

|             | 1 |
|-------------|---|
| THE CO ESTA |   |
| A Green     |   |
| Contractor  |   |

U.S. Environmental Protection Agency Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

Date of Issuance: EPA Reg. Number: 1-24-08

228-561

Term of Issuance: Conditional

Name of Pesticide Product:

NUP-06096 IVM Herbicide

NOTICE OF PESTICIDE:

X Registration \_\_ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Nufarm Americas Inc. 150 Harvester Drive Burr Ridge, IL 60527

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is registered in accordance with FIFRA section 3(c)(7)(A) provided you agree in writing to:

- 1. Change the EPA Registration Number from 228-LAR to 228-561.
- 2. Add an appropriate EPA Establishment Number to the label.
- 3. Add appropriate Net Contents information to the label.
- 4. Submit the outstanding data requirements 830.6317 Storage Stability and 830.6320 Corrosion Characteristics within one year from the date of this letter.
- 5. Add "exist" after "washables" in the statement "If no such instructions for washables, use detergent and hot water" on page 2.

Signature of Approving Official:

1-24.08

Erik Kraft, Acting Product Manager (23)

Herbicide Branch, Registration Division (7505P)

- 2/13
- 6. On page 4, revise "1/2 to 2 gallons per acre" to "1-4 quarts" in the statement "For broadleaf control, use this product at rates of ½ to 2 gallons per acre" under APPLICATION RATE RANGES
- 7. On page 5, revise "recommendations" to "directions" in the third paragraph.
- 8. On page 5, revise "downward" to "downwind" in the subsection Swath Adjustment
- 9. On page 7, revise "rqgweed" to "ragweed"
- 10. A Picloram Stewardship Program is required to maintain registration of all end use products containing the active ingredient picloram. The program requires that you include the following Picloram Stewardship Program language on your product's label:
  - a. "Every 2 years starting January 1, 2008, Nufarm Americas Inc. will offer training to applicators which will cover application techniques and product stewardship particular to their use(s) of this product (NUP-06095 IVM, Registration Number 228-561). Applicators of this product must be able to provide certification of such training on demand to the State, Tribal, or Federal enforcement agent."
  - b. In addition to the required above language on the label, the Stewardship Program must comprise of the following elements:
    - i. Qualified Personnel.
      - 1. The registrant must employ and upon request demonstrate to the satisfaction of the Agency, that it possesses and continues to possess during the term of its picloram end-use registrations, qualified personnel with appropriate scientific and technical expertise to provide the support and training for the Registrant's picloram end-use products.
      - 2. Specifically, for so long as the registrant has active end-use picloram registrations, the Registrant shall retain qualified personnel with expertise in appropriate science fields such as field biology, environmental fate, soil science, toxicology, etc for each use pattern for which the registrant's end-use picloram products are labeled. Personnel qualification must be demonstrated by the possession of appropriate college or graduate credits in the appropriate science fields from a school accredited by accrediting agencies recognized by the United States Department of Education. If the personnel received a degree outside the United States, it must come from an institution with an accreditation equivalent to that of the United States.

#### ii. Training

1. The Registrant shall provide picloram-specific application training at least every two years to all applicators that apply one or more of Registrant's picloram end-use products. Such training shall include (1) how to identify appropriate picloram application locations, (2) appropriate application techniques, (3) techniques for reducing application rates in sensitive areas, (4) using Individual Plant Treatments (IPTs), (5) how to avoid product spills, (6) promoting product knowledge and stewardship, and (7) appropriate container management programs. Following successful completion of training, Registrant shall certify each such commercial applicator to apply Registrant's end-use picloram products as identified by the EPA Registration number. Registrant shall only have to provide four hours of training to a particular applicator once every two years even if such Approved Picloram Applicator applies more than one of Registrant's end-use picloram products.

Ci (1) 1-24-08

- 2. The Registrant's certification will consist at a minimum of the applicator's name, the name of the Company providing the training, and the registration number(s) of the registrant's picloram products for which the applicator has received training. All picloram end use products, except those containing 5.4 percent picloram for use on cut stems only, will be restricted use products and subject to these conditions of registration.
- iii. Technical Support and Education for Land Managers and Extension Educators.
  - 1. The Registrant shall maintain and provide adequate resources and technical support in connection with the picloram end-use products to land managers, government officials and extension educators. Upon request, the Registrant must make available and readily accessible to land managers, government officials and extension educators, analysis and data interpretation of picloram in soil, water and other matrices of interest such as compost and plant and animal tissues for a minimum of 100 samples per calendar year.
- iv. Books and Records, Annual Reporting
  - 1. Upon the effective date of registration or amended registration, the registrant shall maintain accurate, up-to-date books and records of its required activities under these Conditions of Registration which shall include:
    - a. Names of personnel stewarding picloram and their qualifications along with the training material offered.
    - b. Picloram Retail Locations, training dates and number of people attending the training and the names of those individuals who were trained and the EPA Registration Number of the products they were trained to use.
    - c. Registrant agrees to provide EPA, States and Tribes with said records within 30 days upon request. Records must be kept for three years.
  - 2. On or before January 31 of each year after the Effective Date, starting in 2008 and continuing for five (5) years, registrant shall submit to EPA an annual report for the preceding calendar year describing Registrant's end-use picloram product stewardship activities including:
    - a. a list of all the Registrant's picloram retail locations and any locations where an employee has trained and certified during the preceding calendar year;
    - b. a list of all Registrant's Approved Picloram Applicators including those who were applicator trained and certified during the preceding calendar year;
  - 3. After the above reporting period, reports will be submitted when requested.
  - 4. All books, records, and reports maintained and/or furnished in connection with these Conditions of Registration to EPA will be available to the public and cannot be claimed as confidential business information or trade secrets.

Ch' Lx 1-261-03

Page 4 EPA Reg. No.228-561 4/3

The basic formulation CSF [dated 7/13/2007] of the product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. The basic CSF will be added to your file.

You will submit and/or cite all data required for the registration of this product when the Agency requires all registrants of similar products to submit data. You will submit one (1) copy of your final printed labeling incorporating the above changes before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). A stamped copy of labeling is enclosed for your records. If you have any questions, please contact Hope Johnson at 703-305-5410.

Erik Kraft

Acting Product Manager (23)

Ca 7-29:08

Herbicide Branch

Registration Division (7505P)

#### RESTRICTED USE PESTICIDE

May Injure (Phytotoxic) Susceptible, Non-Target Plants. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification. Commercial certified applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

# NUP-06095 IVM HERBICIDE

A weed and brush herbicide for control of unwanted annual and perennial broadleaf weeds, woody plants and vines on forest planting sites and non-crop areas including industrial, manufacturing, and storage sites, rights-of way, such as electrical power lines, communication lines, pipelines, highways, railroads, and wildlife openings in forest and non-crop areas.

| Picloram: 4-amino-3,5,6-trichloropicolinic acid, triisopropanolamine salt* | 10.2%  |
|--|--------|
| 2,4-dichlorophenoxyacetic acid, triisopropanolamine salt**                 | 39.6%  |
| OTHER INGREDIENTS:   | 50.2%  |
| TOTAL:   | 100.0% |
|  |        |

Acid equivalents:

**ACTIVE INGREDIENTS:** 

\*Picloram: 4-amino-3,5,6-trichloropicolinic acid 5.7%, 0.54 lb/gal \*\*2,4-dichlorophenoxyacetic acid 21.2%, 2.00 lb/gal

## WARNING - AVISO

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.)

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300 For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 228-LAR EPA EST. NO.

MANUFACTURED BY NUFARM AMERICAS INC. 150 HARVESTER DRIVE BURR RIDGE, IL 60527



**NET CONTENTS:** 

ACCEPTED with COMMENTS in EPA Letter Dated

JAN 24 2008

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

228-56

00228-00000.2080123.EPA.Pending NUP-06095IVM

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING - AVISO

Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Prolonged or frequent repeated skin contact may cause allergic reactions in some individuals.

#### 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 C on an EPA chemical resistance category selections chart.

#### All mixers, loaders, applicators, flaggers and other handlers must wear:

- · Long-sleeved shirt and long pants
- Chemical resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride (PVC), or Viton
- · Shoes plus socks
- Protective eyewear
- · Chemical resistant apron must be worn when mixing or loading, cleaning up spills or otherwise exposed to the concentrate

For containers of over 1 gallon, but less than 5 gallons: Mixers and loaders who do not use a mechanical system (such as probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to other required

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

#### **Engineering Controls**

For containers of 5 gallons or more: Do not open pour product from this container. A mechanical system (such as probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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

#### **USER SAFETY RECOMMENDATIONS**

#### Users Should:

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

| FIRST AID           |  |  |
|---------------------|--|--|
| IF IN EYES          | <ul> <li>Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>   |  |
| IF SWALLOWED        | <ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul> |  |
| IF INHALED          | <ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>  |  |
| •                   | HOT LINE NUMBER  ntainer or label with you when calling a poison control center or doctor, or going for treatment. t 1-877-325-1840 for emergency medical treatment information.   |  |
| Probable mucosal da | NOTE TO PHYSICIAN amage may contraindicate the use of gastric lavage.  |  |

#### **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic invertebrates. This pesticide is toxic to some plants at very low concentrations. Non-target plants may be adversely affected if pesticide is allowed to drift from areas of application. 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 disposing of equipment washwaters or rinsate. Do not contaminate water used for irrigation or domestic purposes by cleaning of equipment or disposal of wastes. Do not allow run-off or spray to contaminate wells, irrigation ditches, or any body of water used for irrigation or domestic purposes. Do not make application when circumstances favor movement from treatment site. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Application around cistern or well may result in contamination of drinking water or ground water.

Picloram is known to leach through soil into ground water under certain conditions as a result of agricultural use. 2,4-D has properties and characteristics associated with chemicals detected in groundwater. Use of these chemicals in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

Picloram can contaminate surface water through spray drift. Under some conditions, picloram may also have a high potential for runoff into surface water (primarily via dissolution in runoff water) for several months post-application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas over-laying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

#### PHYSICAL AND CHEMICAL HAZARDS

Combustible - Do not use or store near heat or open flame.

Notice: Read the entire label. Use only according to label directions.

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 through any type of irrigation system.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 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, such as polyvinyl chloride, nitrile rubber, or butyl rubber, and protective eyewear.

#### **NON-AGRICULTURAL USE REQUIREMENTS**

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

Entry Restrictions for Non-WPS Uses: Do not enter or allow people or pets to enter the treated area until sprays have dried.

#### **GENERAL INFORMATION**

This product is a water-soluble liquid product containing picloram and 2,4-D. Use this product in forest planting sites and non-crop area including industrial manufacturing and storage sites, rights-of-way, such as electrical power lines, communication lines, pipelines, highways, railroads, and wildlife openings in forest and non-crop areas to selectively control many unwanted annual and perennial broadleaf weeds, woody species and vines listed on this label.

Herbicidal effects of this product occur primarily from uptake by plant foliage and translocation throughout the plant, however, secondary herbicidal activity may occur from soil uptake of picloram. Very small amounts can kill or damage broadleaf plants. To prevent damage to crops and other desirable plants, carefully follow all directions and precautions.

#### PRECAUTIONS AND RESTRICTIONS

Be sure that use of this product conforms to all applicable regulations: Observe any special use and application restrictions and limitations, including method of application and permissible areas of use as required by state or local regulations. When used in tank mix combination with other products, follow all applicable use directions, precautions, restrictions, and limitations on the labels of each product used.

#### Maximum Use Rates:

Total amount used of this product must not exceed 8 quarts per acre per annual growing season on rights-of-way and other non-crop areas

Total amount used of this product must not exceed 8 quarts per acre within a period of 2 annual growing seasons on forest sites.

Maximum rate of 4 quarts (2 lbs 2,4-D active ingredient) per application, with a maximum of 2 applications per year for non-crop annual and perennial weeds. Minimum of 30 days between applications.

Maximum rate of 8 quarts (4 lbs 2,4-D active ingredient) per application, maximum 1 application per year for non-crop woody plants and forestry uses.

#### **Application Rate Ranges:**

For broadleaf weed control, use this product at rates of 1/2 to 2 gallons per acre.

For woody plants and vines control, use this product at rates between 1 to 2 gallons per acre.

For mixed woody plants and vines control, this product may be tank mixed with Tahoe 3A or Tahoe 4E (triclopyr herbicides), or 4 lb./gal. 2,4-D low-volatile esters registered for sites listed on this label. When tank mixing, observe all precautions, directions, and limitations on both products' labeling. In all cases use the amounts specified in enough water to give thorough and uniform coverage of the plants to be controlled.

NOTE: This product does not mix readily with oil. Use of a non-ionic agricultural surfactant, such as Ortho X-77, Triton AG-98, or Tronic, is recommended for all applications. When using surfactants, follow the use directions and precautions listed on the surfactant manufacturer's label. Use the higher recommended concentrations of surfactant in the spray mixture when applying lower spray volumes per acre.

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

Do not make application when circumstances favor movement from treatment site.

Do not rotate crops intended for food or feed use on treated land if they are not registered for use with picloram until an adequately sensitive bioassay or chemical test shows that soil residues of picloram are no longer detectable.

On areas treated with this product, do not rotate to crops intended for food or feed use, other than grasses, rye, forage sorghum, sudangrass, wheat, barley or oats not underseeded with a legume.

Do not mix with dry fertilizer.

Do not use on sub-irrigated land.

Do not move treated soil, or use treated soil for growing other plants until soil residues of picloram are no longer detectable as indicated by an adequately sensitive bioassay or chemical test.

Do not spray if the injury to existing legumes cannot be tolerated. This product may injure or kill legume plants. New seeding of legumes may not be successful if made within two years following application of this product.

Grazing Restrictions: There are no grazing restrictions for non-lactating dairy animals or other livestock including horses, sheep, goats and other animals in the treatment area. Do not allow lactating dairy animals to graze treated areas within 7 days after application. Do not harvest grass cut for hay from treated areas for 30 days after application. Meat animals must be withdrawn from treated forage at least 3 days before slaughter.

Do not transfer livestock from treated grazing areas to broadleaf crop areas without first allowing 7 days of grazing on an untreated grass pasture. Otherwise, urine may contain enough picloram to cause injury to sensitive broadleaf plants.

Do not use manure from animals grazing treated areas on land used for growing broadleaf crops, ornamentals, orchards, or other susceptible, desirable plants. Manure may contain enough picloram to cause injury to susceptible plants.

Do not use plant material from treated areas for composting or mulching of susceptible broadleaf plants.

Do not contaminate water intended for irrigation or domestic purposes. To avoid injury to crops or other desirable plants, do not treat or allow spray drift or run-off to fall onto banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes. Do not apply to snow or frozen ground.

Do not apply or otherwise permit this product or sprays containing this product to contact crops or other desirable broadleaf plants including, but not limited to alfalfa, beans, cotton, grapes, melons, peas, potatoes, safflower, soybeans, sugar beets, sunflower, tobacco, tomatoes, and other vegetable crops, flowers, fruit plants, ornamentals and shade trees.

Do not apply this product on residential or commercial lawns or near ornamental trees and shrubs. Untreated trees can occasionally be affected by root uptake or herbicide through movement into the top soil or by excretion of the product from the roots of nearby treated trees. Do not apply this product within the root zone of desirable trees unless such injury can be tolerated.

Avoid injury to newly planted conifers. Conifer planting intervals vary. Pines planted sooner than 6 months after treatment with this product may be injured in the south or west of the Cascade Mountains. Other conifers, west of the Cascade Mountains, may be injured if planted sooner than 8 to 9 months after treatment. For all conifers, the waiting period treatment and planting should be 11 to 12 months in the are between the Cascade and Rocky Mountains and 8 to 9 months in the Great Lake States and the Northeastern United States

#### Avoid injurious spray drift:

Applications should be made to avoid spray drift because very small quantities of the spray that may not be visible may severely injure susceptible crops during both growing and dormant periods. To minimize spray drift:

- 1. Use nozzle pressures no greater than are required to obtain a proper spray pattern for adequate coverage of target plants.
- 2. Apply as a coarse spray.
- 3. Use nozzles designed for herbicide application that do not produce a fine droplet spray.
- 4. Spray when wind velocity is low. Follow local state regulations. Avoid application under conditions which are conducive to air inversions or conditions of atmospheric temperature inversion.

When making applications near susceptible crops, spray drift may be further lessened by using a drift control system such as Microfoil, Thru-Valve boom (or equivalent) or a drift control agent such as Nalco-Trol (or equivalent). If a drift control additive is used, follow all use recommendations and precautions on the product label.

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.

Avoid spray drift via Ground Equipment: With ground equipment, spray drift may be lessened by thickening (higher viscosity) spray mixtures by adding a drift control additive as directed by the manufacturer; by keeping the spray boom as low as possible; by keeping the operating spray pressures at the manufacturers recommended minimum pressures for the specific nozzle types used (low pressure nozzles are available from spray equipment manufacturers). In hand-gun applications such as high volume leaf-stem treatment, spray drift may be minimized by selecting the minimum pressure that will provide adequate coverage (without forming a mist); by spraying no higher than brush tops. Do not apply this product with a mistblower.

Avoid spray drift via Aerial Application: Avoid spray drift at the application site. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. Users are responsible for considering all these factors when making decisions.

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

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

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

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

[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 downward. 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. The presence of inversions 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).

Determine Air Movement and Direction Before Making Foliar Applications: Do not spray when wind is blowing toward susceptible crops or ornamental plants 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 movements, lapse conditions, or temperature inversions (stable air). If the smoke layers or otherwise indicates a potential for hazardous spray drift, do not spray.

| Annual/Perennial Weed Species  |   | Annual/Perennial Weed Species Woody Plants and Vines |  |   |   |
|--|---|--|--|---|---|
| bindweed, field<br>bouncingbet<br>carrot, wild<br>chicory<br>clover<br>dandelion<br>dock<br>fleabane<br>goldenrod<br>horsenettle | knapweed milkweed plantain prickly lettuce ragweed ragwort, tansy rush skeleton weed sowthistle spurge, leafy starthistle, yellow | thistles<br>toadflax<br>vetch                        | ailanthus alder aspen birch blackberry bracken fern buttonbrush cherry Douglas fir | fir, balsam<br>gorse<br>gum<br>hemlock<br>hickory<br>honeysuckle<br>kudzu<br>locust<br>maple<br>oak | persimmor<br>pine<br>poison oak<br>sassafras<br>sourwood<br>spruce<br>sumac<br>tulip popla<br>wild rose<br>willow |

#### SPECIFIC USE DIRECTIONS

| High Volume Leaf-Stem Treatment   |  |  |
|---|--|--|
| Specific Use Directions   |  |  |
| Apply this product at a rate of 4 quarts in water to make 100 gallons of spray. Apply spray mixture in a manner which thoroughly wets all leaves, stems, and roo collars. |  |  |
| Mix 1 to 2 quarts of product with:  |  |  |
| 1 to 4 quarts of Tahoe® 3A (triclopyr herbicide) OR 1 to 3 quarts of Tahoe® 4E (triclopyr herbicide) OR 4 lb/gal 2,4-D low-volatile ester                                 |  |  |
| AND dilute to make 100 gallons of spray.  |  |  |
| Apply after the foliage is well developed and in a manner to give thorough spray coverage.  |  |  |
| Apply spray mixture in a manner which thoroughly wets all leaves, stems, and recollars.   |  |  |
| Apply spray mixture in a manner which thoroughly wets all leaves, stems, root collars an soil around the root collars.  |  |  |
|   |  |  |

The amount of spray mixture applied per acre wil vary with plant size and density. Do not allow the spray, even as minute amounts of spray drift, to contact desireable broadleaf plants, and do not wet the soil over roots of such plants.

NOTE: The total use of this product must not exceed 8 quarts per acre.

| Modified High Volume Leaf-Stem Treatment       |   |  |  |
|--|---|--|--|
| Specific Application                           | Specific Use Directions   |  |  |
| For woody brush                                | Apply this product at a rate of 2 to 4 quarts in water to make 100 gallons of spray. Apply spray mixture in a manner which thoroughly wets all leaves, stems, and root collars. |  |  |
| For controlling a wider range of plant species | t Mix 2 to 4 quarts of product with:  |  |  |
|  | 1 to 4 quarts of Tahoe® 3A (triclopyr herbicide) or 1 to 3 quarts of Tahoe® 4E (triclopyr herbicide)  |  |  |
|  | and dilute to make 100 gallons of spray.  |  |  |
|  | Apply after the foliage is well developed and in a manner to give thorough spray coverage.  |  |  |

The amount of spray mixture applied per acre wil vary with plant size and density. Use a total amount of spray mixture applied per acre is 40 to 60 gailons. **NOTE**: The total use of this product must not exceed 8 quarts per acre.

#### **Broadcast Ground or Aerial Foliage Treatments**

#### For Ground Applications:

In order to obtain adequate plant coverage, apply this product in 15 or more gallons of total spray mixture per acre.

#### For Aerial Applications:

In order to obtain adequate plant coverage, apply this product in 5 to 20 gallons of total spray mixture per acre.

Use higher spray volumes where plants are tall, where the vegetation to be treated is dense, or where difficult to control species are present.

| present.  |  |
|---|--|
| Specific Application  | Specific Use Directions  |
| For broadleaf annual and perennial weeds and woody vine control   | Apply this product at a rate of 2 to 4 quarts per acre for non-cropland and 2 to 8 quarts per acre for forestry in a water spray mixture.  Apply to problem weeds and vines any time after growth begins in the spring and late in summer or fall.   |
| For seasonal control of vigorously growing stands of field bindweed, Canada thistle, or mixtures of these with susceptible annual weeds such as rqgweed, dandelion, plantain, clovers, and dock | Mix 2 to 3 quarts of this product per acre in water spray.   |
| In arid areas and for control of more resistant perennial weeds   | Apply this product at a rate of 4 to 8 quarts per acre for forestry uses and at a rate of up to 4 quarts for non-cropland use. Use 4 to 6 quarts per acre to control species such as Canada thistle, field bindweed, and milkweed for forestry uses. Use up to 4 quarts for non-cropland use. The higher rates should be used under drought stress conditions and for the more resistant species such as bouncingbet, leafy spurge, toadflax, and woody vines.  The spectrum of activity can be improved by tank mixing 2 to 4 quarts of this product with 1.33 to 4 quarts of Tahoe® 3A (triclopyr herbicide) or 1 to 3 quarts of Tahoe® 4E (triclopyr herbicide) per acre. |
| For woody plant control   | Apply this product at a rate of 4 to 8 quarts per acre in water spray mixture.   |
| For susceptible seedling stages of species such as aspen, cherry, and sumac   | Apply this product at a rate of 4 to 6 quarts per acre in water spray mixture.   |
| For more mature and/or less susceptible species such as Poison oak, blackberries, Douglas fir, billow, buttonbush, black locust, sassafras, sumac, tilup poplar, and cherry                     | Apply this product at a rate of 8 quarts per acre in water spray mixture.  |
| For more resistant brush such as maple, pine sourwood, blackgum, cedar, and oak, and to improve the spectrum of species controlled.   | Apply by tank mixing 4 to 8 quarts of this product per acre with 2 to 8 quarts of Tahoe® 3A (triclopyr herbicide) or Tahoe® 4E (triclopyr herbicide) or 4 lb./gal 2,4-D low-volatile ester.  |

**NOTE:** For best results under conditions of drought stress, use the rate at the higher end of the rate range. Even these rates under such conditions may not be as effective as the lower rates under good growing conditions.

### Broadcast Treatments for Forest Site Preparation (not for conifer release)

For broadcast applications, apply the specified rate of this product 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. Use applications systems designed to prevent spray drift to off-target sites. Nozzles or additives that produce larger droplets may require higher spray volumes to provide adequate coverage.

NOTE: This use is not intended for conifer release (see precautions).

| NOTE: This use is not intended for confider release (see precautions).  |  |  |  |
|---|--|--|--|
| Southern States Including Alabama, Arkansas, Delaware, Georgia, Louisiana, Maryland, Mississippi, North Carolina, Tennessee, Texas, and Virginia  |  |  |  |
| Specific Use Directions   |  |  |  |
| a rate of 6 to 8 quarts per acre.   |  |  |  |
| a rate of 6 to 8 quarts per acre in a tank mix combination with 2 to ahoe® 4E (triclopyr herbicide).  |  |  |  |
| s also desired, this product alone or in combination with Tahoe® 4E th 1 to 4 quarts per acre of Razor® herbicide, or 8 to 16 fluid ounces C.   |  |  |  |
| a rate of 6 to 8 quarts per acre in a tank mix combintation with 3 to Razor®, or 16 to 24 fluid ounces per acre of Polaris® AC.   |  |  |  |
| In Western, Northeastern, North Central and Great Lake States (States not listed above as Southern States)  |  |  |  |
| ons   |  |  |  |
| a rate of 4 to 8 quarts per acre.   |  |  |  |
| a rate of 4 to 8 quarts per acre in a tank mix combination with 1-1/2 of Tahoe® 4E (triclopyr herbicide).   |  |  |  |
| s also desired, this product alone or in combination with Tahoe® 4E to 3 quarts per acre of Razor herbicide, 2 to 4 fluid ounces of Oust, zor® plus Oust® at the rates listed, or 8 to 16 fluid ounces per acre |  |  |  |
| to  |  |  |  |

| Specific Application  | Specific Use Directions  |  |
|---|--|--|
| To thin strands of naturally regenerated spruce and fir by applying herbicide in treated bands or strips which alternate with untreated bands or strips | Apply this product such that the rate in the treated bands or strips is 2 gallons of herbicide in a total spray mixture volume of 12 to 20 gallons. For best results, apply during the period of active conifer growth. To obtain the precise placement of spray mixture in the treated bands that is required for this technique, aerial aplications should be made using a helicopter equipped with a Microfoil or Thru-Valve boom.  Multiple treated bands may be obtained within a single spray swath by establishing alternating series of flowing and blocked spray nozzles. |  |

| Cut Surface Treatments   |   |  |
|--|---|--|
| In forest and other non-crop areas to kill unwanted trees such as elm, maple, oak, and pine apply this product, either diluted o undiluted in a 1:1 ratio with water, as directed below. The below methods may be used successfully at any season except during periods of heavy sap flow of certain species, such as maples, or during drought periods. Untreated trees wihin a few feet of the treated trees or stumps may be injured or killed. |   |  |
| Specific Application   | Specific Use Directions   |  |
| With Tree Injector Method  | Application should be made by injecting 1/2 milliliter of undiluted product or 1 milliliter of the diluted solution through the bark at intervals of 3 inches between edges of the injector wound. The injections should completely surround the tree at any convenient height.  NOTE: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is directly injected into agricultural plants. |  |
| With Frill or Girdle Method  | Make a single girdle through the bark completely around the tree at a convenient height, wet the cut surface with the diluted solution.   |  |
| Stump Treatment  | Spray or paint to wet the cut surfaces of freshly cut stumps or stubs with this product diluted or undiluted with a ratio of 1:1 in water. All of the cambium area next to the bark   |  |

| Broadcast Cut Stubble Treatment   |                         |  |
|---|-------------------------|--|
| Specific Application  | Specific Use Directions |  |
| To prevent resprouting of susceptible woody species, after mowing or hand-cutting on non-crop areas and rights-of-way | 1                       |  |

is the most vital area to wet.

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Keep container tightly closed when not in use. If exposed to subfreezing temperatures, the product should be warmed to at least 40°F and mixed thoroughly before using.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest Environmental Protection Agency Regional Office for guidance.

**CONTAINER DISPOSAL:** Do not reuse container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerator, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Consult federal, state, or local disposal authorities for approved alternative procedures.

SPRAYER CLEAN-OUT: To avoid injury to desirable plants, equipment used to apply this product should be thoroughly cleaned before reusing to apply any other products.

- A) Rinse and flush application equipment thoroughly after use. Dispose of rinse water in non-cropland area away from water supplies.
- B) Rinse again, adding 1 quart of household ammonia for every 25 gallons of water. Circulate the solution though the entire system for about 15 to 20 minutes so that all internal surfaces are contacted. Let the solution stand for several hours, preferably overnight.
- C) Flush the solution out of the spray tank through the boom.
- D) Rinse the system twice with clean water, recirculating and draining each time.
- E) Nozzles and screens should be removed and cleaned separately.