

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 3, 2020

Annette M. Bloomberg Regulatory Affairs Manager Bayer Environmental Science A Division of Bayer CropScience LP 5000 CentreGreen Way, Suite 400 Cary, NC 27513

Subject: PRIA Label Amendment – New Restricted Use on Non-hayed, Privately-Owned

Rangelands in AZ, NM, OK, and TX

Product Name: INVORA VM HERBICIDE

EPA Registration Number: 432-1582 Application Date: November 3, 2017

Decision Number: 536562

Dear Ms. Bloomberg:

The application referred to above, submitted under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable under FIFRA sec 3 (c)(5). You must submit and/or cite all data required for registration/registration/registration review of your product when the Agency requires all registrants of similar products to submit such data.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 432-1582 Decision No. 536562

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

The following alternate brand names have been added for this product:

- INVORA RANGE HERBICIDE
- INVORA GL HERBICIDE
- INVORA GRAZING LAND HERBICIDE
- INVORA 240SL
- INVORA R
- INVORA HERBICIDE

If you have any questions, please contact Margaret Hathaway by phone at 703-305-5076, or via email at Hathaway.Margaret@epa.gov.

Sincerely,

Daniel Kenny, Chief Herbicide Branch

Registration Division (7505P) Office of Pesticide Programs

Enclosure

## 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 those uses covered by the Certified Applicator's certification.

AMINOCYCLOPYRACHLOR &	GROUP	4	HERBICIDE
TRICLOPYR			

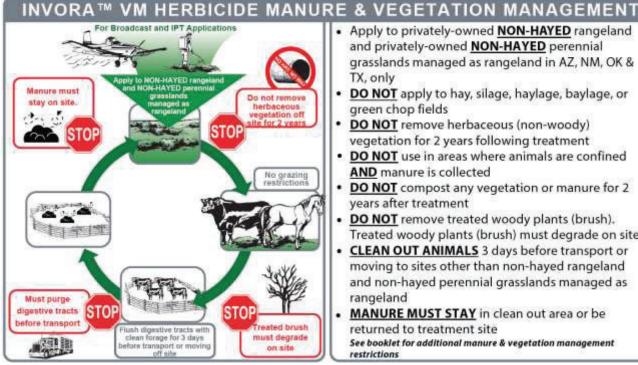
## INVORA™ VM HERBICIDE

## Soluble Liquid

[Alternate Brand Names: INVORA™ RANGE HERBICIDE, INVORA™ GL HERBICIDE, INVORA™ GRAZING LAND HERBICIDE, INVORA™ 240SL, INVORA™ R, INVORA™ HERBICIDE]

For use only in the states of Arizona, New Mexico, Oklahoma, and Texas for control of mesquite, huisache, and associated susceptible brush (woody plants) and weed species on privately-owned NON-HAYED rangeland and privately-owned NON-HAYED perennial grasslands managed as rangeland.

[Editorial Note - Pictogram Positioned on the back panel] [Brackets are optional text]



- Apply to privately-owned NON-HAYED rangeland and privately-owned NON-HAYED perennial grasslands managed as rangeland in AZ, NM, OK &
- DO NOT apply to hay, silage, haylage, baylage, or green chop fields
- DO NOT remove herbaceous (non-woody) vegetation for 2 years following treatment
- DO NOT use in areas where animals are confined AND manure is collected
- DO NOT compost any vegetation or manure for 2 years after treatment
- **DO NOT** remove treated woody plants (brush). Treated woody plants (brush) must degrade on site
- CLEAN OUT ANIMALS 3 days before transport or moving to sites other than non-hayed rangeland and non-hayed perennial grasslands managed as rangeland
- MANURE MUST STAY in clean out area or be returned to treatment site See booklet for additional manure & vegetation management

## ACCEPTED

02/03/2020

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

432-1582

## 

EPA Reg. No. 432-1582

**EPA Est.** 

**Net Contents:** 

**Shake Well Before Using** 

# DANGER/PELIGRO

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

See [Back][Side] Panel for First Aid Instructions and [Leaflet][Booklet] for Complete Precautionary Statements and Directions for Use. See back panel for manure and vegetation management restrictions.

## For <u>MEDICAL</u> and <u>TRANSPORTATION</u> Emergencies <u>ONLY</u>, Call 24 Hours a Day 1-800-334-7577 For PRODUCT USE Information Call 1-800-331-2867

FIRST AID						
If in eyes:	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 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 a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>					

In case of emergency call toll free the Bayer CropScience LP Emergency Response Telephone No. 1-800-334-7577. Have a product container or label with you when calling a poison control center, doctor, or going for treatment.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

## PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

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

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

## **USER SAFETY RECOMMENDATIONS**

### **USERS SHOULD:**

- Wash thoroughly with soap and water after handling and 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. As soon as possible, wash thoroughly and change into clean clothing.

## **ENVIRONMENTAL HAZARDS**

Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment wash waters or rinsate. This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for several months after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of aminocyclopyrachlor and triclopyr from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

Aminocyclopyrachlor and triclopyr have properties and characteristics associated with chemicals detected in ground water. These chemicals may leach into ground water if used in areas where soils are permeable, particularly where the water table is shallow.

## **DIRECTIONS FOR USE**

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

Read the entire label before using this product.

#### 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 those uses covered by the Certified Applicator's certification.

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.

INVORA<sup>TM</sup> VM HERBICIDE must be used only in accordance with directions on this label or in separately published directions. Applications must be made by or requested and approved by the land owner or manager. For lands under lease or contract agreement, the lessee must notify the lessor (land owner) of the INVORA<sup>TM</sup> VM HERBICIDE application. For use only in the states of Arizona, New Mexico, Oklahoma, and Texas for control of mesquite, huisache, and associated susceptible brush (woody plants) and weed species on **privately-owned NON-HAYED** rangeland and **privately-owned NON-HAYED** perennial grasslands managed as rangeland. Rangelands are those lands on which the vegetation is predominantly native grasses, grass-like plants, forbs, or shrubs suitable for grazing or browsing use. Perennial grasslands are those lands on which the vegetation is dominated by grasses (native or introduced species), grass-like plants, and/or forbs suitable for grazing or browsing use. Rangelands and perennial grasslands would include grazing lands that are not currently managed or intended to be managed for hay or any other agricultural crop including annual forage grasses.

INVORA™ VM HERBICIDE <u>CANNOT</u> be used on lands used for hay, haylage, baylage, green-chop or silage production, on lands where confined livestock graze **AND** manure is collected, or lands where manure is collected for compost for a period of 24 months following application of INVORA™ VM HERBICIDE.

Treated lands cannot be harvested for hay, haylage, baylage, green-chop, or silage for a period of 24 months following the application of INVORA™ VM HERBICIDE.

There is no grazing restriction for non-stabled, free-range livestock and dairy animals. INVORA<sup>TM</sup> VM HERBICIDE cannot be used on lands where livestock are confined/stabled **AND** manure is collected.

Bayer CropScience LP will not be responsible for losses or damages resulting from the use of this product in any manner not specifically directed by Bayer CropScience LP. User assumes all risks associated with such non-directed use.

## TRAINING

Prior to applying this product on rangeland, all applicator(s) must complete picolinic acid chemistry training every two years. Training must be completed through one of the following a) the state or state-authorized provider or b) the registrant or registrant-authorized provider for this product. The certified applicator must keep a record of the training for three years. This record must include date of training, provider of training, and proof of completion. Records must be made available to State Pesticide Regulatory Official(s), and EPA upon request.

## PRODUCT INFORMATION

INVORA™ VM HERBICIDE is a soluble liquid used for selective weed, invasive species, and brush (woody plants) control on **privately-owned NON-HAYED** rangeland and **privately-owned NON-HAYED** perennial grasslands managed as rangeland in the states of Arizona, New Mexico, Oklahoma and Texas, only.

The use rate depends on weed/brush spectrum and size at time of application. The degree and duration of control depends on the following:

- weed/brush (woody plants) spectrum and infestation intensity
- weed/brush (woody plants) size and maturity at application
- environmental conditions before, during, and after treatment
- application rate and coverage

## WEED RESISTANCE MANAGEMENT

Fields should be scouted prior to application to identify the weed species present and their growth stage to
determine if the intended application will be effective. Fields should be scouted after application to verify the
treatment was effective.

- Identify weeds present in the field through scouting and field history and understand their biology. The weedcontrol program should consider all of the weeds present.
- Suspected herbicide-resistant weeds may be identified by these indicators:
  - Failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds;
  - A spreading patch of non-controlled plants of a particular weed species; and
  - Surviving plants mixed with controlled individuals of the same species.
- Contact your local sales representative, crop advisor, or extension agent to find out if suspected resistant weeds
  to this mechanism of action (MOA) have been found in your region. If resistant biotypes of target weeds have
  been reported, use the application rates of this product specified for your local conditions. Tank mix products so
  there are multiple effective mechanisms of actions for each target weed.
- Report any incidence of non-performance of this product against a particular weed species to your Bayer CropScience LP distributor, Bayer CropScience LP representative or call 1-800-331-2867.
- If resistance is suspected, treat weed escapes with an herbicide having a different mechanism of action and/or use nonchemical means to remove escapes, as practical, with the goal of preventing further seed production.
- Use an integrated approach toward weed management. Whenever possible incorporate multiple weed-control practices such as mechanical cultivation, biological management practices, and crop rotation.
- To the extent possible, do not allow weed escapes to produce seeds, roots, or tubers.
- Difficult to control weeds may require sequential applications of herbicides with differing mechanisms of action.
- · Apply this herbicide at the correct timing and rate needed to control the most difficult weed in the field.
- Do not use more than two applications of this or any other herbicide with the same mechanism of action within a single growing season unless mixed with an herbicide with another mechanism of action with an overlapping spectrum for the difficult-to-control weeds.
- For mixtures of herbicides, do not assume that each listed weed is being controlled by multiple mechanisms of action.

## 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 drift management strategy is to apply the largest droplets which are consistent with pest control objectives. 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.

A droplet size classification system describes the range of droplet sizes produced by spray nozzles. The American Society of Agricultural and Biological Engineers (ASABE) provide a standard that describes droplet size spectrum categories defined by a number of reference nozzles (fine, coarse, etc.). Droplet spectra resulting from the use of a specific nozzle may also be described in terms of volume mean diameter (VMD). Coarser droplet size spectra have larger VMDs and lower drift potential.

### **CONTROLLING DROPLET SIZE - GROUND APPLICATION**

- Nozzle Type Select a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. The use of low-drift nozzles will reduce drift potential.
- Pressure The lowest spray pressures recommended for the nozzle produce the largest droplets. Higher pressure
  reduces droplet size and does not improve canopy penetration. When higher flow rates are needed, using a highercapacity nozzle instead of increasing pressure results in the coarsest droplet spectrum.
- Flow Rate/Orifice Size Using the highest flow rate nozzles (largest orifice) consistent with pest control objectives reduces the potential for spray drift. Nozzles with higher rated flows produce coarser droplet spectra.

## **CONTROLLING DROPLET SIZE - AIRCRAFT**

- Nozzle Type Solid stream or other low drift nozzles produce the coarsest droplet spectra.
- Number of Nozzles Using the minimum number of nozzles with the highest flow rate that provide uniform coverage will produce a coarser droplet spectrum.
- Nozzle Orientation Orienting nozzles in a manner that minimizes the effects of air shear will produce the coarsest droplet spectra. For some nozzles such as solid stream, pointing the nozzles straight back parallel to the airstream will produce a coarser droplet spectrum than other orientations.
- Pressure Selecting the pressure that produces the coarsest droplet spectrum for a particular nozzle and airspeed reduces spray drift potential. For some nozzle types such as solid streams, lower pressures can produce finer droplet spectra and increase drift potential.

## **BOOM LENGTH (AIRCRAFT), AND APPLICATION HEIGHT**

- Boom Length (aircraft) Using shorter booms decreases drift potential. Boom lengths are expressed as a percentage
  of an aircraft's wingspan or a helicopter's rotor blade diameter. Shorter boom length and proper positioning can
  minimize drift caused by wingtip or rotor vortices.
- Application Height (aircraft) Applications made at the lowest height consistent with pest control objectives and the safe operation of the aircraft will reduce the potential for spray drift.
- Application Height (ground) Applications made at the lowest height consistent with pest control objectives, and allow
  the applicator to keep the boom level with the application site and minimize bounce, will reduce the exposure of spray
  droplets to evaporation and wind and reduce spray drift potential.

### **WIND**

Drift potential is lowest when applications are made in light to gentle sustained winds (2-10 mph), which are blowing in a constant direction. Many factors, including droplet size and equipment type also determine drift potential at any given wind speed. AVOID GUSTY OR WINDLESS CONDITIONS.

Local terrain can also influence wind patterns. Every applicator is expected to be familiar with local wind patterns and how they affect spray drift.

### TEMPERATURE AND HUMIDITY

Setting up equipment to produce larger droplets to compensate for droplet evaporation can reduce spray drift potential. Droplet evaporation is most severe when conditions are both hot and dry.

## SURFACE TEMPERATURE INVERSIONS

Drift potential is high during a surface temperature inversion. Surface inversions restrict vertical air mixing, which may cause small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Surface 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. Mist or fog may indicate the presence of an inversion in humid areas. Inversions may also be identified by producing smoke and observing its behavior. Smoke that remains close to the ground, or moves laterally in a concentrated cloud under low wind conditions indicates a surface inversion. 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 minimizing drift potential and not interfering with uniform deposition of the product.

## **BIOLOGICAL ACTIVITY**

INVORA™ VM HERBICIDE is quickly taken up by the leaves, stems and roots of plants. The effects of INVORA™ VM HERBICIDE may be seen on plants from within a few hours to a few days. The most noticeable symptom is a bending and twisting of stems and leaves. Other advanced symptoms include severe necrosis, stem thickening, growth stunting, leaf crinkling, calloused stems and leaf veins, leaf-cupping, and enlarged roots. Death of treated broadleaf plants may require several weeks and up to several months for some plant species. Death of treated woody plants may require 1 to 2 growing seasons. In the event INVORA™ HERBICIDE at rates of 24 to 48 fluid ounce per acre (0.13 – 0.25 pounds acid equivalent of aminocyclopyrachlor and 0.25 – 0.50 pounds acid equivalent of triclopyr per acre) does not achieve adequate brush control, a follow up application may be made in accordance with annual use rate restrictions (see USE RESTRICTIONS section) and only after sufficient foliage returns to the targeted brush, typically 3 years after the initial application.

Warm, moist conditions following treatment promote the activity of INVORA™ VM HERBICIDE, while cold, dry conditions delay the activity. Weeds hardened-off by cold weather will be less susceptible. Applications made to weeds and woody plants under stress may result in unsatisfactory control.

Vigorously growing grasses will aid weed control by shading and providing competition for weeds. However, a dense canopy at time of application can intercept spray and result in reduced weed control.

INVORA™ VM HERBICIDE may injure grasses that are stressed from adverse environmental conditions such as extreme temperatures or moisture, abnormal soil conditions, or cultural practices. In addition, grass species may vary in sensitivity to treatment with INVORA™ VM HERBICIDE under otherwise normal conditions.

INVORA™ VM HERBICIDE is rain-fast at 1 hour after application.

## PREPARING FOR USE - SITE SPECIFIC CONSIDERATIONS

Understanding the risks associated with the application of INVORA™ VM HERBICIDE is essential to prevent off-site injury to desirable vegetation and agricultural crops. The risk of off-site movement both during and after application may be affected by a number of site-specific factors such as the nature, texture and stability of the soil, the intensity and direction of prevailing winds, vegetative cover, site slope, rainfall, drainage patterns, and other local physical and environmental conditions. Careful evaluation of potential off-site movement from the intended application site, including movement of

treated soil by wind or water erosion, must be made prior to using INVORA™ VM HERBICIDE. This evaluation is particularly critical where desirable vegetation or crops are grown on neighboring land for which the use of INVORA™ VM HERBICIDE is not labeled. If prevailing local conditions may result in off-site movement and cause damage to neighboring desirable vegetation or agricultural crops, DO NOT apply INVORA™ VM HERBICIDE.

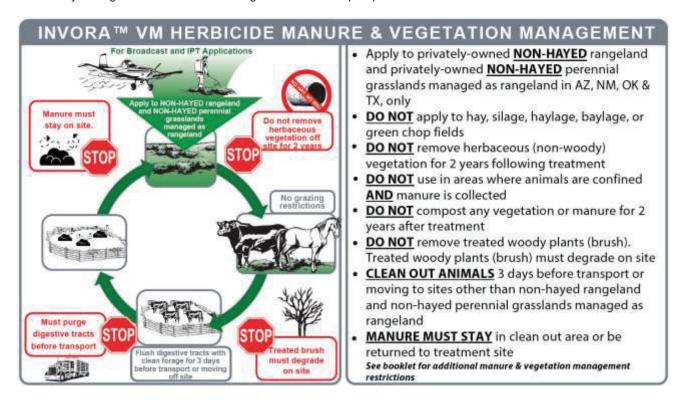
Before applying INVORA™ VM HERBICIDE the user must read and understand all label directions, precautions and restrictions completely, including these requirements for a site-specific evaluation. If you DO NOT understand any of the instructions or precautions on the label or are unable to make a site-specific evaluation yourself, consult your local Bayer CropScience LP representative, local agricultural dealer, university cooperative extension service, land manager, professional applicator, agricultural consultant, or other qualified authority familiar with the area to be treated. If you still have questions regarding the need for site specific considerations, please call 1-800-331-2867.

## LAND OWNERSHIP REQUIREMENTS PRIVATELY OWNED AND OPERATED LANDS:

INOVRA VM HERBICIDE can only be applied to privately-owned and operated lands. DO NOT apply to public lands.

## PRIVATELY OWNED LANDS MANAGED THROUGH LEASE OR CONTRACT AGREEMENT:

- · The land owner must be notified.
- INVORA VM HERBICIDE can only be applied when the lease or contract agreement has at least 2 years remaining at the time of application. For example;
  - o For a 5-year lease agreement apply no later than year 3 of the agreement
  - o For a 7-year lease agreement apply no later than year 5 of the agreement
  - o For a 10-year lease agreement apply no later than year 8 of the agreement
- This is to allow sufficient time for the land manager at the time of application and for two years thereafter to observe the 2-year vegetation and manure management stewardship requirements on this label.



### **USE RESTRICTIONS**

- DO NOT use INVORA™ VM HERBICIDE on hayed pasturelands (such as bermudagrass hay fields) or hayed rangelands. DO NOT use INVORA™ VM HERBICIDE on lands intended for hay production within a period of 2 years following treatment.
- For use only in the states of Arizona, New Mexico, Oklahoma, and Texas on privately-owned <u>NON-HAYED</u> rangeland and privately-owned <u>NON-HAYED</u> perennial grasslands managed as rangeland. DO NOT use INVORA VM HERBICIDE in any other states or territories.
- · DO NOT use on public lands.
- DO NOT move any vegetation, plant residues, grass, leaves, woody chips, or manure from treatment site or use in compost, mulch, or mushroom spawn for a period of 2 years following treatment with INVORA™ VM HERBICIDE. All treated woody plants and brush must be allowed to degrade on site and cannot be transported off the treatment site.
- · DO NOT apply by airblast spray equipment.
- Manure and urine from animals consuming vegetation from treatment site may contain enough aminocyclopyrachlor
  to cause injury to sensitive plants. DO NOT use manure resulting from consumption of vegetation treated with
  INVORA™ VM HERBICIDE for compost, mulch, or mushroom spawn for a period of 2 years following application.
- If livestock and dairy animals graze the treatment site within 24 months following an INVORA™ VM HERBICIDE application, livestock must be fed forage not previously treated with aminocyclopyrachlor or similar chemistries (including aminopyralid, clopyralid and picloram) for at least 3 days before transport off the property or being moved to sites other than non-hayed rangeland or non-hayed perennial grasslands. Suggestions for accomplishing this task include 1) only treating a portion of the site to allow transfer of livestock to the non-treated rangeland or non-hayed perennial grasslands managed as rangeland for 3 days to allow clean-out of the animals prior to transport, or 2) restrict grazing of the treatment site by confining livestock and providing forage not previously treated with aminocyclopyrachlor or similar chemistries (including aminopyralid, clopyralid and picloram) for a period of 3 days. Any collected manure resulting from consumption of vegetation treated with INVORA™ VM HERBICIDE should be spread on the original treatment site and cannot be transported off treatment site.
- Treatment of powdery, dry soil and light sandy soils when there is little likelihood of rainfall soon after treatment may
  result in off target movement and possible damage to susceptible crops and desirable vegetation when soil particles
  are moved by wind or water. Injury to crops or desirable vegetation may result if treated soil is washed, blown or
  moved onto land used to produce crops or land containing desirable vegetation. DO NOT apply INVORA™ VM
  HERBICIDE when these conditions are identified and powdery, dry soil or light sandy soils are known to be prevalent
  in the area to be treated.
- DO NOT apply or otherwise permit this product, or sprays containing this product, to come into contact with any non-target crop or desirable vegetation.
- DO NOT apply this product to areas where the roots of desirable trees and/or shrubs may extend unless injury or
  loss can be tolerated. Root zone areas of desirable trees or vegetation are affected by local conditions and can
  extend well beyond the tree canopy.
- DO NOT apply this product if site-specific characteristics and conditions exist that could contribute to movement and unintended root zone exposure to desirable trees or vegetation unless injury or loss can be tolerated.
- · DO NOT apply directly to water.
- Applications made to soils saturated with water, or soils through which rainfall will not readily penetrate may result in runoff and movement of INVORA™ VM HERBICIDE. DO NOT apply INVORA™ VM HERBICIDE when these conditions exist.
- DO NOT make applications when circumstances favor movement from treatment site.
- DO NOT apply when wind speed is greater than 10 mph or during a temperature inversion.
- DO NOT apply when the soil is frozen or covered with snow.
- DO NOT use on ornamental turfgrass (commercial turf, lawns, and sod farms), walks, driveways, or similar areas.
- · DO NOT use on grasses grown for seed.
- DO NOT enter or allow worker entry into the treated area until sprays have dried.
- DO NOT apply to annually seeded forage crops, including but not limited to wheat, rye, triticale, oats, ryegrass, sorghum sudangrass, millet, and broadleaf forage legumes. Forage legumes may not grow for several years following application of this herbicide.
- If sites treated with INVORA™ VM HERBICIDE are to be converted to a food, feed, fiber, or horticultural crop, DO NOT plant the treated sites for at least two years after the INVORA™ VM HERBICIDE application and then only after a successful field bioassay with the desired crop. Refer to the FIELD BIOASSAY section of this label.
- DO NOT apply INVORA™ VM HERBICIDE to foxtails, ryegrass (Italian or perennial), or squirreltail, as severe

- injury and/or stand loss may occur.
- DO NOT apply more than 54 fluid ounces (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre per year.
- DO NOT apply more than 48 fluid ounces (0.25 pounds acid equivalent of aminocyclopyrachlor and 0.50 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre in a single application.
- DO NOT make more than two applications per year of INVORA™ VM HERBICIDE when using reduced application rates. Allow at least 14 days between applications of INVORA™ VM HERBICIDE.
- If tank-mixing or sequentially applying products containing triclopyr, apply no more than 2 pounds acid equivalent of
  triclopyr per acre per growing season on any approved terrestrial use site that domestic livestock graze. For all
  non-grazed terrestrial use sites, the maximum application rate is 9 pounds acid equivalent of triclopyr per acre per
  year.
- Commercial certified applicators must also ensure that all persons involved in the application are informed of the precautionary statements, restrictions, precautions, limitations, and use directions.
- DO NOT apply through any type of irrigation system or contaminate water intended for irrigation.

## BUFFER ZONE RESTRICTIONS PROPERTY LINE BUFFERS:

- DO NOT apply INVORA™ VM HERBICIDE aerially or ground broadcast within 100 ft of adjacent property lines. A
  larger buffer zone may be necessary when sensitive crops are near the application zone or prevailing winds are
  blowing toward sensitive crops.
- Individual plant treatment (IPT) applications (IPT leaf sprays, cut stump treatment, or basal stem spray) of INVORA™ VM HERBICIDE may be made up to the property line.
- DO NOT allow this product to drift onto adjacent properties or sensitive crops or apply this product within the root zone of susceptible trees (note: tree roots on adjacent properties may extend well beyond the property line and into the soil of the treatment site; observe these precautions to avoid impacting trees on adjoining property).

## BUFFER ZONE RESTRICTIONS FOR WATER BODIES AREAS OF TEMPORARY SURFACE WATER:

- This product may be applied to terrestrial sites that contain areas of temporary surface water, caused by collection of water 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.

## FREE-FLOWING WATER BODIES (CREEKS, STREAMS, RIVERS, ETC):

- DO NOT apply INVORA™ VM HERBICIDE within 100 ft of water's edge when applying aerially or by ground broadcast.
- Individual plant treatment (IPT) applications (IPT leaf sprays, cut stump treatments, or basal stem sprays) of INVORA™ VM HERBICIDE may be made up to the water's edge.
- DO NOT apply this product directly to or allow this product to drift into water.

## NON-FREE-FLOWING WATER BODIES (PONDS, LAKES, ETC.):

- For non-free flowing, non-irrigation water bodies wholly located on the treatment site:
  - Aerial broadcast, ground broadcast, and IPT applications (IPT leaf sprays, cut stump treatments, or basal stem sprays) are permissible up to the water's edge.
  - DO NOT apply this product directly to or allow this product to drift into water.
- For non-free flowing water bodies used for irrigation and/or NOT wholly located on the treatment site:
  - o DO NOT apply INVORA™ VM HERBICIDE within 100 ft of water's edge when applying aerially or by ground broadcast.
  - Individual plant treatment (IPT) applications (IPT leaf sprays, cut stump treatments, or basal stem sprays) of INVORA™ VM HERBICIDE may be made up to water's edge.
  - DO NOT apply this product directly to or allow this product to drift into water.

### **IRRIGATION DITCHES OR CANALS:**

- DO NOT apply INVORA™ VM HERBICIDE within 100 ft of the outer banks of irrigation ditches or canals when
  applying aerially or by ground broadcast.
- Individual plant treatment (IPT) applications (IPT leaf sprays, cut stump treatments, or basal stem sprays) of INVORA™ VM HERBICIDE may be made up to but NOT on the outer banks of dry or water-containing irrigation canals or ditches.
- · DO NOT apply through any type of irrigation system or contaminate water intended for irrigation.
- DO NOT treat or allow spray drift or run-off to fall onto banks or bottoms of irrigation ditches, either dry or water-containing, or other channels that carry irrigation water.
- DO NOT apply this product directly to or allow this product to drift into water.

## **GRAZING/HAYING RESTRICTIONS**

- There are no restrictions on grazing following application of INVORA™ VM HERBICIDE at labeled rates.
- DO NOT move vegetation of any kind or mechanically harvest forage, hay, grass, straw, green-chop, haylage, baylage, or silage from treated areas for a period of 24 months following application of INVORA™ VM HERBICIDE.
- DO NOT use vegetation from treatment area or manure resulting from grazing animals as compost, mulch, garden bedding, or mushroom spawn.
- DO NOT move manure resulting from grazing animals within a period of 24 months following application of INVORA™ VM HERBICIDE from the treatment area.
- If livestock and dairy animals have grazed areas treated with INVORA™ VM HERBICIDE within the past 24
  months, those animals must be fed forage free of aminocyclopyrachlor for at least 3 days before moving to non-hayed rangeland or non-hayed perennial grasslands, or movement off the property.

### **SLAUGHTER RESTRICTIONS**

Within 12 months after the last application, withdraw livestock from grazing treated areas at least 3 days before slaughter.

## **USE PRECAUTIONS**

- Certain species may, in particular, be sensitive to low levels of INVORA™ VM HERBICIDE including but not limited
  to conifers (such as Douglas fir, Norway spruce, ponderosa pine and white pine), deciduous trees (such as aspen,
  Chinese tallow, cottonwood, honey locust, magnolia, poplar species, redbud, silver maple, and willow species), and
  ornamental shrubs (such as arborvitae, burning bush, crape myrtle, forsythia, hydrangea, ice plant, magnolia,
  purple plum and yew).
- Injury or loss of desirable trees or vegetation may result if INVORA™ VM HERBICIDE is applied on or near desirable trees or vegetation, on areas where their roots extend, or in locations where the treated soil may be washed or moved into contact with their roots. Consider site-specific characteristics and conditions that could contribute to unintended root zone exposure to desirable trees or vegetation. Root zone areas of desirable trees or vegetation are affected by local conditions and can extend beyond the tree canopy. If further information is needed regarding root zone area, consult your local Bayer CropScience LP representative, local agricultural dealer, university cooperative extension service, land manager, professional applicator, agricultural consultant, or other qualified authority familiar with the area to be treated.
- Caution is advised when using this product in areas where loss of desirable conifer or deciduous trees and/or shrubs as well as other broadleaf plants cannot be tolerated. Without prior experience, it is necessary that small areas containing these plants be tested for tolerance to INVORA™ VM HERBICIDE and its soil residues before any large-scale spraying occurs.
- Injury to or loss of desirable trees or vegetation may result if equipment is drained or flushed on or near these trees or vegetation, on areas where their roots extend, or in locations where the chemical may be washed or moved into contact with their roots.
- In areas adjacent to desirable vegetation, avoid overlapping spray applications and shut off spray to the spray boom while starting, turning, slowing or stopping to avoid injury to desirable vegetation.
- Applications made where runoff water flows onto agricultural land may injure or kill crops, such as but not limited to sugar beets, potatoes, tomatoes, tobacco, soybeans, field beans, alfalfa, grapes, peaches, almonds, and vegetables.
- Applications should be made only when there is little or no hazard from spray drift. Very small quantities of spray, which may not be visible, may seriously injure susceptible plants.
- Exposure to INVORA™ VM HERBICIDE may injure or kill most crops and may injure or kill desirable vegetation. Injury may be more severe when the crops or desirable vegetation are irrigated.

- Low rates of INVORA™ VM HERBICIDE can kill or severely injure most crops. Following an INVORA™ VM
   HERBICIDE application, the use of spray equipment to apply other pesticides to crops on which INVORA™ VM
   HERBICIDE is not registered may result in injury. The most effective way to reduce this crop damage potential is to
   use dedicated mixing and application equipment.
- Leave treated soil undisturbed to reduce the potential for INVORA™ VM HERBICIDE movement by soil erosion
  due to wind or water.
- In the case of suspected off-site movement of INVORA™ VM HERBICIDE to cropland, soil samples should be
  quantitatively analyzed for INVORA™ VM HERBICIDE or any other herbicide which could be having an adverse
  effect on the crop, in addition to conducting the field bioassay.
- Caution is advised when using this product on grass that is stressed by drought, water saturated soils, wide fluctuations in day and night temperatures, low fertility, insect damage, or disease as unacceptable grass injury may occur.

### FIELD BIOASSAY

Before planting a new crop, use a field bioassay to verify that the level of INVORA™ VM HERBICIDE present in the soil will not adversely affect the planned crop. To conduct a field bioassay, grow to maturity test strips of the crop you plan to grow the following year. The test strips must cross the entire field including knolls and low areas. Crop response to the field bioassay will indicate whether or not to plant the crops grown in the test strips. If no crop injury (such as, poor germination, stunting, chlorosis, malformation, or necrosis of leaves) or yield loss is evident from the crops grown in the test strips, the intended rotational crop may be planted. If herbicide symptoms or yield loss is observed DO NOT plant the crop.

### **SPRAY ADJUVANTS**

Consult your Agricultural dealer or applicator, local Bayer CropScience LP fact sheets and technical bulletins prior to using an adjuvant system. If another herbicide is tank mixed with INVORA™ VM HERBICIDE, select adjuvants authorized for use with both products. Products must contain only EPA-exempt ingredients.

For broadcast applications targeting woody plants (brush), include a methylated seed oil + organo-silicone surfactant (MSO-OS) as a spray adjuvant with applications of INVORA™ VM HERBICIDE, unless specified otherwise in the CROP SPECIES PRECAUTIONS section of this label. Apply at the recommended rate based on the MSO-OS product label.

For broadcast applications targeting herbaceous (non-woody) vegetation, include a methylated seed oil + organo-silicone surfactant (MSO-OS) or non-ionic surfactant with at least 80% active ingredients as a spray adjuvant with applications of INVORA<sup>™</sup> VM HERBICIDE, unless the CROP SPECIES PRECAUTIONS section of this label specifies otherwise. Apply at the recommended rate based on the non-ionic surfactant product label.

For foliar leaf spray applications (individual plant treatment - leaf spray applications), include a methylated seed oil + organo-silicone surfactant (MSO-OS) or a non-ionic surfactant with at least 80% active ingredients as a spray adjuvant with applications of INVORA™ VM HERBICIDE. Apply at the recommended rate based on the adjuvant product label, or at 0.5% v/v if specified on Bayer CropScience LP product literature or information.

Antifoaming agents and dyes may be added to the tank as needed.

## INTEGRATED PEST MANAGEMENT

This product may be used as part of an Integrated Pest Management (IPM) program that can include biological, cultural, and mechanical 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 pests in your area.

#### WILDLIFE CONSIDERATIONS

Invasive brush (woody plants) can obstruct production of wildlife-desired vegetation on native rangelands, however adequate brush cover is necessary to promote healthy, wildlife habitat. Land owners are encouraged to leave a portion of their rangeland untreated to provide adequate cover and/or browse for wildlife. The amount and distribution of brush to leave should be determined by the wildlife species present and/or desired. Before applying brush control practices, land owners are encouraged to consult wildlife biologists with USDA/NRCS, state and county extension offices, state wildlife organizations, or other qualified groups for best management practices.

## COMPATIBILITY TESTING AND TANK MIX PARTNERS BEFORE SPRAYING

The spray equipment must be clean before INVORA™ VM HERBICIDE is sprayed. Follow the cleanup procedures specified on the labels of the previously applied products. If no directions are provided, follow the six steps outlined in the EQUIPMENT/SPRAYER CLEANUP PROCEDURE section of this label.

#### TANK MIX PARTNERS

INVORA<sup>TM</sup> VM HERBICIDE may be tank mixed with other herbicides, insecticides and fungicides registered for the same use sites, methods of application and timings as specified on this product label. However, there is potential for adverse chemical reactions. It is impossible to determine physical, biological, and plant compatibility for all scenarios that may be encountered; therefore, it is recommended that users determine the chemical, physical, biological and plant compatibility of such mixes prior to application on a broad commercial scale. Refer to the tank mix product label for any additional instructions or use restrictions. It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

### **ORDER OF MIXING**

INVORA™ VM HERBICIDE may be used with other recommended pesticides, fertilizers, and micronutrients. The proper mixing procedure for INVORA™ VM HERBICIDE alone or in tank mix combinations with other pesticides is:

- 1. Fill the tank 1/3 to 1/2 full of water.
- While agitating, add dry formulated active ingredients if any are going to be tank mixed with INVORA™ VM HERBICIDE.
- 3. Continue filling tank with water.
- 4. After the dry ingredients are fully dispersed, add the required amount of INVORA™ VM HERBICIDE.
- 5. Next add any other liquid formulated active ingredients, with the oil-based formulations (ECs) last.
- 6. Always add spray adjuvants after all active ingredients have been added and are fully dispersed.
- 7. If the mixture is not continuously agitated, settling may occur if tank mix partners are added. If settling occurs, thoroughly re-agitate before using.
- 8. Apply INVORA™ VM HERBICIDE spray solution within 24 hours of mixing to avoid product degradation.

## EQUIPMENT/SPRAYER CLEANUP PROCEDURE SPRAY EQUIPMENT

Low rates of INVORA™ VM HERBICIDE can kill or severely injure most broadleaf crops and other desirable vegetation. Applying pesticides or fertilizers to crops with the same equipment used to apply INVORA™ VM HERBICIDE may result in damage or loss. The most effective way to reduce this crop damage potential is to use dedicated mixing and application equipment.

## AT THE END OF THE DAY

It is recommended that at the end of each day of spraying INVORA™ VM HERBICIDE 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 which can accumulate in the application equipment.

#### SPRAYER CLEANUP

Thoroughly clean all mixing and spray equipment following applications of INVORA™ VM HERBICIDE as follows:

- 1. Drain tank; thoroughly rinse spray tanks, boom, and hoses with clean water.
- 2. Fill the tank with clean water and 1 gallon of household ammonia (contains 3% active) for every 100 gallons of water. Flush the hoses, boom, and nozzles with the cleaning solution. Then add more water to refill the tank. Circulate the cleaning solution through the tank and hoses for at least 15 minutes. Flush the hoses, boom, and nozzles again with the cleaning solution, and then drain the tank. Equivalent amounts of an alternate strength ammonia solution or a commercial cleaner can be used in the cleanup procedure. If a commercial cleaner is used, carefully read and follow the individual cleaner instructions.
- 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. Dispose of the rinsate on a labeled site or at an approved waste disposal facility. If a commercial cleaner is used follow the directions for rinsate disposal on the label.

Caution: DO NOT use chlorine bleach with ammonia as dangerous gases will form. DO NOT clean equipment in an enclosed area.

## Notes:

- 1. Steam-clean aerial spray tanks to facilitate the removal of any caked deposits.
- 2. When INVORA™ VM HERBICIDE is tank mixed with other pesticides, all cleanout procedures for each product

- must be examined and the most rigorous procedure must be followed.
- 3. In addition to this cleanout procedure, all pre-cleanout guidelines on subsequently applied products must be followed as per the individual labels.

## **CROP SPECIES PRECAUTIONS**

The following grasses have specific application information to minimize the potential for crop injury. The use rates below are per application. Avoid application to these grasses during times of stress as the potential of crop injury is higher. Varieties and species of grasses vary in their ability to tolerate herbicides. Only apply to established, mature grass stands. When using INVORA™ VM HERBICIDE on a particulate grass for the first time, limit the use to a small area.

Higher labeled rates may be applied if the possibility of moderate crop injury can be tolerated. Grasses should recover from transient crop response as brush (woody plants) and weeds are eliminated, and favorable environmental conditions support growth.

**Bermudagrass (Non-hayed):** From greenup in the spring until fall dormancy, apply 12 fluid ounces (0.06 pounds acid equivalent of aminocyclopyrachlor and 0.12 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre.

**Bromes (Non-hayed):** Apply 12 fluid ounces (0.06 pounds acid equivalent of aminocyclopyrachlor and 0.12 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre. Only use non-ionic surfactant (NIS) at 1 pint to 1 quart per 100 gallons of spray solution. DO NOT use a surfactant when liquid nitrogen fertilizer is used as a carrier.

**Timothy (Non-hayed):** Apply 12 fluid ounces (0.06 pounds acid equivalent of aminocyclopyrachlor and 0.12 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre.

Wheatgrass (Non-hayed): Apply 12 fluid ounces (0.06 pounds acid equivalent of aminocyclopyrachlor and 0.12 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre. Only use non-ionic surfactant (NIS) at 1 pint to 1 quart per 100 gallons of spray solution.

Wildrye (Non-hayed): Apply 12 fluid ounces (0.06 pounds acid equivalent of aminocyclopyrachlor and 0.12 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre.

## BROADCAST APPLICATIONS AERIAL APPLICATIONS

INVORA™ VM HERBICIDE may be applied by either fixed-wing aircraft or helicopter spray equipment. However, DO NOT apply by air unless appropriate buffer zones can be maintained to minimize potential spray drift out of the target areas.

For aerial applications of INVORA™ VM HERBICIDE a 100 ft buffer must be observed to (1) adjacent property lines, (2) free-flowing water bodies, (3) non-free-flowing water bodies not wholly located on the treatment site, and/or (4) water bodies used for irrigation purposes (see BUFFER ZONE RESTRICTIONS section on this label.)

Mount the spray boom on the aircraft to minimize drift caused by wing tip vortices. The minimum practical boom length should be used and should not exceed 75% of the wing span or rotor diameter. Applications should not be made at a height greater than 10 feet above the vegetation canopy, unless a greater application height is necessary for pilot safety.

When applying by air, use nozzles that deliver coarse to very coarse droplets as defined by ASABE S572 standard. Using smaller droplets than specified will not improve herbicide performance but will increase the risk of offsite movement through drift. Using larger droplets than specified will most likely result in reduced herbicide performance. DO NOT apply when wind speed is greater than 10 mph. DO NOT apply during a temperature inversion. For aerial applications near susceptible crops or other desirable plants, use a drift control additive as recommended by the manufacturer, or apply through a "Microfoil" or "Thru-Valve" boom, or use an equivalent drift control system. Thickened sprays prepared by using high viscosity invert systems or other drift control systems may be utilized if drift control is comparable to that obtained with drift control additives or the "Thru-Valve" boom. If a spray thickening agent is used, follow all recommendations and precautions on the product label. DO NOT use a thickening agent with the "Microfoil" boom or other systems that cannot accommodate thick sprays.

Select a spray volume and delivery system that will ensure thorough coverage and a uniform spray pattern. Be sure the sprayer is calibrated. Avoid overlapping and shut off spray booms while starting, turning or slowing to avoid injury to desired species. The application volume required will vary with the height and density of the weeds and brush (woody plants) and the type of application equipment. In general, aerial application spray volumes range from 4 to 10 gallons per acre.

### **GROUND APPLICATIONS**

When applying by ground application equipment, use nozzles that deliver coarse to very coarse droplets as defined by ASABE S572 standard. Using smaller droplets than specified will not improve herbicide performance but will increase the risk of offsite movement through drift. Using larger droplets than specified will most likely result in reduced herbicide performance. DO NOT apply with a nozzle height greater than 4 feet above the ground or canopy unless necessitated for equipment safety. Apply with the spray boom or nozzle height as low as possible. Avoid overlapping and shut off spray booms while starting, turning, slowing, or stopping to avoid injury to desired species.

Be sure the sprayer is calibrated before use. Select a spray volume and delivery system that will ensure thorough coverage and a uniform spray pattern. Ground broadcast applications typically require 10 to 20 gallons per acre to ensure thorough coverage when applying INVORA™ VM HERBICIDE.

For ground broadcast applications of INVORA™ VM HERBICIDE a 100 ft buffer must be observed to (1) adjacent property lines, (2) free-flowing water bodies, (3) non-free-flowing water bodies not wholly located on the treatment site, and/or (4) water bodies used for irrigation purposes (see BUFFER ZONE RESTRICTIONS section on this label.)

## **USE RATES FOR AERIAL AND GROUND BROADCAST APPLICATIONS**

INVORA™ VM HERBICIDE may be applied from 12 to 48 fluid ounces (0.06 to 0.25 pounds acid equivalent of aminocyclopyrachlor and 0.12 to 0.5 pounds acid equivalent of triclopyr) as a broadcast spray for selective weed and brush (woody plants) control in **privately-owned NON-HAYED** rangeland and **privately-owned NON-HAYED** perennial grasslands managed as rangeland. DO NOT apply more than 48 fluid ounces (0.25 pounds acid equivalent of aminocylopyrachlor and 0.50 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per single application. DO NOT apply more than 54 fluid ounces of INVORA™ VM HERBICIDE (0.28 pounds acid equivalent of aminocylopyrachlor and 0.56 pounds acid equivalent of triclopyr) per broadcast acre per year through combined broadcast and spot applications.

## WEEDS CONTROLLED WITH BROADCAST APPLICATIONS

Apply INVORA™ VM HERBICIDE post emergence to control weeds listed on this label. INVORA™ VM HERBICIDE also provides residual control of susceptible weeds.

For optimum control of annuals (a) and biennials (b) apply INVORA™ VM HERBICIDE to small, actively growing weeds. For optimum control of perennials (p) apply INVORA™ VM HERBICIDE to weeds in the rosette or bud to bloom stage. For optimum control of woody plants apply INVORA™ VM HERBICIDE after the leaves are fully expanded and foliage is mature. For additional weed control information on select weeds, see Specific Weed Instructions.

For heavy weed infestations, larger weeds or hard to control species use the higher herbicide, adjuvant and spray volume rates. DO NOT apply more than 54 fluid ounces product (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopyr) per acre per year.

BROADLEAF WEEDS AND BR	RATE	
Broomweed, common	Amphiachyris dracunculoides (a¹)	
Buttercup	Ranunculus sp. (a/p¹)	
Carrot, wild	Daucus carota (b¹)	$\neg$
Clover, sweet	Melilotus sp. (a)	$\neg$
Clover, white	Trifolium repens (p)	$\neg$
Cocklebur	Xanthium strumarium (a)	$\neg$
Croton, woolly	Croton capitatus (a)	$\neg$
Dandelion	Taraxacum officinale (p)	$\neg$
Dogfennel	Eupatorium capillifolium (a)	$\neg$
Horsenettle Solanum carolinense (p)		12 to 24 fluid ounces per acre
Ironweed, tall	Vernonia gigantea (p)	$\neg$
Lettuce, prickly	Lactuca serriola (a)	$\neg$
Marestail (horseweed)	Conyza canadensis (a)	$\neg$
Ragweed, common	Ambrosia artemisiifolia (a)	$\neg$
Ragweed, giant	Ambrosia trifida (a)	$\neg$
Ragweed, western	Ambrosia psilostachya (p)	$\neg$
Sesbania, hemp	Sesbania herbacea (a)	
Sicklepod	Senna obtusifolia (a)	$\neg$
Sneezeweed, bitter	Helenium amarum (a)	
Starthistle, yellow	Centaurea solstitalis (a)	$\neg$

Thistle, bull	Cirsium vulgare (b)	
Thistle, musk	Carduus nutans (a or b)	
Bindweed, field	Convolvulus arvensis (p)	
Hemlock, poison	Conium maculatum (p)	
Knapweed, diffuse	Centaurea diffusa (b)	7
Knapweed, Russian <sup>2</sup>	Rhaponticum repens (p)	7
Knapweed, spotted	Centaurea stoebe (b)	
Kochia <sup>3</sup>	Kochia scoparia (a)	
Lespedeza, sericea	Lespedeza cuneata (p)	24 to 36 fluid ounces per acre
Mesquite, honey <sup>2</sup>	Prosopis glandulosa (p)	┑ :
Rose, multiflora	Rosa multiflora (p)	7
Skeletonweed, rush <sup>2</sup>	Chondrilla juncea (p)	
Spurge, leafy	Euphorbia esula (p)	7
Tansy, common	Tanacetum vulgare (p)	
Thistle, Canada	Cirsium arvense (p)	7
Velvetleaf	Abutilon theophrasti (a)	
Mesquite, Western Honey <sup>2</sup>	Prosopis glandulosa var. torreyana (p)	36 to 48 fluid ounces per acre
Huisache <sup>2</sup>	Acacia smallii (p)	
Mesquite, Velvet	Prosopis velutina (p)	48 fluid ounces per acre

<sup>&</sup>lt;sup>1-</sup>(a)-annual, (b)-biennial, and (p)-perennial.

## SPECIFIC WEED INSTRUCTIONS

**Huisache**: For optimum control, apply in the fall before November 1st. Avoid application if leaf canopy is over 25% damaged due to hail, insects, or disease. Apply INVORA™ VM HERBICIDE at 36 to 48 fluid ounces per acre (0.19 to 0.25 pounds acid equivalent of aminocyclopyrachlor and 0.37 to 0.50 pounds acid equivalent of triclopyr) broadcast or 6 quarts per 100 gallons of spray solution for foliar leaf sprays on individual plants.

Honey Mesquite: Make application in the late spring to midsummer when foliage is mature with a dark green color and when soil temperature reaches 75° F at a depth of 12 inches. Avoid applications when new mesquite growth is present due to recent rainfall. For best results, use an MSO-OS adjuvant at 0.5% v/v in broadcast applications. For best results with aerial applications, use at least 4 gpa carrier volume. For foliar individual plant treatments, mix INVORA™ VM HERBICIDE at 6 quarts, and an approved MSO-OS adjuvant at 2 quarts in enough water to form 100 gallons of spray solution. For broadcast applications, use INVORA™ VM HERBICIDE at 24 to 36 fluid ounces per acre (0.13 to 0.19 pounds acid equivalent of aminocyclopyrachlor and 0.25 to 0.37 pounds acid equivalent of triclopyr). Avoid application if leaf canopy is over 25% damaged due to hail, insects, disease, or drought.

**Western Honey Mesquite**: For Western Honey Mesquite (torreyana mesquite) broadcast applications, use INVORA™ VM HERBICIDE at 36 to 48 fluid ounces per acre (0.19 to 0.25 pounds acid equivalent of aminocyclopyrachlor and 0.37 to 0.50 pounds acid equivalent of triclopyr). Make applications in the late summer to early fall, when there is adequate soil moisture. Avoid application if leaf canopy is over 25% damaged due to hail, insects, disease, or drought.

Rush Skeletonweed, Russian knapweed: For best results, make application in the fall after a killing frost but before snow accumulates or in the early spring to small rosettes.

## INDIVIDUAL PLANT TREATMENT (IPT) AND SPOT APPLICATIONS

INVORA<sup>TM</sup> VM HERBICIDE may be used for spot applications or Individual Plant Treatments (IPT) for the suppression or control of broadleaf weeds and brush (woody plants). IPT applications may be made with equipment such as back pack sprayers, ATV or UTV mounted sprayers, or hand sprayers. INVORA<sup>TM</sup> VM HERBICIDE should be applied as a spray to the foliage and stems. Thorough coverage of all foliage and stems is necessary to optimize results. Spray entire canopy to wet but not to the point of dripping.

IPT leaf sprays of INVORA™ VM HERBICIDE may be made up to (1) adjacent property lines, (2) water's edge of free-

<sup>&</sup>lt;sup>2</sup>-See the Specific Weed Instructions section.

<sup>&</sup>lt;sup>3</sup>-A naturally resistant biotype of this weed is known to occur.

flowing water bodies, (3) water's edge of non-free-flowing water bodies, and (4) the outer banks but <u>NOT</u> including the outer banks of irrigation ditches or canals (see BUFFER ZONE RESTRICTIONS section on this label.) Regardless of the application method, DO NOT apply or allow this product to drift onto adjacent properties, water bodies, or within the root zone of susceptible trees (note: tree roots on adjacent properties may extend well beyond the property line and into the soil of the treatment site; observe these precautions to avoid impacting trees on adjoining property).

## **USE RATES FOR SPOT APPLICATIONS FOR WEEDS**

For broadleaf weeds, mix a 0.25% to 0.5% solution of INVORA™ VM HERBICIDE with 0.25% non-ionic surfactant, or 0.5% methylated seed oil + organo-silicone surfactant (MSO-OS), in water. See the following table for proper mixing rates for broadleaf weeds based on total spray volume desired.

Desired Volume of Spot Application Solutions for <u>Broadleaf Weeds</u>						Maximum Volume of Spray Solution that Can Be
	1 gallon 5 gallons 10 gallons 25 gallons					
Product	Rate (v/v)	Fluid Ounces (	Gallons			
INVORA™	0.25%	0.3 (9)	1.6 (47)	3.2 (94)	8.0 (236)	149
VM HERBICIDE	0.50%	0.6 (18)	3.2 (94)	6.4 (189)	16 (473)	74
A .!!th	0.25%	0.3 (9)	1.6 (47)	3.2 (94)	8.0 (236)	0 Adimondal abad
Adjuvant <sup>b</sup>	0.50%	0.6 (18)	3.2 (94)	6.4 (189)	16 (473)	See Adjuvant Label

a. DO NOT apply more than 48 fluid ounces (0.25 pounds acid equivalent of aminocyclopyrachlor and 0.50 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre in a single application. DO NOT apply more than 54 fluid ounces of INVORA™ VM HERBICIDE (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopyr) per field acre per year as a result of broadcast and spot applications. To observe this maximum use rate, observe the maximum number of gallons of the respective spray solution that can be applied per acre.

## **USE RATES FOR FOLIAR IPT APPLICATIONS**

For vines, brambles, and brush (woody plants) listed below mix a 1.5% solution of INVORA™ VM HERBICIDE with 0.5% methylated seed oil + organo-silicone (MSO-OS) surfactant, or 0.5% non-ionic surfactant with at least 80% active ingredients, in water. To ensure uniform coverage of all foliage and optimum performance, a marking dye should be added to the tank to help identify plants that have been sprayed. The optimal time for application is late spring through early fall to plants that are actively growing. For best results, avoid spraying brush (woody plants) that is highly insect damaged, drought stressed, or defoliated. See the following two tables for woody plant species controlled and proper mixing rates based on total spray volume desired.

b. Include 0.25% non-ionic surfactant (NIS) **OR** 0.5% methylated seed oil + organo-silicone surfactant (MSO-OS) in the spray solution.

BRUSH (WOODY PLANT) SPECIES <sup>a</sup>	
Acacia, Catclaw	Acacia greggii
Agarito (a.k.a. Algerita)	Mahonia trifoliolata
Amargoso (a.k.a. Goat-bush & Allthorn Goatbush)	Castela erecta
Blackbrush	Acacia rigidula
Brasil	Condalia hookeri
Bumelia	Bumelia lanuginosa
Coyotillo	Karwinskia humboldtiana
Granjeno (a.k.a. spiny hackberry)	Celtis pallida
Huisache	Acacia smallii
Lotebush	Zizyphus obtusifolia
Mesquite, Honey	Prosopis glandulosa var. glandulosa
Mesquite, Western Honey	Prosopis glandulosa var. torreyana
Mimosa, Catclaw	Mimosa biuncifera
Mountain Laurel, Texas	Sophora secundiflora
Persimmon, Common	Diospyros virginiana
Persimmon, Texas	Diospyros texana
Pricklyash, Lime	Zanthoxylum fagara
Rue, African	Peganum harmala
Sumac, Flameleaf	Rhus copallina
Tasajillo	Opuntia leptocaulis
Whitebrush	Aloysia gratissima
Yaupon	llex vomitoria
Yucca	Yucca spp.

a. DO NOT apply more than 54 fluid ounces of INVORA™ VM HERBICIDE (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopyr) per field acre per year as a result of broadcast and spot applications.

Desired Volume of IPT Leaf Spray Solution for <u>Woody Plants</u> 1 gallon					Maximum Volume of Spray Solution that Can Be Applied Per Acre <sup>a</sup>	
INVORA™ VM HERBICIDE	1.50%	1.9 (56)	9.6 (283) 19.2 (567) 48 (1419)			24.8
Adjuvant <sup>b</sup>	0.50%	0.6 (18)	3.2 (94)	6.4 (189)	16 (473)	See Adjuvant Label

- a. DO NOT apply more than 48 fluid ounces (0.25 pounds acid equivalent of aminocyclopyrachlor and 0.50 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre in a single application. DO NOT apply more than 54 fluid ounces of INVORA™ VM HERBICIDE (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopyr) per field acre per year as a result of broadcast and spot applications. To observe this maximum use rate, observe the maximum number of gallons of the spray solution that can be applied per acre.
- b. Include 0.5% non-ionic surfactant (NIS) <u>OR</u> methylated seed oil + organo-silicone surfactant (MSO-OS) in the spray solution.

## **CUT STUMP TREATMENT**

Apply INVORA™ VM HERBICIDE with a backpack sprayer or equivalent using low pressure and solid cone or flat fan nozzles. Thoroughly wet, but not to the point of runoff, the cut surface of the stump, including the cambium layer next to the bark, the sides of the stump and the root collar area. On larger trees, treat only the outer 2-3 inches of the cut surface of the stump. On trees 5 inches or less in diameter treat the entire cut surface. Apply to freshly cut stumps immediately after cutting.

Cut stump treatments of INVORA™ VM HERBICIDE may be made up to (1) adjacent property lines, (2) water's edge of free-flowing water bodies, (3) water's edge of non-free-flowing water bodies, and (4) the outer banks but <u>NOT</u> including the outer banks of irrigation ditches or canals (see BUFFER ZONE RESTRICTIONS section of this label.) Regardless of application method, DO NOT apply or allow this product to drift onto adjacent properties, water bodies, or within the root zone of susceptible trees (note: tree roots on adjacent properties may extend well beyond the property line and into the soil of the treatment site; observe these precautions to avoid impacting trees on adjoining property).

Untreated trees near a treated cut stump may be affected by movement of the herbicide through the root systems. This can happen if the roots are grafted together or if the trees are in a clonal community (common in certain species including cottonwoods, aspens, willows, and honey locust). DO NOT use a cut stump treatment near desirable trees if the possibility of injury or death to these associated non-target trees cannot be tolerated.

INVORA™ VM HERBICIDE may be used for cut stump applications for the control of woody plants. Prepare in water, 6% to 10% solution of INVORA™ VM HERBICIDE with 1% methylated seed oil + organo-silicone surfactant (MSO-OS). A water-soluble dye may be added to the tank to help mark stumps that have been sprayed. See the following table for proper mixing rates based on spray volume desired.

		Desired Vol	Maximum Volume of Spray Solution that Can Be		
		1 gallon	Applied Per Acre		
Product	Rate	Fluid Ounces (Milliliters) of Product to Add to Form Desired Volume			Gallons
	6%	7.6 (227)	38.4 (1135)	76.8 (2271)	6.2
INVORA™ VM HERBICIDE	8%	10.2 (302)	51.2 (1514)	102.4 (3028)	4.6
	10%	12.8 (378)	64 (1892)	128 (3785)	3.7
MSO-OS Adjuvant <sup>b</sup>	1%	1.2 (37)	6.4 (189)	12.8 (378)	See Adjuvant Label

- a. DO NOT apply more than 48 fluid ounces (0.25 pounds acid equivalent of aminocyclopyrachlor and 0.50 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre in a single application. DO NOT apply more than 54 fluid ounces of INVORA™ VM HERBICIDE (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopry) per field acre per year as a result of broadcast and spot applications. To observe this maximum use rate, observe the maximum number of gallons of the spray solution that can be applied per acre.
- b. Include 1% methylated seed oil + organo-silicone surfactant (MSO-OS) in the spray solution.

## **BASAL STEM SPRAY**

Apply the INVORA<sup>TM</sup> VM HERBICIDE solution with a backpack sprayer or equivalent using low pressure and a solid cone nozzle. Adjust the nozzle to a fine cone to direct all of the spray onto the targeted stem. Spray not contacting the stem is wasted spray and should be avoided. Each basal stem should be sprayed on all sides, but not to the point of runoff. Treat from the ground line to a height of 12 to 14 inches.

Basal stem sprays of INVORA™ VM HERBICIDE may be made up to (1) adjacent property lines, (2) water's edge of free-flowing water bodies, (3) water's edge of non-free-flowing water bodies, and (4) the outer banks but <u>NOT</u> including the outer banks of irrigation ditches or canals (see BUFFER ZONE RESTRICTIONS section on this label.) Regardless of application method, DO NOT apply or allow this product to drift onto adjacent properties, water bodies, or within the root zone of susceptible trees (note: tree roots on adjacent properties may extend well beyond the property line and into the soil of the treatment site; observe these precautions to avoid impacting trees on adjoining property).

Untreated trees near a basal-treated plant may be affected by movement of the herbicide through the root systems. This can happen if the roots are grafted together or if the trees are in a clonal community (common in certain species including cottonwoods, aspens, willows, and honey locust). DO NOT use a basal-stem spray treatment near desirable trees if the possibility of injury or death to these associated non-target trees cannot be tolerated.

INVORA™ VM HERBICIDE may be used for basal stem spray applications for the control of susceptible woody plants. Prepare in water, 15% solution of INVORA™ VM HERBICIDE with 1% methylated seed oil + organo-silicone surfactant (MSO-OS). A water-soluble dye may be added to the tank to help mark stems that have been sprayed. See the following table for proper mixing rates based on spray volume desired.

		Desired Volume of IPT <u>Basal Stem</u> Spray Solution			Maximum Volume of Spray Solution that Can Be
		1 gallon 5 gallons 10 gallons			Applied Per Acre
Product	Rate	Fluid Ounces (Milliliters) of Product to Add to Form Desired Volume			Gallons
INVORA™ VM HERBICIDE	15%	19.2 (567) 96 (2838) 192 (5677)			2.4
MSO-OS Adjuvant <sup>b</sup>	1%	1.2 (37)	6.4 (189)	12.8 (378)	See Adjuvant Label

a. DO NOT apply more than 48 fluid ounces (0.25 pounds acid equivalent of aminocyclopyrachlor and 0.50 pounds acid equivalent of triclopyr) of INVORA™ VM HERBICIDE per acre in a single application. DO NOT apply more than 54 fluid ounces of INVORA™ VM HERBICIDE (0.28 pounds acid equivalent of aminocyclopyrachlor and 0.56 pounds acid equivalent of triclopyr) per field acre per year as a result of broadcast and spot applications. To observe this maximum use rate, observe the maximum number of gallons of the spray solution that can be applied per acre.

b. Include 1% methylated seed oil + organo-silicone surfactant (MSO-OS) in the spray solution.

## STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store product in original container only. Store in a cool, dry place.

**PESTICIDE DISPOSAL**: Waste resulting from the use of this product must 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" designation.

Rigid, Non-refillable containers small enough to shake (i.e., with capacities equal to or less than 5 gallons) Non-refillable 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. Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by incineration, or by other procedures approved by state and local authorities.

Rigid Non-refillable containers that are too large to shake (i.e., with capacities greater than 5 gallons)

Non-refillable 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. Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by incineration, 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.

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 Bayer CropScience LP at 1-800-334-7577, day or night.

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## CONDITIONS OF SALE AND LIMITATIONS OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS**: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, plant injury, other property damage, as well as other unintended consequences may result because of factors beyond the control of Bayer CropScience LP. Those factors include, but are not limited to, weather conditions, presence of other materials or the manner of use or application. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE LP MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience LP is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE LP DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

**LIMITATIONS OF LIABILITY:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE LP'S ELECTION, THE REPLACEMENT OF PRODUCT.

#### PRODUCED FOR



Bayer Environmental Science A Division of Bayer CropScience LP 5000 CentreGreen Way, Suite 400 Cary, NC 27513

INVORA HERBICIDE (PENDING) 10/09/2017, 10/11/2017, 10/24/2017, 10/30/2017, 10/31/2017, 08/13/2019, 08/14/2019, 08/15/2019, 10/22/2019, 10/24/2019, 10/31/2019, 11/01/2019, 11/05/2019, 11/14/2019, 12/09/2019, 12/10/2019, 12/12/2019, 01/07/2020, 01/10/2020, 01/13/2020, 01/24/2020, 01/27/2020, 01/28/2020, 01/31/2020

## [Optional Marketing Claims] [Images]





- Apply to **privately-owned <u>NON-HAYED</u>** Rangeland, and **privately-owned <u>NON-HAYED</u>** perennial grazing lands managed as rangeland (including use on native and introduced species)
  - **DO NOT** apply to hay, silage, or green chop fields
- <u>DO NOT</u> remove herbaceous (non-woody) vegetation for 2 years following treatment







- <u>NOT</u> for use on fields where animals are confined and manure is collected
- MANURE MUST STAY on treatment site, including manure collected during clean-out period





• <u>DO NOT</u> compost any vegetation or manure that results for a period of 2 years following application





• <u>DO NOT</u> remove treated woody plants (brush). Treated woody plants (brush) must degrade on site





• **CLEAN-OUT ANIMALS** for 3 days before transport