and the most rigorous procedure should be followed.
4. In addition to this cleanout procedure, all precleanout guidelines on subsequently applied products should be followed as per the individual labels.

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 these factors when making application decisions.

AVOIDING SPRAY DRIFT IS THE RESPONSIBILITY OF THE APPLICATOR.

IMPORTANCE OF DROPLET SIZE

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See **Wind, Temperature and Humidity**, and **Temperature Inversions** sections of this label.

Controlling Droplet Size - General Techniques

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

- **Pressure** - Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles.

Controlling Droplet Size - Aircraft

- **Number of Nozzles** - Use the minimum number of nozzles with the highest flow rate that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is emitted backwards, parallel to the 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** - The boom length should not exceed 3/4 of the wing or rotor length - longer booms increase drift potential.
- **Application Height** - Application more than 10 ft above the canopy increases the potential for spray drift.

BOOM HEIGHT

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

WIND

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given wind speed. AVOID GUSTY OR WINDLESS CONDITIONS. Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

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

TEMPERATURE INVERSIONS

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

SHIELDED SPRAYERS

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

STORAGE AND DISPOSAL

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

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

Container Disposal: **For Plastic Containers**: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke. **For Fiber Sacks**: Completely empty fiber sack by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing or application equipment. Then dispose of sack in a sanitary landfill or by incineration if allowed by State and local authorities. **For Fiber Drums With Liners**: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner. **For Bags Containing Water Soluble Packets**: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by State and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above. **For Metal Containers (non aerosol)**: Triple rinse (or equivalent) the container. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. **For Paper and Plastic Bags**: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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

DuPont does not agree to be an insurer of these risks. TO THE FULLEST EXTENT PERMITTED BY LAW, WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.

DuPont 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.

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DuPont 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 DuPont or a DuPont 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.

For product information call: 1-888-6-DUPONT
Internet address: http://cropprotection.dupont.com/

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Specimen Label

Dow AgroSciences

Garlon® 4

Specialty Herbicide

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For the control of woody plants and annual and perennial broadleaf weeds in non-crop industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, forests and in the establishment and maintenance of wildlife openings. Use on these sites may include application to grazed areas.

Active Ingredient:	
triclopyr: 3,5,6-trichloro-2- pyridinyloxyacetic acid, butoxyethyl ester	61.6%
Other Ingredients	38.4%
Total	100.0%

Contains petroleum distillates
Acid equivalent: triclopyr - 44.3% - 4 lb/gal

EPA Reg. No. 62719-40

Keep Out of Reach of Children

CAUTION PRECAUCION

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

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Moderate Eye Irritation • Harmful If Swallowed • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Reactions In Some Individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Personal Protective Equipment (PPE)

Applicators and other handlers who handle this pesticide 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 are given, 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 WPS (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 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: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give **any** liquid to the person. Do not give anything by mouth to an unconscious person.

Note to Physician: This product may pose an aspiration pneumonia hazard. Contains petroleum distillates.

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, 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.

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.

Physical or Chemical Hazards

Combustible. Do not use or store the product near heat or open flame.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies elsewhere on this label If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

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

The requirements in this box apply to forestry uses.

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
- Shoes plus socks
- Protective eyewear

Non-Agricultural Use Requirements

The requirements in this box apply to all use sites on this label except for forestry uses.

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.

Storage and Disposal

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

Storage and Disposal (Cont.)

Nonrefillable containers 5 gallons or less:
Container Reuse: 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 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 Reuse: 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.

Nonrefillable containers 5 gallons or larger:
Container Reuse: 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.

General Information

Use Garlon® 4 specialty herbicide for the control of woody plants and annual and perennial broadleaf weeds in non-crop industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, forests and in the establishment and maintenance of wildlife openings. Use on these sites may include application to grazed areas.

Garlon 4 is an oil soluble, emulsifiable liquid product containing the herbicide triclopyr. Garlon 4 may be applied to woody or herbaceous broadleaf plants as a foliar spray or as a basal bark or cut stump application to woody plants. As a foliar spray, Garlon 4 controls only herbaceous plants that have emerged from the soil or woody plants that are in full leaf at the time of application. Small amounts of Garlon 4 can kill or injure many broadleaf plants. To prevent damage to crops and other desirable plants, follow all directions and precautions.

General Use Precautions and Restrictions

In Arizona: The state of Arizona has not approved Garlon 4 for use on plants grown for commercial production; specifically forests grown for commercial timber production, or on designated grazing areas.

When applying this product in tank mix combination, follow all applicable use directions, precautions, and limitations on each manufacturer's label.

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

Apply no more than 1/2 gallon of Garlon 4 (2 lb ae of triclopyr) per acre per growing season on rights-of-way or any area where grazing or harvesting is allowed.

On forestry sites, Garlon 4 may be used at rates up to 6 quarts (6 lb ae of triclopyr) per acre per year.

Garlon 4 may be used at rates up to 8 quarts (8 lb ae of triclopyr) per acre per year on non-crop industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides and railroads, fence rows, non-irrigation ditch banks. 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.

Do not apply Garlon 4 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 Garlon 4 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 currently being 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 unless a drift control additive, high viscosity inverting system, or equivalent is used to control spray drift.

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 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.

Grazing and Haying Restrictions
Except for lactating dairy animals, there are no grazing restrictions following application of this product.

- **Grazing Lactating Dairy Animals:** Do not allow lactating dairy animals to graze treated areas until the next growing season following application of this product.
- Do not harvest hay for 14 days after application.
- 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.

Slaughter Restrictions: 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.

Aerial Application: Garlon 4 may be aerially applied by fixed wing aircraft or helicopter. 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. Spray only when the wind velocity is low (follow state regulations). Avoid application during air inversions. If a spray thickening agent is used, follow all use recommendations 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.

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:

1. The distance of the outer most operating nozzles on the boom must not exceed 3/4 the length of the rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

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

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 produced 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 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, Garlon 4 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. 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. 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. An agriculturally labeled thickening agent may be used to reduce drift.

Mixing Directions

Garlon 4 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 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 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 or Garlon 4 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.

Ground Application: Add oil to the spray mix at a rate of 5 to 10% of the total mix, up to a maximum of 1 gallon of oil per acre, using agricultural spray emulsifiers according to mixing instructions below.

Aerial Application: Use oil and water in the spray mixture in a 1:5 ratio (1 part oil to 5 parts water), up to a maximum of 1 gallon of oil per acre according to mixing instructions below.

Oil Mixture Sprays for Basal Treatment
Prepare oil-based spray mixtures using either diesel fuel, No. 1 or No. 2 fuel oil, kerosene or a commercially available basal oil. Substitute other oils or diluents only as recommended by the oil or diluent's manufacturer. When preparing an oil mixture, read and follow the use directions and precautions on the manufacturer's product label. Add Garlon 4 to the required amount of oil in the spray tank or mixing tank and mix thoroughly. If the mixture stands over 4 hours, reagitation is required.

Oil Mixtures of Garlon 4 and Tordon K: Tordon K and Garlon 4 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. (See product bulletin for mixing instructions.) Tordon K is not registered for use in the states of California and Florida.

Water Dilutions
For water dilutions, an agricultural surfactant at the manufacturer's recommended rate may be added to the spray mixture to provide improved wetting of foliage. To help minimize spray drift, a drift control and deposition aid cleared for application to growing crops is recommended.

Tank Mixing
Garlon 4 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) tank mixing is not prohibited by the label of the tank mix product. When tank mixing Garlon 4 with other materials, a compatibility test (jar test) using relative proportions of the tank mix ingredients should be conducted prior to mixing ingredients in the spray tank. Use a clear glass quart jar with lid and mix the tank mix ingredients in the required order and their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately 1/2 hour. If the mixture balls-up, forms flakes, sludges, jels, oily films or layers, or other precipitates, it is not compatible and the tank mix combination should not be used.

Mixing Order for Tank Mixes: Add one-half of the needed water to the mixing tank and start agitation. Add different materials in the order indicated below, allowing time for complete dispersion and mixing after addition of each product.

1. Water soluble herbicide (if used)
2. Premix of oil, emulsifier, Garlon 4 and other oil-soluble herbicide (if used); see below

Add the remaining water. During the final filling of the tank, add a drift control and deposition aid cleared for application to growing crops (if used), plus an agricultural surfactant (if a water dilution rather than an oil-water emulsion spray is used). Maintain continuous agitation of the spray mixture during mixing, final filling and throughout application to ensure spray uniformity.

Premixing: Prepare a premix of oil, emulsifier (if oil-water emulsion), and Garlon 4 plus other oil-soluble herbicide (if used), e.g., 2,4-D ester. **Note:** Do not allow water or mixtures containing water to get into the premix or Garlon 4 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 or Garlon 4 is put into the mixing tank before the addition of water.

Tank Mixing Precautions:

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not exceed recommended application rates. If products containing the same active ingredient are tank 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.

Mixing with Liquid Fertilizer for Broadleaf Weed Control
Garlon 4 may be tank mixed with liquid nitrogen fertilizer and foliarly applied for weed control and fertilization of grass pastures. Use Garlon 4 in accordance with recommendations for grass pastures as given on this label. Apply at rates recommended by supplier or Extension Service Specialist. **Note:** Garlon 4 is not recommended for use with liquid fertilizer on woody plants (brush). Foliage burn caused by liquid fertilizer may reduce herbicide effectiveness on woody plants. Test for mixing compatibility using desired procedure and spray mix proportions in clear glass jar before mixing in spray tank. A compatibility aid such as Unite or Compex may be needed in some situations. **Compatibility is best with straight liquid nitrogen fertilizer solutions. Mixing with N-P-K solutions or suspensions may not be satisfactory even with the addition of compatibility aid.** Premixing Garlon 4 with 1 to 4 parts water may help in difficult situations.

Fill in the spray tank about half full with the liquid fertilizer, then add the herbicide with agitation and complete filling the tank with fertilizer. Apply immediately and continue agitation in the spray tank during application. **Do not store liquid fertilizer spray mixtures**. Application during very cold weather (near freezing) is not advisable. The likelihood of mixing or compatibility problems with liquid fertilizer increases under cold conditions.

Note: Do not use spray equipment for other applications to land planted, or to be planted, to susceptible crops or desirable plants **unless** it has been determined that all phytotoxic herbicide residue has been removed by thoroughly cleaning the equipment.

Plants Controlled by Garlon 4

Woody Plant Species

alder
arrowwood
ash
aspen
bear clover (bearmat)
beech
birch
blackberry
blackbrush
blackgum
boxelder[1]
Brazilian pepper
buckthorn
cascara
ceanothus
cherry[3]
chinquapin
choke cherry
cottonwood
crataegus (hawthorn)
dogwood
Douglas-fir
elderberry
elm (except winged elm)
gallberry
gorse
granjeno
guajillo
guava[3]
hazel
hickory
hornbeam
huisache (suppression)
kudzu[2]
locust
madrone
maple (except bigleaf, vine[3])
milkweed vine[3]
mulberry
oaks
osage orange
pepper vine[3]
persimmon, eastern
pine
poison ivy
poison oak
poplar
salmonberry
saltbush
(*Braccharis* spp.)[3]
salt cedar[1]
sassafras
scotch broom
sumac
sweetbay magnolia
sweetgum
sycamore
tanoak
thimbleberry
tree-of-heaven
(*Ailanthus*)[1]
trumpet creeper[3]
tulip poplar
twisted acacia
Virginia creeper[3]
wax myrtle (top growth)
wild rose
willow
willow primrose
winged elm

[1]For best control, use either a basal bark or cut stump treatment.
[2]For complete control, re-treatment may be necessary.
[3]Basal or dormant stem applications only.

Annual, Biennial and Perennial Broadleaf Weeds

Note: Numbers in parentheses refer to footnotes below table.

black medic
bull thistle
burdock
Canada thistle
chicory
cinquefoil
clover
creeping beggarweed
curly dock
dandelion (top growth)
dogfennel
field bindweed
goldenrod
ground ivy
lambsquarters
lespedeza
matchweed
mustard
Oxalis
plantain
purple loosestrife
ragweed
sericea lespedeza (1)
smartweed
sulfur cinquefoil (2)
sweet clover
tropical soda apple (3)
vetch
wild carrot
(Queen Anne's lace)
wild lettuce
wild violet
yarrow

1. **Sericea lespedeza:** Apply 1 to 2 pints of Garlon 4 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 per acre. For best results, apply to plants in the rosette stage.
3. **Tropical soda apple:** Apply 2 pints of Garlon 4 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 in water (1 to 1 1/2 gallons of Garlon 4 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 as a broadcast treatment.
- Use spot treatment to control any remaining plants or thin stands of plants that germinate following a broadcast treatment.

Application Methods

Use Garlon 4 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. 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 alone or in combination with Tordon® 101 Mixture specialty herbicide or Tordon K herbicide. Tordon 101 Mixture and Tordon K are restricted use pesticides. Tordon 101 Mixture and Tordon K are not registered for use in the states of California and Florida.

When using Garlon 4 in combination with 2,4-D low volatile ester herbicide, generally the higher rates of Garlon 4 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

Use sufficient spray volume to completely and uniformly cover foliage. For ground application, apply 10 gallons or more of total spray volume per acre. Use higher spray volumes for ground applications to ensure adequate coverage with increased depth and density of foliage, particularly for treatment of woody plants.

High Volume Foliage Treatment

For control of woody plants, use Garlon 4 at the rate of 2 to 6 quarts per 100 gallons of spray mixture, or Garlon 4 at 2 to 4 quarts may be tank mixed with labeled rates of 2,4-D low volatile ester herbicide, Tordon 101 Mixture, or Tordon K and diluted to make 100 gallons of spray. Do not apply more than 2 gallons of Garlon 4 per acre. On rangeland and permanent pasture sites, make 1 application per year and apply no more than 2 quarts of Garlon 4 (2 lb ae of triclopyr) per acre. Apply at a volume of 100 to 400 gallons of total spray per acre depending upon size and density of woody plants. Tordon 101 Mixture and Tordon K 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.

Total Spray Volume (gallons/acre)	Rate of Garlon 4	
	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 qt of Garlon 4 (6 lb ae of triclopyr) per acre per year.

[2]Do not exceed the maximum use rate of 8 qt of Garlon 4 (8 lb ae of triclopyr) per acre per year for non-grazable areas, or 2 qt (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.

Table 2

Application Rates per 100 Gallons of Spray		
Garlon 4	Plus Tank Mix Product	Rate (qt)
1 - 4 qt	--	--
1 - 2 qt	Grazon® P+D specialty herbicide	4
1 - 2 pt	2,4-D low volatile ester herbicide	1 - 2
1 - 2 qt	Tordon 22K	1 - 2
2 qt	Reclaim® specialty herbicide [1,2]	2

[1] Reclaim is registered for use only in Arizona, Texas, Oklahoma and New Mexico.
[2] See directions for Mesquite Control Using High Volume Foliage Treatment below.

Mesquite Control Using High Volume Foliage Treatment: For control of mesquite infestations of low to moderate density, apply Garlon 4 and Reclaim in a tank mixture to individual plants with backpack or hand-held sprayers or a vehicle-mounted sprayer with hand-held spray wand or spray gun. For individual plant treatment, use 2 quarts of Garlon 4 in combination with 2 quarts of Reclaim per 100 gallons of total spray solution (1/2% v/v of each product). Apply in water or as an oil-water emulsion as described in Mixing Directions. If using an oil-water emulsion, add the oil at a rate of 5% of the total spray volume. Apply as a complete spray-to-wet foliar application, including all leaves. Thorough coverage is necessary for good results, but do not spray to the point of runoff. Do not apply when mesquite foliage is wet. The total amount of Garlon 4 applied should not exceed 1 1/3 pints per acre. For best results, follow information given elsewhere in this label concerning effect of environmental conditions and application timing on control. This application method works best for brush less than 8 feet tall since efficient treatment and thorough coverage of taller brush is difficult to achieve with this method. To minimize drift, select a spray nozzle and pressure that provides good coverage while forming a coarse spray. Additionally, drift may be reduced by using the minimum pressure necessary to obtain plant coverage without forming a mist and by directing sprays no higher than the top of target plants. If desired, a spray dye may be added to the spray mixture to mark the treated plants.

Low Volume Foliage Treatment

To control susceptible woody plants, mix up to 20 quarts of Garlon 4 in 10 to 100 gallons of finished spray. The spray concentration of Garlon 4 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 General 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.

Tank Mixing: As a low volume foliage spray, up to 12 quarts of Garlon 4 may be applied in tank mix combination with labeled rates of Tordon K or Tordon 101 Mixture in 10 to 100 gallons of finished spray. Tordon 101 Mixture and Tordon K are not registered for use in the states of California and Florida.

Broadcast Applications With Aerial or Ground Equipment

Environmental conditions and application timing influence brush and weed control results. For best results, apply when woody plants and weeds are actively growing. For woody species, apply after the rapid growth period of early spring when leaf tissue is fully expanded and terminal growth has slowed. Brush regrowth should be at least 4 ft high prior to treatment to insure adequate foliage for herbicide absorption. Adequate soil moisture before and after treatment as well as the presence of healthy foliage at the time of application are important factors contributing to optimal herbicidal activity.

Use sufficient spray volume to completely and uniformly cover foliage. For ground application, apply 10 gallons or more of total spray volume per acre. For aerial application, apply at least 2 gallons of total spray volume per acre. Use higher spray volumes for ground or aerial applications to ensure adequate coverage with increased depth and density of foliage, particularly for treatment of woody plants.

Mesquite: The herbicidal response of mesquite is strongly influenced by foliage condition, growth stage and environmental conditions. For best results, apply when new growth foliage has turned from light to dark green, when the soil temperature is above 75°F at a depth of 12 to 18 inches, and soil moisture is adequate for plant growth. Apply within 60 days after the 75°F minimum soil temperature at the 12- to 18-inch depth has been reached. Product performance may be adversely affected if application is made before mesquite foliage has turned from light to dark green or if foliage has been injured or removed by late frost, insects, hail or plant diseases. Do not treat if mesquite exhibits new (light green) terminal growth in response to recent heavy rainfall during the growing season. Rate of soil warm-up at the 12- to 18-inch depth may vary with soil texture and drainage. Coarse-textured (sandy) soils warm up sooner than fine-textured (clay) soils and dry soils warm up more quickly than wet soils. Mesquite regrowth should be at least 4 ft high prior to treatment to insure adequate foliage for herbicide absorption.

Mesquite Only

Apply 1/2 to 1 pint of Garlon 4 per acre in combination with 2/3 to 1 1/3 pint per acre of Reclaim. See label for Reclaim for additional treatment recommendations and information on mesquite control. Apply aerially as an oil:water emulsion in 4 gallons or more total volume per acre or with ground equipment in 10 gallons or more total volume per acre. Use a maximum of 1 gallon of oil per acre for aerial or ground application.

Mesquite and Pricklypear Cactus

If pricklypear cactus is a target species in association with mesquite, apply a tank mix of 1/2 to 1 pint of Garlon 4 with 1 to 2 pints of Tordon 22K per acre. (The 2 pint per acre rate of Tordon 22K provides a higher and more uniform plant kill of pricklypear.) Tordon 22K may also be applied in combination with Reclaim to control pricklypear while providing improved control of mesquite. See labels for Tordon 22K and Reclaim for additional information and treatment recommendations. Apply aerially as an oil:water emulsion in 4 gallons or more total volume per acre or with ground equipment in 10 or gallons or more total volume per acre. If mesquite canopy is dense, use higher spray volumes. Use a maximum of 1 gallon of oil per acre for aerial or ground application.

South Texas Mixed Brush (Mesquite, Pricklypear Cactus, Blackbrush, Twisted Acacia and Granjeno)

Use 1 to 2 pints of Garlon 4 in a tank mix with 2 pints of Tordon 22K per acre if pricklypear is a problem, or with 2/3 to 1 1/3 pints of Reclaim per acre if mesquite is the prevalent species. Garlon 4 contributes to the control of non-legume species such as granjeno and oaks. However, if woody legume species are predominate, apply 2 pints of Tordon 22K per acre in combination with 2/3 to 1 1/3 pints of Reclaim per acre for improved control. See labels for Tordon 22K and Reclaim for additional information and treatment recommendations. Apply aerially in an oil:water emulsion in 4 gallons or more total volume per acre or with ground equipment in 15 gallons or more total volume per acre. Use a maximum of 1 gallon of oil per acre for aerial or ground application. The use of an oil:water emulsion is critical and good spray coverage is essential for acceptable brush control.

Sand Shinnery Oak Suppression

In Texas, New Mexico and Oklahoma, apply Garlon 4 alone at a rate of 1/2 to 2 pints per acre for suppression of shinnery oak growing on sandy soils. Grass response following suppression may be impressive where rainfall is adequate. Grazing deferment following application together with proper grazing management is recommended to allow for the reestablishment of grass stands.

Post Oak and Blackjack Oak - Regrowth Stands

Apply in the late spring (May) to early summer (June-July) when oak leaves are fully developed (expanded). Use 2 quarts of Garlon 4 alone or in tank mix combination with 0.5 to 1 pints of 2,4-D low-volatile ester herbicide per acre. Apply in an oil:water emulsion or water surfactant dilution in sufficient total volume per acre to assure thorough coverage, usually 5 gallons or more per acre by fixed-wing aircraft or helicopter or 15 to 25 gallons per acre by ground equipment. Use a maximum of 1 gallon of oil per acre for aerial or ground application. Lower rates may be used for suppression only. Control will require at least 3 consecutive treatments. **Note:** Regrowth plants have a large root mass relative to top growth when compared to undisturbed plants. In order for top growth to intercept and translocate enough herbicide to control the roots, delay broadcast treatment until top growth is at least 4 ft tall.

High Volume Foliage Treatment: For regrowth less than 4 ft tall, apply 2 quarts of Garlon 4 per 100 gallons of water and 2 quarts of ag surfactant alone or in tank mix combination with 1 gallon of Grazon P+D or 1 quart of Tordon 22K. Apply as a high volume leaf-stem treatment to individual plants using ground equipment.

Post Oak and Blackjack Oak - Mature Stands

For control of mature stands (greater than 5 ft tall), apply 2 quarts of Garlon 4 per acre in late spring (May) to early summer (June-July) when oak leaves are fully developed (expanded). Understory species such as winged elm, buckbrush, tree huckleberry and ash occurring in some areas will not be controlled (only suppressed or defoliated) by using Garlon 4 alone. Where these understory species occur, control may be improved by tank mixing 2 quarts of Garlon 4 with 1 quart of Tordon 22K or 4 quarts of Grazon P+D per acre. For best results, apply as an oil:water emulsion in a total volume of 5 gallons per acre or more by fixed-wing aircraft or helicopter.

Other Susceptible Woody Plants

Apply 2 to 4 pints of Garlon 4 alone or in combination with 2 to 3 quarts of 3.8 lb/gal 2,4-D low volatile ester or amine formulation per acre. If difficult to control species such as ash, choke cherry, elm, maple or oaks are prevalent, and during applications made when plants are mature late in the summer or during drought conditions, use the higher rates of Garlon 4, alone or with 2,4-D. Garlon 4 may also be applied in a tank mixture with Grazon P+D or Tordon 22K for increased control of certain species. See labels for Grazon P+D and Tordon 22K for additional information and treatment recommendations. Apply aerially in 4 gallons or more total volume per acre or with ground equipment in 10 gallons or more total volume per acre. For best results on blackberry, apply during or after bloom. For management of kudzu, apply 1 quart of Garlon 4 per acre. Repeat application may be necessary to achieve desired level of control.

Susceptible Broadleaf Weeds

Use 2 pints of Garlon 4 per acre in a water spray. Apply as a broadcast spray in a total volume of 10 gallons or more per acre by ground equipment or aerially in a total volume of 2 gallons or more per acre. Apply anytime the weeds are actively growing. Garlon 4 at 1/2 to 3 pints may be tank mixed with 1 to 2 quarts of 3.8 lb/gal 2,4-D amine or low volatile ester.

Woody Plant Control

Foliage Treatment: Use 4 to 8 quarts of Garlon 4 in enough water to make 5 gallons or more per acre of total spray, or 1 1/2 to 3 quarts of Garlon 4 may be combined with labeled rates of 2,4-D low volatile ester, Tordon 101 Mixture, or Tordon K in sufficient water to make 5 gallons or more per acre of total spray. Tordon 101 Mixture and Tordon K are not registered for use in the states of California and Florida.

Broadleaf Weed Control

Use Garlon 4 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 at 0.25 to 3 quarts may be tank mixed with labeled rates of 2,4-D amine or low volatile ester, Tordon K, or Tordon 101 Mixture to improve the spectrum of activity. For thickened (high viscosity) spray mixtures, Garlon 4 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. Tordon 101 Mixture and Tordon K are not registered for use in the states of California and Florida.

Foliage Treatment (Utility and Pipeline Rights-of-Way)

Use 4 to 8 quarts of Garlon 4 alone, or 3 to 4 quarts of Garlon 4 in a tank mix combination with labeled rates of 2,4-D low volatile ester, Tordon 101 Mixture or Tordon K 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. Tordon 101 Mixture and Tordon K 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

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. These types of applications are made directly to ungrazed parts of plants and, therefore, are not restricted by the grazing maximum rate of 2 lb ae of triclopyr per acre.

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 in enough oil to make 100 gallons of spray mixture. Apply with knapsack 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 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. 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. 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. See Table 1 for relationship between mixing rate, spray volume and maximum application rate. **Note:** The addition of a soil active herbicide to a basal bark mixture with Garlon 4 may result in damage to surrounding non-target vegetation. Care should be taken to assess the areas in which these soil active herbicides are used in combination with Garlon 4 in basal bark applications. **Mixing with oil requires vigorous agitation to form an oil solution.** Once a solution is formed it will stay stable.

Garlon 4 Plus Tordon K in Oil Tank Mix: Garlon 4 and Tordon K 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 K 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 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 or knapsack sprayer 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)

To control susceptible woody plants with stems less than 6 inches in basal diameter, mix 20 to 30 gallons of Garlon 4 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. **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, 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 around each stem or clump. Use a minimum of 2 to 15 milliliters of Garlon 4 or oil mixture with Garlon 4 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 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 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.

Mix 4 to 8 quarts of Garlon 4 in 2 to 3 gallons of crop oil concentrate or other recommended oil and add this mixture in enough water to make 100 gallons of spray solution. Use continuous adequate agitation. Apply with knapsack or power spraying equipment, 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. Thoroughly wet the upper parts of the stems and use the remainder to wet the lower 12 to 15 inches above the ground to the point of runoff. For root suckering species such as sumac, sassafras and locust, also spray the ground under the plant to cover small root suckers which may not be visible above the soild surface. For oil-water mixture application, mix 6 quarts of Garlon 4, 25 gallons of oil and 1.5 gallons of an approved agricultural spray emulsifier such as Sponto 712 or Triton X-100 as indicated in the mixing directions. Treat as above. Garlon 4 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.

Cut Stump Treatment

To control resprouting, mix 20 to 30 gallons of Garlon 4 in enough oil to make 100 gallons of spray mixture. Apply with a backpack or knapsack sprayer using low pressures and a solid cone or flat fan nozzle. Spray the root collar area, 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 the size and susceptibility of species treated. 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 in Western States

To control resprouting of salt cedar and other *Tamarix* species, bigleaf maple, tanoak, Oregon myrtle, and other susceptible species, apply undiluted Garlon 4 to wet the cambium and adjacent wood around the entire circumference of the cut stump. 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. 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 in diesel or fuel oil (13 fl oz of Garlon 4 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.

Forest Management Applications

For broadcast applications, apply 1 to 6 quarts of Garlon 4 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 1 month after treatment with Garlon 4 at less than 4 quarts per acre or sooner than 2 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 before planting 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 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 per acre in tank mix combination with labeled rates of Tordon 101 Mixture or Tordon K. Tordon 101 Mixture and Tordon K are not registered for use in the state of Florida. Where grass control is also desired, Garlon 4, alone or in tank mix combination with Tordon K or Tordon 101 Mixture, 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 cannot be tank mixed with any product containing a label prohibition against such mixing.

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 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 of Garlon 4 per acre in tank mix combination with labeled rates of Tordon 101 Mixture, Tordon K, or 2,4-D low volatile ester. Tordon 101 Mixture and Tordon K are not registered for use in the state of California. Where grass control is also desired, Garlon 4, alone or in tank mix combination with Tordon 101 Mixture or Tordon K, 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 per acre. To broaden the spectrum of species controlled to include fetterbush, staggerbush, titi, and grasses, apply 2 to 3 quarts of Garlon 4 per acre 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 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 Spray 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 in enough water to make 100 gallons of spray mixture. This spray mixture should be directed onto foliage of competitive hardwoods using knapsack or 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 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 per acre. To broaden the spectrum of woody plants controlled to include fetterbush, staggerbush, and titi, apply 2 to 3 quarts of Garlon 4 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 at 4 quarts per acre or by mixtures of Garlon 4 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 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 at 1 to 1.5 quarts alone or with 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 Actively Growing: Use Garlon 4 at rates of 1 to 1.5 quarts per acre alone or with 2,4-D low volatile ester to provide no more than 3 lb ae per acre from both products. 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 at rates of 1.5 to 3 quarts per acre alone or with 2,4-D amine or 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 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 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.

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. 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. 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. 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 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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Label Code: D02-102-026
Replaces Label: D02-102-025
LOES Number: 010-00085

EPA accepted 04/18/07

Revisions:

1. Product may be applied by fixed wing aircraft or helicopter.
2. Added mixing directions section.
3. Added blackbrush, granjeno, guajillo, guava, milkweed vine, osage orange, pepper vine, trumpet creeper, twisted acacia, Virginia creeper and willow primrose to list of woody plants controlled.
4. Added biennial broadleaf weeds to list of weeds controlled.
5. Added dormant stem and cut surface treatments.

Specimen Label

Dow AgroSciences

Garlon® 4 Ultra

Specialty Herbicide

®Trademark of Dow AgroSciences LLC

For the control of woody plants and herbaceous broadleaf weeds in non-crop areas, including industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, fence rows, non-irrigation ditch banks, forests and in the establishment and maintenance of wildlife openings. Use on these sites may include application to grazed areas.

Active Ingredient:
triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid, butoxyethyl ester 60.45%
Other Ingredients 39.55%
Total 100.00%

Acid Equivalent: triclopyr - 43.46% - 4 lb/gal

Keep Out of Reach of Children

CAUTION

Agricultural Use Requirements

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

Refer to inside of label booklet for additional precautionary information including Directions for Use.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-527

Precautionary Statements

Hazards to Humans and Domestic Animals

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. Wear gloves and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category E on an EPA chemical resistance category selections chart.

Applicators and other handlers who handle this pesticide must wear:
- Long-sleeved shirt and long pants
- Chemical-resistant gloves (≥14 mils) such as barrier laminate, nitrile rubber, neoprene rubber, or viton
- 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:
- 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 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

The requirements in this box apply to forestry uses.

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 (>14 mils) such as barrier laminate, nitrile rubber, neoprene rubber, or viton
- Shoes plus socks

Non-Agricultural Use Requirements

The requirements in this box apply to all use sites on this label except for forestry uses.

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.

Storage and Disposal

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

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.

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.

General Information

Garlon® 4 Ultra specialty herbicide is recommended for the control of woody plants and herbaceous broadleaf weeds in non-crop areas, including industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides and railroads, fence rows, non-irrigation ditch banks, forests and in the establishment and maintenance of wildlife openings. Use on these sites may include application to grazed areas.

General Use Precautions and Restrictions

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

When applying this product in tank mix combination, follow all applicable use directions and precautions on each manufacturer's label.

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 unless a drift control additive, high viscosity inverting system, or equivalent is used to control spray drift.

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.

Grazing and Haying Restrictions
Except for lactating dairy animals, there are no grazing restrictions following application of this product.

- **Grazing Lactating Dairy Animals:** Do not allow lactating dairy animals to graze treated areas until the next growing season following application of this product.
- Do not harvest hay for 14 days after application.
- 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.

Slaughter Restrictions: 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 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 boom, or other systems that cannot accommodate thick sprays. Spray only when the wind velocity is low (follow state regulations). Avoid application during air inversions. If a spray thickening agent is used, follow all use recommendations and precautions on the product label.

[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:

1. The distance of the outer most operating nozzles on the boom must not exceed 3/4 the length of the 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. [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 wingspan or rotor length may further reduce drift without reducing swath width.

Application Height: Applications should not be made at a height greater than 10 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

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 K: Tordon K 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. (See product bulletin for mixing instructions.) Tordon K is not registered for use in the states of California and Florida.

Plants Controlled by Garlon 4 Ultra

Woody Plants Controlled

alder	chinquapin
madrone	scotch broom
arrowwood	choke cherry
maples	sumac
ash	cottonwood
mulberry	sweetbay magnolia
aspen	Crataegus (hawthorn)
oaks	sweetgum
bear clover (bearmat)	dogwood
persimmon	sycamore
beech	Douglas fir
pine	tanoak
birch	elderberry
poison ivy	thimbleberry
blackberry	elm
poison oak	tree-of-heaven
blackgum	gallberry
poplar	(*Ailanthus*)[1]
boxelder[1]	gorse
salmonberry	tulip poplar
Brazilian pepper	hazel
saltbush	wax myrtle
buckthorn	hickory
(*Braccharis* spp.)	wild rose
cascara	hornbeam
salt cedar[1]	willow
Ceanothus	kudzu[2]
sassafras	winged elm
cherry	locust

[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

black medic	curly dock
matchweed	sweet clover
bull thistle	dandelion
mustard	vetch
burdock	field bindweed
Oxalis	wild carrot
Canada thistle	goldenrod
plantain	(Queen Anne's lace)
chicory	ground ivy
purple loosestrife	wild lettuce
clover	lambsquarters
ragweed	wild violet
creeping beggarweed	lespedeza
smartweed	yarrow

Application Methods

- 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, including rights-of-way, fence rows or any area where grazing or harvesting is allowed.
- On forestry sites, triclopyr may be used at rates up to 6 lb ae (6 quarts of Garlon 4 Ultra) per acre per year.
- Triclopyr may be used at rates up to 8 lb ae (8 quarts of Garlon 4 Ultra) per acre per year on non-crop areas including industrial manufacturing and storage sites, non-grazed portions of rights-of-way including electrical power lines, communication lines, pipelines, roadsides and railroads, fence rows, non-irrigation ditch banks. 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.

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 Tordon(r) 101 Mixture specialty herbicide or Tordon K herbicide. Tordon 101 Mixture and Tordon K are restricted use pesticides. Tordon 101 Mixture and Tordon K are not registered for use in the states of California and Florida.

When using Garlon 4 Ultra in combination with 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 2,4-D low volatile ester herbicide, Tordon 101 Mixture, or Tordon K 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. Tordon 101 Mixture and Tordon K 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.

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 General 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 12 quarts of Garlon 4 Ultra may be applied in tank mix combination with labeled rates of Tordon K or Tordon 101 Mixture in 10 to 100 gallons of finished spray. Tordon 101 Mixture and Tordon K 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 2,4-D low volatile ester, Tordon 101 Mixture, or Tordon K in sufficient water to make 5 gallons or more per acre of total spray. Tordon 101 Mixture and Tordon K 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 2,4-D amine or low volatile ester, Tordon K, or Tordon 101 Mixture 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. Tordon 101 Mixture and Tordon K 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 General 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 2,4-D low volatile ester, Tordon 101 Mixture or Tordon K 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. Tordon 101 Mixture and Tordon K 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

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.

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 knapsack 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 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, including the root collar area, but not to the point of runoff. Herbicide concentration should vary with size 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. 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 Tordon K in Oil Tank Mix: Garlon 4 Ultra and Tordon K 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 K 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 or knapsack sprayer 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)
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 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. **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.

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 with knapsack or power spraying equipment, 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.

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 or knapsack sprayer using low pressures and a solid cone or flat fan nozzle. Spray the root collar area, 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. 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 in Western States
To control resprouting of salt cedar and other Tamarix species, bigleaf maple, tanoak, Oregon myrtle, and other susceptible species, apply undiluted Garlon 4 Ultra to wet the cambium and adjacent wood around the entire circumference of the cut stump. 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 that can be calibrated to deliver the small amounts of material required.

Forest Management Applications

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 Tordon 101 Mixture or Tordon K. Tordon 101 Mixture and Tordon K 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 K or Tordon 101 Mixture, 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 Tordon 101 Mixture, Tordon K, or 2,4-D low volatile ester. Tordon 101 Mixture and Tordon K 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 Tordon 101 Mixture or Tordon K, 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 knapsack or 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 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 2,4-D low volatile ester to provide no more than 3 lb ae per acre from both products. 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 2,4-D amine or 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 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.

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. 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. 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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Revisions:

1. Added Mixing Directions section.
2. Added additional directions for high volume foliage treatment.
3. Added stem and cut surface treatments.

DuPont™ Krenite® S

brush control agent

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DuPont™ Krenite® S

brush control agent

Water Soluble Liquid

Contains 4 Lbs. Active Ingredient Per Gallon

Active Ingredient	*By Weight*
Ammonium salt of fosamine [ethyl hydrogen (aminocarbonyl) phosphonate]	41.5%
Inert Ingredients	58.5%
TOTAL	100%

EPA Reg. No. 352-395 EPA Est. No._____

Nonrefillable Container

Net: _____

OR

Refillable Container

Net: _____

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 this label, find someone to explain it to you in detail.)

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five 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 1-800-441-3637 for medical emergencies involving this product.

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:

Long-sleeve 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.

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.

GENERAL INFORMATION

DuPont™ 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 is recommended 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 non-volatile.

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 display 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 adjuvants registered for use in pine plantations and non-crop sites.

Refer to the label of the tank mix partner(s) for any additional use instructions or restrictions.

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 should be used only in accordance with recommendations on this label or in supplemental DuPont 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:

Coveralls.

Shoe plus socks.

PINE PLANTATIONS - SITE PREPARATION

DuPont™ KRENITE® S is recommended 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, generally 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 is recommended 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.

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 (groundseltree), Vaccinium (blueberry) species, Waxmyrtle (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 is recommended 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 DuPont™ 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

Amount of Krenite® S

Desired Volume	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*
Ash, white	*Fraxinus Americana*
Aspen, quaking	*Populus tremuloides*
Birch	*Betula sp.*
Blackberry	*Rubus sp.*
Blackgum	*Nyssa sylvatica*
Cherry, black**	*Prunus serotina*
Cherry, pin	*Prunus pensylvanica*
Chokecherry, common**	*Prunus virginiana*
Elm**	*Ulmus sp.*
Fern, bracken	*Pteridium aquilinum*
Hawthorn**	*Crataegus sp.*
Hickory**	*Carya sp.*
Locust, black	*Robinia pseudoacacia*
Maple, bigleaf**	*Acer macrophyllum*
Maple, red**	*Acer rubrum*
Maple, vine	*Acer circinatum*
Oak, red	*Quercus rubra*
Oak, water	*Quercus arkansana*
Oak, white	*Quercus alba*
Persimmon**	*Diospyros virginiana*
Pine, loblolly	*Pinus taeda*
Pine, Virginia	*Pinus virginiana*
Poplar, yellow (tuliptree)**	*Liriodendron tulipifera*
Salmonberry	*Rubus spectabilis*
Sassafras**	*Sassafras sassafras*
Sourwood**	*Oxydendrum arboretum*
Spurge, leafy***	*Euphorbia esula*
Sumac	*Rhus sp.*
Sweetgum	*Liquidambar styraciflua*
Tallow, Chinese	*Sapium sebiferum*
Thimbleberry	*Rubus parviflorus*
Willow**	*Salix sp.*

2 to 6 gal KRENITE® S per acre

Basswood, American**	*Tilia Americana*
Bindweed, field***	*Convolvulus arvensis*
Cottonwood, Eastern	*Populus deltoids*
Elder, American	*Sambucus canadensis*
Elm, slippery	*Ulmus rubra*
Elm, winged**	*Ulmus alata*
Grape, wild	*Vitis sp.*
Pine, Eastern white	*Pinus strobes*
Plum, wild	*Prunus munsoniana*
Rose, multiflora	*Rosa multiflora*
Sycamore	*Platanus occidentalis*
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 DuPont™ ESCORT® XP

KRENITE® S plus ESCORT® XP is recommended 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.

DuPont™ KRENITE® S plus imazapyr

KRENITE® S plus imazapyr herbicide (2 pounds active ingredient per gallon) is recommended 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.

KRENITE® S plus picloram

KRENITE® S plus picloram (2 pound active per gallon) herbicide is recommended 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.

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 is recommended in 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.

SPRAYER 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 results 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 DuPont™ KRENITE® S containing ammonium salt of fosamine [ethyl hydrogen (aminocarbonyl) phosphonate] 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 DuPont 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 DuPont at the number below for instructions. *Disposing of Container:* Do not reuse this container for any other purpose other than refilling (see preceding). 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 DuPont at 1-800-441-3637, day or night.

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

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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 farming techniques, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of DuPont. These risks can cause: ineffectiveness of the product, crop injury, or injury to non-target crops or plants. WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.

DuPont 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.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, DUPONT MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL DUPONT 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 DUPONT 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 DUPONT OR SELLER, THE REPLACEMENT OF THE PRODUCT.

To the extent consistent with applicable law that allows such requirement, DuPont 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 DuPont or a DuPont 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.

For product information call: 1-888-6-DUPONT

Internet address: www.dupont.com/ag/us

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Specimen Label

Dow AgroSciences

Rodeo®

Herbicide

For control of annual and perennial weeds and woody plants in forests, non-crop sites, and in and around aquatic sites; also for use in wildlife habitat areas, 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(s):	
glyphosate[1] N-(phosphonomethyl)glycine, isopropylamine salt	53.8%
Other Ingredients	46.2%
Total Ingredients	100.0%

[1] Contains 5.4 pounds per gallon glyphosate, isopropylamine salt (4 pounds per gallon glyphosate acid).

EPA Reg. No. 62719-324

Keep Out of Reach of Children

CAUTION PRECAUCION

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

Precautionary Statements

Hazards to Humans and Domestic Animals

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 (Personal Protective Equipment). 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.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Terms and Conditions of Use, Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies elsewhere on this label. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

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. See Individual container label for repackaging limitations.

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 Reuse: 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 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 larger than 5 gallons:
Container Reuse: 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.

Nonrefillable containers larger than 5 gallons:
Container Reuse: 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.

General Information
(How this product works)

This product is a water-soluble liquid, which mixes readily with water and nonionic surfactant to be applied as a foliar spray for the control or destruction of many herbaceous and woody plants. This product is intended for control of annual and perennial weeds and woody plants in forests, pine straw plantations, non-crop sites such as utility rights-of-way, and in and around aquatic sites; also for use in wildlife habitat areas, for perennial grass release, and grass growth suppression and grazed areas on these sites.

The active ingredient in this product moves through the plant from the point of foliage contact to and into the root system. Visible effects on most annual weeds occur within 2 to 4 days, 7 days or more on most perennial weeds, and 30 days or more on most woody plants. Extremely cool or cloudy weather following treatment may slow the activity of this product and delay visual effects of control. Visible effects include gradual wilting and yellowing of the plant which advances to complete browning of above-ground growth and deterioration of underground plant parts.

Unless otherwise directed on this label, delay application until vegetation has emerged and reached the stages described for control of such vegetation under the "Weeds Controlled" section of this label.

Unemerged plants arising from unattached underground rhizomes or root stocks of perennials or brush will not be affected by the spray and will continue to grow. For this reason best control of most perennial weeds or brush is obtained when treatment is made at late growth stages approaching maturity.

Always use the higher rate of this product and surfactant within the recommended range when vegetation is heavy or dense, when treating dense multi-canopied sites or woody vegetation or difficult-to-control herbaceous or woody plants.

Do not treat weeds, brush or trees under poor growing conditions such as drought stress, disease or insect damage, as reduced control may result. Reduced control of target vegetation may also occur if foliage is heavily covered with dust at the time of treatment.

Reduced control may result when applications are made to woody plants or weeds following site disturbance or plant top growth removal from grazing, mowing, logging or mechanical brush control. For best results, delay treatment of such areas until resprouting and foliar growth has restored the target vegetation to the recommended stage of growth for optimum herbicide exposure and control.

Rainfall or irrigation occurring within 6 hours after application may reduce effectiveness. Heavy rainfall or irrigation within 2 hours after application may wash the product off the foliage and a repeat treatment may be required.

This product does not provide residual weed control. For subsequent residual weed control, follow a label-approved herbicide program. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used.

Note: The maximum rates stated throughout this product's labeling apply to this product combined with the use of all other herbicides containing glyphosate or sulfosate as the active ingredient, whether applied as mixtures or separately. Calculate the application rates and ensure that the total use of this and other glyphosate or sulfosate containing products does not exceed the maximum use rates.

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, such as 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 of greater than 4.5 but not to exceed 7.5 quarts per acre, no more than 15 percent of the available grazing area may be treated.
  - ▶ For application rates that do not exceed 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.

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. When not in use, keep container closed to prevent spills and contamination.

Buyer and all users are responsible for all loss or damage in connection with the use or handling of mixtures of this product or other materials that are not expressly recommended in this label. Mixing this product with herbicides or other materials not recommended in this label may result in reduced performance.

ATTENTION: Avoid drift. Extreme care must be used 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 plant or crop injury occurring from the use of this product is greatest when winds are gusty or in excess of 5 miles per hour or when other conditions, including lesser wind velocities, will allow spray drift to occur. 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.**

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.

1. The distance of the outer most 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 should be observed.

The applicator should be familiar with and take into account the information covered in the following **Aerial Drift Reduction Advisory Information**:

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 drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversion section of this label).

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-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 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 backwards, parallel to the airstream will produce larger droplets than other orientations. Significant deflection from the 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 larger droplets than other nozzle types.

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-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 2-10 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 drift.

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

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

Mixing And Application Instructions

Apply these spray solutions in properly maintained and calibrated equipment capable of delivering desired volumes. Hand-gun applications should be properly directed to avoid spraying desirable plants. Note: reduced results may occur if water containing soil is used, such as water from ponds and unlined ditches.

Mixing

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 water while adding the required amount of this product (see "Directions for Use" and "Weeds Controlled" sections of this label).
2. Near the end of the filling process, add the required surfactant and mix well. Remove hose from tank immediately after filling to avoid siphoning back into the water source.

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.

During mixing and application, foaming of the spray solution may occur. To prevent or minimize foam, avoid the use of mechanical agitators, place the filling hose below the surface of the spray solution (only during filling), terminate by-pass and return lines at the bottom of the tank, and, if needed, use an approved anti-foam or defoaming agent.

Keep by-pass line on or near bottom of tank to minimize foaming. Screen size in nozzle or line strainers should be no finer than 50 mesh. Carefully select correct nozzle to avoid spraying a fine mist. For best results with conventional ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

IMPORTANT: When using this product, unless otherwise specified, mix with a surfactant such as a non-ionic 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).
Always read and follow the manufacturer's surfactant label recommendations for best results.

Colorants or marking dyes approved for use with herbicides may be added to spray mixtures of 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 label recommendations.

Clean sprayer and parts immediately after using this product by thoroughly flushing with water and dispose of rinsate according to labeled use or disposal instructions.

Carefully observe all cautionary statements and other information appearing in the surfactant label.

Application Equipment And Techniques

ATTENTION: AVOID DRIFT. EXTREME CARE MUST BE EXERCISED 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 crops, plants, or other areas on which the treatment was not intended. The likelihood of plant or crop injury occurring from the use of this product is greatest when winds are gusty or in excess of 5 miles per hour or when other conditions, including lesser wind velocities, will allow spray drift to occur. 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 a manner not consistent with this label may result in injury to persons, animals, or crops, or other unintended consequences. When not in use, keep container closed to prevent spills and contamination.

Aerial Equipment

For aerial application of this product in California, refer to Federal supplemental label for this product entitled "For Aerial Application in California Only". In California, aerial application may be made in aquatic sites and noncrop areas, including aquatic sites present in noncrop areas that are part of the intended treatment.

For control of weed or brush species listed in this label using aerial application equipment: For aerial broadcast application, unless otherwise specified, apply the rates of this product and surfactant recommended for broadcast application in a spray volume of 3 to 20 gallons of water per acre. See the "Weeds Controlled" section of this label for labeled annual and herbaceous weeds and woody plants and broadcast rate recommendations. Aerial applications of this product may only be made as specifically recommended in this label.

AVOID DRIFT. Do not apply during inversion conditions, when winds are gusty or under any other condition which will allow 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.

Coarse sprays are less likely to drift; therefore, do not use nozzles or nozzle configurations which dispense spray as fine spray droplets. Do not angle nozzles forward into the airstream and do not increase spray volume by increasing nozzle pressure.

Drift control additives may be used. When a drift control additive is used, read and carefully observe the cautionary statements and all other information appearing in the additive label. The use of a drift control agent for conifer and herbaceous release applications may result in conifer injury and is not recommended.

Ensure uniform application. To avoid streaked, uneven or overlapped application, use appropriate marking devices.

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 are most susceptible.** The maintenance of an organic coating (paint) which meets aerospace specification MIL-C-38413 may prevent corrosion.

Ground Broadcast Equipment

For control of weed or brush species listed in this label using conventional boom equipment: For ground broadcast application, unless otherwise specified, apply the rates of this product and surfactant recommended for broadcast application in a spray volume of 3 to 30 gallons of water per acre. See the "Weeds Controlled" section of this label for labeled annual and herbaceous weeds and woody plants and broadcast rate recommendations. As density of vegetation increases, spray volume should be increased within the recommended range to ensure complete coverage. Carefully select correct nozzle to avoid spraying a fine mist. For best results with ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

Forestry and Utility Rights-of-Way Sites: This product is recommended for broadcast applications using suitable ground equipment in forestry sites, utility sites, and utility rights-of way. Apply the recommended rates of this product and surfactant in a spray volume of 10 to 60 gallons per acre. Check for even distribution of spray droplets.

Hand-Held and High-Volume Equipment
(Use Coarse Sprays Only)

For control of weeds listed in this label using knapsack sprayers or high-volume spraying equipment utilizing handguns or other suitable nozzle arrangements:

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 in this label.

Applications should be made on a spray-to-wet basis. Spray coverage should be uniform and complete. 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 zig-zag 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. Small, open-branched trees need only be treated from one side. If the foliage is thick or there are multiple root sprouts, applications must be made from several sides to ensure adequate spray coverage.

Prepare the desired volume of spray solution by mixing the amount of this product in water, shown in the following table:

Spray Solution

Desired Volume	Amount of this product							
	3/4%	1%	1 1/4%	1 1/2%	2%	5%	8%	10%
1 gal	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	12 3/4 fl oz
25 gal	1 1/2 pt	1 qt	1 1/4 qt	1 1/2 qt	2 qt	5 qt	2 gal	2.5 gal
100 gal	3 qt	1 gal	1 1/4 gal	1 1/2 gal	2 gal	5 gal	8 gal	10 gal

2 tablespoons = 1 fluid ounce

For use in knapsack sprayers, it is suggested that the recommended amount of this product be mixed with water in a larger container. Fill the knapsack sprayer with the mixed solution and add the correct amount of surfactant.

Selective Equipment

This product may be applied through shielded sprayers or wiper application equipment. This equipment may be used to selectively control undesirable vegetation without harming desirable vegetation.

Shielded sprayers direct the herbicide solution onto weeds while shielding desirable vegetation from the spray solution. Any recommended rate or tank mixture of this product may be used employing this equipment.

Wiper applicators physically wipe product directly onto undesirable vegetation. Care should be taken to avoid wiping desirable vegetation. Use a 33 to 100 percent solution of this product, diluted in water for wiper applications. Use a 33 percent solution for wick or gravity feed systems. Higher concentrations may be used in pressurized systems that are capable of handling thicker solutions. Addition of a nonionic surfactant at a rate of 10 percent by volume of total herbicide solution is recommended.

Weeds Controlled

Annual Weeds

Apply to actively growing annual grasses and broadleaf weeds.

Allow at least 3 days after application before disturbing treated vegetation. After this period the weeds may be mowed, tilled or burned. See "Directions for Use," "General Information" and "Mixing and Application Instructions" for labeled uses and specific application instructions.

Broadcast Application Rates: For weeds less than 6 inches tall, use 1 1/2 pints of this product per acre plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient. If weeds are greater than 6 inches tall, use 2½ pints of this product per acre plus a non-ionic surfactant containing 80% or greater active ingredient..

Hand-Held, High-Volume Application Rates: Use a 3/4 percent solution of this product in water plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient. Apply to foliage of vegetation to be controlled.

When applied as directed, this product plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient will control the following annual weeds:

Common Name	Scientific Name
Balsamapple [1]	*Momordica charantia*
Barley	*Hordeum vulgare*
Barnyardgrass	*Echinochloa crus-galli*
Bassia, fivehook	*Bassia hyssopifolia*
Bluegrass, annual	*Poa annua*
Bluegrass, bulbous	*Poa bulbosa*
Brome	*Bromus spp.*
Buttercup	*Ranunculus spp.*
Cheat	*Bromus secalinus*
Chickweed, mouseear	*Cerastium vulgatum*
Cocklebur	*Xanthium strumarium*
Corn, volunteer	*Zea mays*
Crabgrass	*Digitaria spp.*
Dwarfdandelion	*Krigia cespitosa*
Falseflax, smallseed	*Camelina microcarpa*
Fiddleneck	*Amsinckia spp.*
Flaxleaf fleabane	*Conyza bonariensis*
Fleabane	*Erigeron spp.*
Foxtail	*Setaria spp.*
Foxtail, Carolina	*Alopecurus carolinianus*
Groundsel, common	*Senecio vulgaris*
Horseweed/Marestail	*Conyza canadensis*
Kochia	*Kochia scoparia*
Lambsquarters, common	*Chenopodium album*
Lettuce, prickly	*Lactuca serriola*
Morningglory	*Ipomoea spp.*
Mustard, blue	*Chorispora tenella*
Mustard, tansy	*Descurainia pinnata*
Mustard, tumble	*Sisymbrium altissimum*
Mustard, wild	*Sinapis arvensis*
Oats, wild	*Avena fatua*
Panicum	*Panicum spp.*
Pennycress, field	*Thlaspi arvense*
Pigweed, redroot	*Amaranthus retroflexus*
Pigweed, smooth	*Amaranthus hybridus*
Ragweed, common	*Ambrosia artemisiifolia*
Ragweed, giant	*Ambrosia trifida*
Rocket, London	*Sisymbrium irio*
Rye	*Secale cereale*
Ryegrass, Italian [11]	*Lolium multiflorum*
Sandbur, field	*Cenchrus spp.*
Shattercane	*Sorghum bicolor*
Shepherd's-purse	*Capsella bursa-pastoris*
Signalgrass, broadleaf	*Brachiaria platyphylla*
Smartweed, Pennsylvania	*Polygonum pensylvanicum*
Sowthistle, annual	*Sonchus oleraceus*
Spanishneedles [11]	*Bidens bipinnata*
Stinkgrass	*Eragrostis cilianensis*
Sunflower	*Helianthus annuus*
Thistle, Russian	*Salsola kali*
Spurry, umbrella	*Holosteum umbellatum*
Velvetleaf	*Abutilon theophrasti*
Wheat	*Triticum aestivum*
Witchgrass	*Panicum capillare*

[1] Apply with hand-held equipment only.
[11] Apply 3 pints of this product per acre.

Annual weeds will generally continue to germinate from seed throughout the growing season. Repeat treatments will be necessary to control later germinating weeds.

Perennial Weeds

Apply this product to control most vigorously growing perennial weeds. Unless otherwise directed, apply when target plants are actively growing and most have reached early head or early bud stage of growth. Unless otherwise directed, allow at least 7 days after application before disturbing vegetation.

NOTE: If weeds have been mowed or tilled, do not treat until regrowth has reached the recommended stages. Fall treatments must be applied before a killing frost.

Repeat treatments may be necessary to control weeds regenerating from underground parts or seed.

Specific Weed Control Recommendations: For perennial weeds, apply the recommended rate plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. .
When applied as directed, this product plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient will control the following perennial weeds: (Numbers in parentheses "(-)" following common name of a listed weed species refer to "Specific Perennial Weed Control Recommendations" for that weed which follow the species listing.)

Common Name	Scientific Name
Alfalfa (31)	*Medicago sativa*
Alligatorweed [1] (1)	*Alternanthera philoxeroides*
Anise/Fennel (31)	*Foeniculum vulgare*
Artichoke, Jerusalem (31)	*Helianthus tuberosus*
Bahiagrass (31)	*Paspalum notatum*
Bermudagrass (2)	*Cynodon dactylon*
Bindweed, field (3)	*Convolvulus arvensis*
Bluegrass, Kentucky (12)	*Poa pratensis*
Blueweed, Texas (3)	*Helianthus ciliaris*
Brackenfern (4)	*Pteridium spp.*
Bromegrass, smooth (12)	*Bromus inermis*
Canarygrass, reed (12)	*Phalaris arundinacea*
Cattail (5)	*Typha spp.*
Clover, red (31)	*Trifolium pratense*
Clover, white (31)	*Trifolium repens*
Cogongrass (6)	*Imperata clylindrica*
Cordgrass (7)	*Spartina spp.*
Cutgrass, giant [1] (8)	*Zizaniopsis miliacea*
Dallisgrass (31)	*Paspalum dilatatum*
Dandelion (31)	*Taraxacum officinale*
Dock, curly (31)	*Rumex crispus*
Dogbane, hemp (9)	*Apocynum cannabinum*
Fescue (31)	*Festuca spp.*
Fescue, tall (10)	*Festuca arundinacea*
Guineagrass (11)	*Panicum maximum*
Hemlock, poison (31)	*Conium maculatum*
Horsenettle (31)	*Solanum carolinense*
Horseradish (9)	*Armoracia rusticana*
Ice Plant (22)	*Mesembryanthemum crystallinum*
Johnsongrass (12)	*Sorghum halepense*
Kikuyugrass (21)	*Pennisetum clandestinum*

Common Name	Scientific Name
Knapweed (9)	*Centaurea repens*
Lantana (13)	*Lantana camara*
Lespedeza, common (31)	*Lespedeza striata*
Lespedeza, sericea (31)	*Lespedeza cuneata*
Loosestrife, purple (14)	*Lythrum salicaria*
Lotus, American (15)	*Nelumbo lutea*
Maidencane (16)	*Panicum hematomon*
Milkweed (17)	*Asclepias spp.*
Muhly, wirestem (21)	*Muhlenbergia frondosa*
Mullein, common (31)	*Verbascum thapsus*
Napiergrass (31)	*Pennisetum purpureum*
Nightshade, silverleaf (3)	*Solanum elaeagnifolium*
Nutsedge, purple (18)	*Cyperus rotundus*
Nutsedge, yellow (18)	*Cyperus esculentus*
Orchardgrass (12)	*Dactylis glomerata*
Pampasgrass (19)	*Cortaderia jubata*
Paragrass (16)	*Brachiaria mutica*
Phragmites[††] (20)	*Phragmites spp.*
Quackgrass (21)	*Agropyron repens*
Reed, giant (22)	*Arundo donax*
Ryegrass, perennial (12)	*Lolium perenne*
Smartweed, swamp (31)	*Polygonum coccineum*
Spatterdock (23)	*Nuphar luteum*
Starthistle, yellow (31)	*Centaurea solstitialis*
Sweet potato, wild [†] (24)	*Ipomoea pandurata*
Thistle, artichoke (25)	*Cynara cardunculus*
Thistle, Canada (25)	*Cirsium arvense*
Timothy (12)	*Phleum pratense*
Torpedograss [†] (26)	*Panicum repens*
Tules, common (27)	*Scirpus acutus*
Vaseygrass (31)	*Paspalum urvillei*
Velvetgrass (31)	*Holcus spp.*
Waterhyacinth (28)	*Eichornia crassipes*
Waterlettuce (29)	*Pistia stratiotes*
Waterprimrose (30)	*Ludwigia spp.*
Wheatgrass, western (12)	*Agropyron smithii*

[†] Partial control.

[††] Partial control in southeastern states. See "Specific Weed Control Recommendations" below.

Specific Perennial Weed Control Recommendations:

1. **Alligatorweed:** Apply 6 pints of this product per acre as a broadcast spray or as a 1 1/4 percent solution with hand-held equipment to provide partial control of alligatorweed. Apply when most of the target plants are in bloom. Repeat applications will be required to maintain such control.
2. **Bermudagrass:** Apply 7 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Apply when target plants are actively growing and when seedheads appear.
3. **Bindweed, field / Silverleaf Nightshade / Texas Blueweed:** Apply 6 to 7 1/2 pints of this product per acre as a broadcast spray west of the Mississippi River and 4 1/2 to 6 pints of this product per acre east of the Mississippi River. With hand-held equipment, use a 1 1/2 percent solution. Apply when target plants are actively growing and are at or beyond full bloom. For silverleaf nightshade, best results can be obtained when application is made after berries are formed. Do not treat when weeds are under drought stress. New leaf development indicates active growth. For best results apply in late summer or fall.
4. **Brackenfern:** Apply 4 1/2 to 6 pints of this product per acre as a broadcast spray or as a 3/4 to 1 percent solution with hand-held equipment. Apply to fully expanded fronds which are at least 18 inches long.
5. **Cattail:** Apply 4 1/2 to 6 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when target plants are actively growing and are at or beyond the early-to-full bloom stage of growth. Best results are achieved when application is made during the summer or fall months.
6. **Cogongrass:** Apply 4 1/2 to 7 1/2 pints of this product per acre as a broadcast spray. Apply when cogongrass is at least 18 inches tall and actively growing in late summer or fall. Allow 7 or more days after application before tillage or mowing. Due to uneven stages of growth and the dense nature of vegetation preventing good spray coverage, repeat treatments may be necessary to maintain control.
7. **Cordgrass:** Apply 4 1/2 to 7 1/2 pints of this product per acre as a broadcast spray or as a 1 to 2 percent solution with hand-held equipment. Schedule applications in order to allow 6 hours before treated plants are covered by tidewater. The presence of debris and silt on the cordgrass plants will reduce performance. It may be necessary to wash targeted plants prior to application to improve uptake of this product into the plant.
8. **Cutgrass, giant:** Apply 6 pints of this product per acre as a broadcast spray or as a 1 percent solution with hand-held equipment to provide partial control of giant cutgrass. Repeat applications will be required to maintain such control, especially where vegetation is partially submerged in water. Allow for substantial regrowth to the 7 to 10-leaf stage prior to retreatment.
9. **Dogbane, hemp / Knapweed / Horseradish:** Apply 6 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the late bud-to-flower stage of growth. For best results, apply in late summer or fall.
10. **Fescue, tall:** Apply 4 1/2 pints of this product per acre as a broadcast spray or as a 1 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the boot-to-head stage of growth. When applied prior to the boot stage, less desirable control may be obtained.
11. **Guineagrass:** Apply 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when target plants are actively growing and when most have reached at least the 7-leaf stage of growth.
12. **Johnsongrass / Bluegrass, Kentucky / Bromegrass, smooth / Canarygrass, reed / Orchardgrass / Ryegrass, perennial / Timothy / Wheatgrass, western:** Apply 3 to 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the boot-to-head stage of growth. When applied prior to the boot stage, less desirable control may be obtained. In the fall, apply before plants have turned brown.
13. **Lantana:** Apply this product as a 3/4 to 1 percent solution with hand-held equipment. Apply to actively growing lantana at or beyond the bloom stage of growth. Use the higher application rate for plants that have reached the woody stage of growth.
14. **Loosestrife, purple:** Apply 4 pints of this product per acre as a broadcast spray or as a 1 to 1 1/2 percent solution using hand-held equipment. Treat when plants are actively growing at or beyond the bloom stage of growth. Best results are achieved when application is made during summer or fall months. Fall treatments must be applied before a killing frost.

15. **Lotus, American:** Apply 4 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Treat when plants are actively growing at or beyond the bloom stage of growth. Best results are achieved when application is made during summer or fall months. Fall treatments must be applied before a killing frost. Repeat treatment may be necessary to control regrowth from underground parts and seeds.
16. **Maidencane / Paragrass:** Apply 6 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Repeat treatments will be required, especially to vegetation partially submerged in water. Under these conditions, allow for regrowth to the 7 to 10-leaf stage prior to retreatment.
17. **Milkweed, common:** Apply 4 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Apply when target plants are actively growing and most have reached the late bud-to-flower stage of growth.
18. **Nutsedge: purple, yellow:** Apply 4 1/2 pints of this product per acre as a broadcast spray, or as a 3/4 percent solution with hand-held equipment to control existing nutsedge plants and immature nutlets attached to treated plants. Apply when target plants are in flower or when new nutlets can be found at rhizome tips. Nutlets which have not germinated will not be controlled and may germinate following treatment. Repeat treatments will be required for long-term control.
19. **Pampasgrass:** Apply a 1 1/2 percent solution of this product with hand-held equipment when plants are actively growing.
20. **Phragmites:** For partial control of phragmites in Florida and the counties of other states bordering the Gulf of Mexico, apply 7 1/2 pints per acre as a broadcast spray or apply a 1 1/2 percent solution with hand-held equipment. In other areas of the U.S., apply 4 to 6 pints per acre as a broadcast spray or apply a 3/4 percent solution with hand-held equipment for partial control. For best results, treat during late summer or fall months when plants are actively growing and in full bloom. Due to the dense nature of the vegetation, which may prevent good spray coverage and uneven stages of growth, repeat treatments may be necessary to maintain control. Visual control symptoms will be slow to develop.
21. **Quackgrass / Kikuyugrass / Muhly, wirestern:** Apply 3 to 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment when most quackgrass or wirestem muhly is at least 8 inches in height (3 to 4-leaf stage of growth) and actively growing. Allow 3 or more days after application before tillage.
22. **Reed, giant / ice plant:** For control of giant reed and ice plant, apply a 1 1/2 percent solution of this product with hand-held equipment when plants are actively growing. For giant reed, best results are obtained when applications are made in late summer to fall.
23. **Spatterdock:** Apply 6 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Apply when most plants are in full bloom. For best results, apply during the summer or fall months.
24. **Sweet potato, wild:** Apply this product as a 1 1/2 percent solution using hand-held equipment. Apply to actively growing weeds that are at or beyond the bloom stage of growth. Repeat applications will be required. Allow the plant to reach the recommended stage of growth before retreatment.
25. **Thistle, Canada / artichoke:** Apply 3 to 4 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment for Canada thistle. To control artichoke thistle, apply a 2 percent solution as a spray-to-wet application. Apply when target plants are actively growing and are at or beyond the bud stage of growth.
26. **Torpedograss:** Apply 6 to 7 1/2 pints of this product per acre as a broadcast spray or as a 3/4 to 1 1/2 percent solution with hand-held equipment to provide partial control of torpedograss. Use the lower rates under terrestrial conditions, and the higher rates under partially submerged or a floating mat condition. Repeat treatments will be required to maintain such control.
27. **Tules, common:** Apply this product as a 1 1/2 percent solution with hand-held equipment. Apply to actively growing plants at or beyond the seedhead stage of growth. After application, visual symptoms will be slow to appear and may not occur for 3 or more weeks.
28. **Waterhyacinth:** Apply 5 to 6 pints of this product per acre as a broadcast spray or apply a 3/4 to 1 percent solution with hand-held equipment. Apply when target plants are actively growing and at or beyond the early bloom stage of growth. After application, visual symptoms may require 3 or more weeks to appear with complete necrosis and decomposition usually occurring within 60 to 90 days. Use the higher rates when more rapid visual effects are desired.
29. **Waterlettuce:** For control, apply a 3/4 to 1 percent solution of this product with hand-held equipment to actively growing plants. Use higher rates where infestations are heavy. Best results are obtained from mid-summer through winter applications. Spring applications may require retreatment.
30. **Waterprimrose:** Apply this product as a 3/4 percent solution using hand-held equipment. Apply to plants that are actively growing at or beyond the bloom stage of growth, but before fall color changes occur. Thorough coverage is necessary for best control.
31. **Other perennial weeds listed above:** Apply 4 1/2 to 7 1/2 pints of this product per acre as a broadcast spray or apply as a 3/4 to 1 1/2 percent solution with hand-held equipment.

Woody Brush and Trees

NOTE: If brush has been mowed or tilled or trees have been cut, do not treat until regrowth has reached the recommended stage of growth.

Application Rates and Timing
When applied as a 5 to 8 percent solution as a directed application as described in the "Hand-Held and High-Volume Equipment" section, this product will control or partially control all wood brush and tree species listed in this section of this label. Use the higher rate of application for dense stands and larger woody brush and trees.

Specific Brush or Tree Control Recommendations: Numbers in parentheses "(-)" following the common name of a listed brush or tree species refer to "Specific Brush or Tree Control Recommendations" which follow the species listing. See this section for specific application rates and timing for listed species.

For woody brush and trees, apply the recommended rate plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. Make applications when plants are actively growing and, unless otherwise directed, after full-leaf expansion. Use the higher rate for larger plants and/or dense areas of growth. On vines, use the higher 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 application is 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. Symptoms may not appear prior to frost or senescence with fall treatments.

Allow 7 or more days after application before tillage, mowing or removal. Repeat treatments 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.

See the "Directions for Use" and "Mixing and Application Instructions" sections in this label for labeled use and specific application instructions. **When applied as directed, this product plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient will control the following woody brush plants and trees:** (Numbers in parentheses "(-)" following common name of a listed brush or tree species refer to "Specific Brush or Tree Control Recommendations" for that species which follow the species listing.)

Common Name	Scientific Name
Alder (1)	*Alnus spp.*
Ash [1] (20)	*Fraxinus spp.*
Aspen, quaking (2)	*Populus tremuloides*
Bearclover, Bearmat (20)	*Chamaebatia foliolosa*
Birch (3)	*Betula spp.*
Blackberry (1)	*Rubus spp.*
Broom, French (4)	*Cytisus monspessulanus*
Broom, Scotch (4)	*Cytisus scoparius*
Buckwheat, California [1] (5)	*Eriogonum fasciculatum*
Cascara [1] (20)	*Rhamnus purshiana*
Catsclaw [1] (6)	*Acacia greggi*
Ceanothus (20)	*Ceanothus spp.*
Chamise (17)	*Adenostoma fasciculatum*
Cherry, bitter (7)	*Prunus emarginata*
Cherry, black (7)	*Prunus serotina*
Cherry, pin (7)	*Prunus pensylvanica*
Coyote brush (8)	*Baccharis consanguinea*
Creeper, Virginia [1] (20)	*Parthenocissus quinquefolia*
Dewberry (1)	*Rubus trivialis*
Dogwood (9)	*Cornus spp.*
Elderberry (3)	*Sambucus spp.*
Elm [1] (20)	*Ulmus spp.*
Eucalyptus, bluegum (10)	*Eucalyptus globulus*
Hasardia [1] (5)	*Haplopappus squamosus*
Hawthorn (2)	*Crataegus spp.*
Hazel (3)	*Corylus spp.*
Hickory (9)	*Carya spp.*
Holly, Florida (11) (Brazilian peppertree)	*Schinus terebinthifolius*
Honeysuckle (1)	*Lonicera spp.*
Hornbeam, American (20)	*Carpinus caroliniana*
Kudzu (12)	*Pueraria lobata*
Locust, black [1] (20)	*Robinia pseudoacacia*
Manzanita (20)	*Arctostaphylos spp.*
Maple, red [1] (13)	*Acer rubrum*
Maple, sugar (14)	*Acer saccharum*
Maple, vine [1] (20)	*Acer circinatum*
Monkey flower [1] (5)	*Mimulus guttatus*
Oak, black [1] (20)	*Quercus velutina*
Oak, northern pin (14)	*Quercus palustris*
Oak, post (1)	*Quercus stellata*
Oak, red (14)	*Quercus rubra*
Oak, southern red (7)	*Quercus falcata*
Oak, white [1] (20)	*Quercus alba*
Persimmon [1] (20)	*Diospyros spp.*
Poison-ivy (15)	*Rhus radicans*
Poison-oak (15)	*Rhus toxicodendron*
Poplar, yellow [1] (20)	*Liriodendron tulipifera*
Prunus (7)	*Prunus spp.*
Raspberry (1)	*Rubus spp.*
Redbud, eastern (20)	*Cercis canadensis*
Rose, multiflora (16)	*Rosa multiflora*
Russian-olive (20)	*Elaeagnus angustifolia*
Sage: black (17), white	*Salvia spp.*
Sagebrush, California (17)	*Artemisia californica*
Salmonberry (3)	*Rubus spectabilis*
Salt cedar [1] (9)	*Tamarix spp.*
Saltbush, sea myrtle (18)	*Baccharis halimifolia*
Sassafras (20)	*Sassafras aibidum*
Sourwood [1] (20)	*Oxydendrum arboreum*
Sumac, poison [1] (20)	*Rhus vernix*
Sumac, smooth [1] (20)	*Rhus glabra*
Sumac, winged [1] (20)	*Rhus copallina*
Sweetgum (7)	*Liquidambar styraciflua*
Swordfern [1] (20)	*Polystichum munitum*
Tallowtree, Chinese (17)	*Sapium sebiferum*
Thimbleberry (3)	*Rubus parviflorus*
Tobacco, tree [1] (5)	*Nicotiana glauca*
Trumpetcreeper (2)	*Campsis radicans*
Waxmyrtle, southern [1] (11)	*Myrica cerifera*
Willow (19)	*Salix spp.*

[1] Partial control (See below for control or partial control instructions.)

Specific Brush or Tree Control Recommendations:

1. **Alder / Blackberry / Dewberry / Honeysuckle / Oak, Post / Raspberry**: For control, apply 4 1/2 to 6 pints per acre as a broadcast spray or as a 3/4 to 1 1/4 percent solution with hand-held equipment.
2. **Aspen, Quaking / Hawthorn / Trumpetcreeper**: For control, apply 3 to 4 1/4 pints of this product per acre as a broadcast spray or as a 3/4 to 1 1/4 percent solution with hand-held equipment.
3. **Birch / Elderberry / Hazel / Salmonberry / Thimbleberry**: For control, apply 3 pints per acre of this product as a broadcast spray or as a 3/4 percent solution with hand-held equipment.
4. **Broom, French / Broom, Scotch:** For control, apply a 1 1/4 to 1 1/2 percent solution with hand-held equipment.
5. **Buckwheat, California / Hasardia / Monkey flower / Tobacco, tree**: For partial control of these species, apply a 3/4 to 1 1/2 percent solution of this product as a foliar spray with hand-held equipment. Thorough coverage of foliage is necessary for best results.
6. **Catsclaw**: For partial control, apply a 1 1/4 to 1 1/2 percent solution with hand-held equipment when at least 50 percent of the new leaves are fully developed.
7. **Cherry, bitter / Cherry, black / Cherry, pin / Oak, southern red / Sweetgum / Prunus**: For control, apply 3 to 7 1/2 pints of this product per acre as a broadcast spray or as a 1 to 1 1/2 percent solution with hand-held equipment.
8. **Coyote brush**: For control, apply a 1 1/4 to 1 1/2 percent solution with hand-held equipment when at least 50 percent of the new leaves are fully developed.

9. **Dogwood / Hickory / Salt cedar:** For partial control, apply a 1 to 2 percent solution of this product with hand-held equipment or 6 to 7 1/2 pints per acre as a broadcast spray.
10. **Eucalyptus, bluegum:** For control of eucalyptus resprouts, apply a 1 1/2 percent solution of this product with hand-held equipment when resprouts are 6 to 12-feet tall. Ensure complete coverage. Apply when plants are actively growing. Avoid application to drought-stressed plants.
11. **Holly, Florida / Waxmyrtle, southern:** For partial control, apply this product as a 1 1/2 percent solution with hand-held equipment.
12. **Kudzu:** For control, apply 6 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Repeat applications will be required to maintain control.
13. **Maple, red:** For control, apply as a 3/4 to 1 1/4 percent solution with hand-held equipment when leaves are fully developed. For partial control, apply 2 to 7 1/2 pints of this product per acre as a broadcast spray.
14. **Maple, sugar / Oak: northern pin / Oak, red:** For control, apply as a 3/4 to 1 1/4 percent solution with hand-held equipment when at least 50 percent of the new leaves are fully developed.
15. **Poison-ivy / Poison-oak:** For control, apply 6 to 7 1/2 pints of this product per acre as a broadcast spray or as a 1 1/2 percent solution with hand-held equipment. Repeat applications may be required to maintain control. Fall treatments must be applied before leaves lose green color.
16. **Rose, multiflora:** For control, apply 3 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment. Treatments should be made prior to leaf deterioration by leaf-feeding insects.
17. **Sage, black / Sagebrush, California / Chamise / Tallowtree, Chinese:** For control of these species, apply a 3/4 percent solution of this product as a foliar spray with hand-held equipment. Thorough coverage of foliage is necessary for best results.
18. **Saltbush, sea myrtle:** For control, apply this product as a 1 percent solution with hand-held equipment.
19. **Willow:** For control, apply 4 1/2 pints of this product per acre as a broadcast spray or as a 3/4 percent solution with hand-held equipment.
20. **Other woody brush and trees listed above:** For partial control, apply 3 to 7 1/2 pints of this product per acre as a broadcast spray or as a 3/4 to 1 1/2 percent solution with hand-held equipment.

Aquatic and other Noncrop Sites

Apply this product as directed and under conditions described to control or partially control weeds and woody plants listed in the "Weeds Controlled" section in industrial, recreational and public areas or other similar aquatic or terrestrial sites on this label.

Noncrop Sites

This product may be used to control the listed weeds in and around aquatic sites and on noncrop sites such as :

Airports
Golf Courses
Habitat Restoration & Management Areas
Highways & Roadsides
Industrial Plant Sites
Lumberyards
Parking Areas
Parks
Petroleum Tank Farms
Pipeline, Power, Telephone & Utility Rights-of-Way
Pumping Installations
Railroads
Schools
Storage Areas
Similar Sites

Aquatic Sites

This product may be applied to emerged weeds in all bodies of fresh and brackish water which may be flowing, nonflowing or transient. This includes 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 which 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 state fish and game agency and water control authorities before applying this product to public water. Permits may be required to treat such water.
- **NOTE:** 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 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 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 applications. This restriction does not apply to intermittent inadvertent overspray of water in terrestrial use sites.
- For treatments after drawdown of water or in dry ditches, allow 7 or more days after treatment before reintroduction of water to achieve maximum weed control. Apply this product within 1 day after drawdown to ensure application to actively growing weeds.
- Floating mats of vegetation may require retreatment. 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.

Forestry Sites and Utility Rights-of-Way

In forest and utility sites, this product is recommended for the control or partial control of woody brush, trees, and annual and perennial herbaceous weeds. This product is also recommended for use in preparing or establishing wildlife openings within these sites, in pine straw plantations for maintaining logging roads, and for side trimming along utility rights-of-way.

In forestry sites, this product is recommended for use in site preparation prior to planting any tree species, including Christmas trees and silvicultural nursery sites.

In utility sites, this product is recommended for use along electrical power, pipeline, and telephone rights-of-way, and in other utility sites associated with these rights-of-way, such as substations.

Application Rates [1]:

Method of Application	Application Rate	Spray Volume (gal/acre)
Broadcast		
Aerial	1.5 to 7.5 qt/acre	5 to 30
Ground	1.5 to 7.5 qt/acre	10 to 60
Spray-to-Wet		
Handgun, Backpack Mistblower	0.75 to 2% by volume	spray-to-wet
Low Volume Directed Spray [11] Handgun, Backpack Mistblower	5% to 10% by volume	partial coverage

[1] Where repeat applications are necessary, do not exceed 8.0 quarts per acre per year.

[11] For low volume directed spray applications, coverage should be uniform with at least 50 percent of the foliage contacted. For best results, coverage of the top one-half of the plant is important.

In forestry site preparation and utility rights-of-way applications, this product requires use with a surfactant such as a non-ionic surfactant containing greater than 80 percent active ingredient. Use of this product without surfactant will result in reduced herbicideperformance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Use higher rates of this product within the recommended rate ranges 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 recommended rate range to control of perennial herbaceous weeds from emergence up to the appearance of seedheads, flowers or berries appear. Use lower rates within the recommended 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 Mixtures

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 on the mixture. Any recommended 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. For side trimming treatments in utility rights-of-way, tank mixtures with Arsenal 2WSL herbicide are not recommended. For side trimming treatments, it is recommended that this product be used alone as recommended, or as a tank mix with Garlon.

Product	Broadcast Rate	Use Sites
Arsenal Applicators Concentrate	2 to 16 fl oz/acre	Forestry site preparation
Oust	1 to 4 oz/acre	Forestry site preparation, utility sites
Garlon 3A [1]	1 to 4 qt/acre	Forestry site preparation, utility sites
Garlon 4	1 to 4 qt/acre	Forestry site preparation, utility sites
Arsenal 2WSL	2 to 32 fl oz/acre	Utility sites
	Spray-to-Wet Rates	
Arsenal Applicators Concentrate	1/32% to 1/2% by volume	Forestry site preparation
Arsenal 2WSL	1/32% to 1/2% by volume	Utility sites
	Low Volume Directed Spray Rates	
Arsenal Applicators Concentrate	1/8% to 1/2% by volume	Forestry site preparation
Arsenal 2WSL	1/8% to 1/2% by volume	Utility sites

[1] Ensure that Garlon 3A is thoroughly mixed with water before adding this product. Agitation is required while mixing this product with Garlon 3A to avoid compatibility problems.

For control of herbaceous weeds, use the lower recommended tank mixture rates. For control of dense stands or difficult-to-control woody brush and trees, use the higher recommended rates.

Forestry Conifer and Hardwood Release

Directed Sprays and Selective Equipment

This product may be applied as a directed spray or by using selective equipment in forestry conifer and hardwood sites, including Christmas tree plantations and silvicultural nurseries. This product requires use with a surfactant. 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. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Tank Mixing: In hardwood plantations, tank mixtures with Oust may be used. In pine plantations, tank mixtures with Garlon 4 or Arsenal AC may be used. Comply with all site restrictions, forestry species limitations, and precautions on the tank mix product labels.

Avoid contact of spray drift, mist or drips with foliage, green bark or non-woody surface roots of desirable plant species. See "Application Equipment and Techniques" section of this label for specific recommendations and precautions.

Spray-to-Wet Applications: Use a 2 percent spray solution to control undesirable woody brush and trees. To control herbaceous weeds, use a 1 to 2 percent spray solution.

Low Volume Directed Spray Applications: Use a 5 to 10 percent spray solution. Coverage should be uniform with at least 50 percent of the foliage contacted. Coverage of the top one-half of the unwanted vegetation is important.

Broadcast Applications: For equipment calibrated for broadcast applications, use 1 1/2 to 7 1/2 quarts of this product per acre. Apply in 10 to 60 gallons of clean water per acre. Shielded application equipment may be used to avoid contact of the spray solution with desirable plants. Shields should be adjusted to prevent spray contact with the foliage of green bark of desirable vegetation.

Wiper Application Equipment: See the "Selective Equipment" section of this label for equipment and application rate recommendations.

Broadcast Application

Note: Except where specifically recommended below, make broadcast applications of this product only where conifers have been established for more than one year.

Broadcast application must be made after formation of final conifer resting buds in the fall or prior to initial bud swelling in the spring.

Injury may occur to conifers treated for release, especially where spray patterns overlap or the higher rates are applied. Damage can be accentuated if applications are made when conifers are actively growing, or are under stress from drought, flood water, improper planting, insects, animal damage or diseases.

This product requires use with a surfactant. Use a surfactant that is labeled/recommended for use in over-the-top release applications. Use of this product without a surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

For release of the following conifer species outside the Southeastern United States:

Douglas fir (*Pseudotsuga menziesii*)
Fir (*Abies* species)
Hemlock [11] (*Tsuga* species)
Pines [1] (*Pinus* species)
Redwood, California [11] (*Sequoia* species)

[1] Includes all species except loblolly pine, longleaf pine, shortleaf pine or slash pine.

[11] Use of a surfactant is not recommended for release of hemlock species or California redwood. In mixed conifer stands, injury to these species may result if a surfactant is used.

Application Rate for Conifer Release: Apply 3/4 to 1 1/2 quarts per acre as a broadcast spray. In Maine and New Hampshire, up to 2 1/4 quarts per acre of this product may be used for the control and suppression of difficult-to-control hardwood species.

To release Douglas fir, and pine and spruce species at the end of the first growing season (except in California), apply 3/4 to 1 1/8 quarts per acre of this product. Make sure that all conifers are well hardened off.

Note: For release of Douglas fir with this product or recommended tank mixtures, a nonionic surfactant recommended for over-the-top foliar spray may be used. To avoid possible conifer injury, nonionic surfactants may be used at 2 fluid ounces per acre at elevations above 1500 feet, or 1 fluid ounce per acre in the coastal range or at elevations below 1500 feet. Use of surfactant rates exceeding those listed above may result in unacceptable conifer injury and are not recommended. Make sure that the nonionic surfactant has been adequately tested for safety to Douglas fir before use.

Tank Mixtures with Oust: To release jack pine, white pine and white spruce, apply 3/4 to 1 1/2 quarts of this product with 1 to 3 ounces (1 to 1 1/2 ounces for white pine) of Oust per acre. Make applications to actively growing weeds as a broadcast spray over the top of established conifers. Applications at these rates should be made after formation of conifer resting buds in the late summer or fall.

Tank Mixtures with Arsenal Applicators Concentrate: This product may be tank mixed with Arsenal Applicators Concentrate for release of Douglas fir. Tank mix 3/4 to 1 1/8 quarts of this product with 2 to 6 fluid ounces of Arsenal Applicators Concentrate per acre. For release of balsam fir and red spruce, apply a mixture of 1 1/2 quarts of this product with 1 to 2 1/2 fluid ounces of Arsenal Applicators Concentrate per acre.

In Maine and New Hampshire 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, up to 2 1/4 quarts per acre of this product may be tank mixed with 1 to 2 1/2 fluid ounces per acre of Arsenal Applicators Concentrate herbicide and applied as a broadcast spray.

Tank mixtures with Arsenal Applicators Concentrate and Oust or Oust XP Herbicides: 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 weed densities, tough-to-control brush and where maples make up a large component of the undesirable trees up to 2 1/4 quarts per acre of this product may be tank mixed with 1 to 2.5 fluid ounces per acre of Arsenal Applicators Concentrate and 1 to 3 oz of Oust or Oust XP herbicides and applied as a broadcast spray.

For release of the following conifer species in the Southeastern United States:

Loblolly pine (*Pinus taeda*)
Eastern white pine (*Pinus strobus*)
Shortleaf pine (*Pinus echinata*)
Slash pine (*Pinus elliottii*)
Virginia pine (*Pinus virginiana*)
Longleaf pine (*Pinus palustris*)

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 recommended tank mixture.

Tank Mixtures with Arsenal Applicators Concentrate: For conifer release, apply 3/4 to 1 1/2 quarts of this product with 2 to 16 fluid ounces 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 recommended rates for dense tough-to-control wood brush and trees.

Read and observe label claims, cautionary statements and all information on the labels of each product used in these tank mixtures. Use according to the most restrictive precautionary statements for each product in the mixture.

Herbaceous Release

When applied as directed, this product plus listed residual herbicides provides 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.

Tank Mixtures with Oust: To release loblolly pines, tank mix 12 to 18 fluid ounces of this product with 2 to 4 ounces of Oust per acre.

To release slash pines, tank mix 9 to 12 fluid ounces of this product with 2 to 4 ounces of Oust per acre.

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 per acre of this product may be tank mixed with 1 to 3 oz of Oust herbicide or Oust XP herbicide to control grass, herbaceous weeds and woody brush, and applied as a broadcast spray.

For tank mixtures with Oust use a surfactant that is labeled/ recommended for use in over-the-top herbaceous release applications. Use of this product without a surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Weed control may be reduced if water volumes exceed 25 gallons per acre for these treatments.

Tank Mixture with Atrazine: To release Douglas fir, apply 3/4 quart of this product with 4 pounds a.i. of atrazine per acre. 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 mixture.

Always read and follow the manufacturer's label for all herbicides and surfactants used.

Wetland Sites

This product may be used in and around water (aquatic areas) and wetlands found in forestry and in power, telephone and pipeline rights-of-way sites, including where these sites are adjacent to or surrounding domestic water supply reservoirs, supply streams, lakes and ponds. Read and observe the following before making applications in and around water.

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

There is no restriction on the use of treated water for irrigation, recreation or domestic purposes.

Note: Do not apply this product directly to water within 1/2 mile up-stream 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 for a minimum period of 48 hours after application. 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. 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. The maximum application rate of 3 3/4 quarts per acre must not be exceeded in a single over-water broadcast application except as follows, where any recommended rate may be applied:

- Stream crossings in utility right-of-way.
- Where applications will result in less than 20 percent of the total water area being treated.

Wildlife Habitat Restoration and Management Areas

This product is recommended for the restoration and/or maintenance of native habitat and in wildlife management areas.

Habitat Restoration and Maintenance: When applied as directed, exotic and other undesirable vegetation may be controlled in habitat management areas. Applications may be made to allow recovery of native plant species, to open up water to attract waterfowl, and for similar broad-spectrum vegetation control requirements in habitat management areas. Spot treatments may be made to selectively remove unwanted plants for habitat enhancement. For spot treatments, care should be exercised to keep spray off of desirable plants.

Wildlife Food Plots: This product may be used as a site preparation treatment prior to planting wildlife food plots. Apply as directed to control vegetation in the plot area. Any wildlife food species may be planted after applying this product, or native species may be allowed to reinfest the area. If tillage is needed to prepare a seedbed, wait 7 days after applying this product before tilling to allow for maximum effectiveness.

Wiper Applications

For wick or wiper applications, mix 1 gallon of this product with 2 gallons of clean water to make a 33 percent solution. Addition of a nonionic surfactant at a rate of 10 percent by volume of total herbicide solution is recommended.

Wiper applications can be used to control or suppress annual and perennial weeds listed on this label. In heavy weed stands, a double application in opposite directions may improve results. See the "Weed Controlled" section in this label for recommended timing, growth stage and other instructions for achieving optimum results

Cut Stump Application

Woody vegetation may be controlled by treating freshly cut stumps of trees and resprouts with this product. Apply this product using suitable equipment to ensure coverage of the entire cambium. Cut vegetation close to the soil surface. **Apply a 50 to 100 percent solution of this product to freshly cut surface immediately after cutting.** Delay in applying this product may result in reduced performance. For best results, trees should be cut 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.*
Coyote brush [1]	*Baccharis consanguinea*
Dogwood [1]	*Cornus spp.*
Eucalyptus	*Eucalyptus spp.*
Hickory [1]	*Carya spp.*
Madrone	*Arbutus menziesii*
Maple [1]	*Acer spp.*
Oak	*Quercus spp.*
Poplar [1]	*Populus spp.*
Reed, giant	*Arundo donax*
Salt cedar	*Tamarix spp.*
Sweet gum [1]	*Liquidambar styraciflua*
Sycamore [1]	*Platanus occidentalis*
Tan oak	*Lithocarpus densiflorus*
Willow	*Salix spp.*

[1] This product is not approved for this use on these species in the state of California.

Injection and Frill Applications

Woody vegetation may be controlled by injection or frill application of this product. Apply this product using suitable equipment which must penetrate into living tissue. Apply the equivalent of 1 ml of this product per 2 to 3 inches of trunk diameter. This is best achieved by applying 25 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 dilute material to a continuous frill or more closely spaced cuttings. Avoid application techniques that allow runoff to occur from frill or cut areas in species that exude sap freely after frills or cutting. In species such as these, make frill or cut at an oblique angle so as to produce a cupping effect and use undiluted material. For best results, applications should be made during periods of active growth and full leaf expansion.

This treatment will control the following woody species:

Common Name	Scientific Name
Oak	*Quercus spp.*
Poplar	*Populus spp.*
Sweet gum	*Liquidambar styraciflua*
Sycamore	*Platanus occidentalis*

This treatment will suppress the following woody species:

Common Name	Scientific Name
Black gum [1]	*Nyssa sylvatica*
Dogwood	*Cornus spp.*
Hickory	*Carya spp.*
Maple, red	*Acer rubrum*

[1] This product is not approved for this use on this species in the state of California.

Release of Bermudagrass or Bahiagrass on Noncrop Sites

Release Of Dormant Bermudagrass And Bahiagrass

When applied as directed, this product will provide control or suppression of many winter annual weeds and tall fescue for effective release of dormant bermudagrass or bahiagrass. Make applications to dormant bermudagrass or bahiagrass.

For best results on winter annuals, treat when weeds are in an early growth stage (below 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.

Weeds Controlled

Rate recommendations for control or suppression of winter annuals and tall fescue are listed below.

Apply the recommended rates of this product in 10 to 25 gallons of water per acre plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Weeds Controlled or Suppressed [1]

Note: C = Controlled; S = Suppressed

	Rate (Fluid Ounces Per Acre)					
Weed Species	**6**	**9**	**12**	**18**	**24**	**48**
Barley, little *Hordeum pusillum*	S	C	C	C	C	C
Bedstraw, catchweed *Galium aparine*	S	C	C	C	C	C
Bluegrass, annual *Poa annua*	S	C	C	C	C	C
Chervil *Chaerophyllum tainturieri*	S	C	C	C	C	C
Chickweed, common *Stellaria media*	S	C	C	C	C	
Clover, crimson *Trifolium incarnatum*	•	S	S	C	C	C
Clover, large hop *Trifolium campestre*	•	S	S	C	C	C
Speedwell, corn *Veronica arvensis*	S	C	C	C	C	C
Fescue, tall *Festuca arundinacea*	•	•	•	•	S	S
Geranium, Carolina *Geranium carolinianum*	•	•	S	S	C	C
Henbit *Lamium amplexicaule*	•	S	C	C	C	C
Ryegrass, Italian *Lolium multiflorum*	•	•	S	C	C	C
Vetch, common *Vicia sativa*	•	•	S	C	C	C

[1] These rates apply only to sites where an established competitive turf is present.

Release Of Actively Growing Bermudagrass

NOTE: Use only on sites where bahiagrass or bermudagrass are desired for ground cover and some temporary injury or yellowing of the grasses can be tolerated.

When applied as directed, this product will aid in the release of bermudagrass by providing control of annual species listed in the "Weeds Controlled" section in this label, and suppression or partial control of certain perennial weeds.

For control or suppression of those annual species listed in this label, use 3/4 to 2 1/4 pints of this product as a broadcast spray in 10 to 25 gallons of spray solution per acre, plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. Use the lower rate when treating annual weeds below 6 inches in height (or length of runner in annual vines). Use the higher rate as size of plants increases or as they approach flower or seedhead formation.

Use the higher rate for partial control or longer-term suppression of the following perennial species. Use lower rates for shorter-term suppression of growth.

Bahiagrass	Johnsongrass [1]
Dallisgrass	Trumpetcreeper [11]
Fescue (tall)	Vaseygrass

[1] Johnsongrass is controlled at the higher rate.
[11] Suppression at the higher rate only.

Use only on well-established bermudagrass. Bermudagrass injury may result from the treatment but regrowth will occur under moist conditions. Repeat applications in the same season are not recommended, since severe injury may result.

Bahiagrass Seedhead and Vegetative Suppression

When applied as directed in the "Noncrop Sites" section in this label, this product will provide significant inhibition of seedhead emergence and will suppress vegetative growth for a period of approximately 45 days with single applications and approximately 120 days with sequential applications.

Apply this product 1 to 2 weeks after full green-up of bahiagrass or after the bahiagrass has been mowed to a uniform height of 3 to 4 inches. Applications must be made prior to seedhead emergence. Apply 5 fluid ounces per acre of this product in 10 to 25 gallons of water per acre, plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information.

Sequential applications of this product plus nonionic surfactant may be made at approximately 45-day intervals to extend the period of seedhead and vegetative growth suppression. For continued vegetative growth suppression, sequential applications must be made prior to seedhead emergence.

Apply no more than 2 sequential applications per year. As a first sequential application, apply 3 fluid ounces of this product per acre plus nonionic surfactant. A second sequential application of 2 to 3 fluid ounces per acre plus nonionic surfactant may be made approximately 45 days after the last application.

Annual Grass Growth Suppression

For growth suppression of some annual grasses, such as annual ryegrass, wild barley and wild oats growing in coarse turf on roadsides or other industrial areas, apply 3 to 4 ounces of this product in 10 to 40 gallons of water per acre plus a surfactant such as a non-ionic surfactant containing 80% or greater active ingredient.. Use of this product without surfactant will result in reduced herbicide performance. Refer to the "Mixing and Application Instructions" section of this label and the surfactant manufacturer label for more information. . Applications should be made when annual grasses are actively growing and before the seedheads are in the boot stage of development. Treatments made after seedhead emergence may cause injury to the desired grasses.

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Revisions:

1. Updated Storage and Disposal

APPENDIX 8

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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APPENDIX 9

NATIONAL GRID ENVIRONMENTAL POLICY

National Grid and the environment

We, at National Grid, will be the foremost international electricity and gas company, delivering unparalleled safety, reliability and efficiency, vital to the wellbeing of our customers and communities.

We are committed to being an innovative leader in energy management and to safeguarding our global environment for future generations.

Investing in, and operating a safe, and reliable gas and electricity supply network uses energy and raw materials, and produces waste. Our effect on the environment and the communities we serve depends on how we and our supply chain work.

We will face these challenges by deploying best practice throughout our operations, by engaging on national and international energy issues and by supporting renewable energy targets. We will show leadership by working with others to deliver a more sustainable future.

We are committed to:

- reducing the effect our activities have on the environment by considering whole life environmental costs and benefits in our business decisions
- using resources efficiently through good design, using sustainable materials, responsibly refurbishing existing assets, and reducing and recycling waste
- reducing the effect our business has on climate change by decreasing our emissions of greenhouse gases by 45% by 2020 and by 80% by 2050
- respecting the environmental status and biodiversity of the places we work, aiming to enhance areas for the benefit of local communities or the natural environment
- managing the risks associated with sites where we have responsibility for dealing with contamination associated with past operations
- helping consumers reduce their dependency on fossil fuels by giving them access to more sustainable energy and through innovative energy efficiency programs
- working with governments and regulators to help them develop and deliver more effective environmental polices and targets
- continually improving our management systems to prevent pollution, reduce the risk of environmental incidents, and comply with environmental laws, policies, charters and other commitments to which we subscribe
- making sure that our employees have the training, skills, knowledge and resources they need to meet our environmental commitments
- openly sharing our performance with employees, members of the public and others, and giving them the opportunity to comment on our performance
- requiring those working on our behalf to demonstrate at least the same level of commitment to the environment and creating a culture where best practice can be shared.

Steve Holliday Chief Executive

nationalgrid

The power of action.

April 2009