

1381-202

7/27/2012

1/26



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D C 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Alice Walker Ph D  
Winfield Solutions LLC  
P O Box 64589  
St Paul MN 55164 0589

JUL 27 2012

Subject Label Notification Per PR Notice 98 10  
Brash  
EPA Reg No 1381 202  
Date Submitted May 21 2012

Dear Ms Walker

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98 10 dated May 21 2012 for the product referenced above The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98 10 and finds that the action requested falls within the scope of PRN 98 10 The label submitted with the application has been stamped Notification and will be placed in our records

If you have any questions regarding this letter please contact Jasmine Branch at (703) 347 0351 or [branch.jasmine@epa.gov](mailto:branch.jasmine@epa.gov)

Sincerely

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

**EPA**

United States  
**Environmental Protection Agency**

Washington DC 20460

- Registration**  
 **Amendment**  
 **Other**

OPP Identifier Number

**Application for Pesticide Section I**

1 Company/Product Number 1381 202	2 EPA Product Manager Kathryn Montague	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) Brash	PM# 23	
5 Name and Address of Applicant (Include ZIP Code) Alice Walker Winfield Solutions LLC P O Box 64589 St Paul MN 55164 0589 <input type="checkbox"/> Check if this is a new address	6 Expedited Review In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to  EPA Reg No Product Name	<b>NOTIFICATION</b> <b>JUL 27 2012</b>

**Section II**

Amendment Explain Below  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  Me Too Application

Notification Explain below  Other explain below

**Explanation** Use additional page(s) if necessary (For Section I and Section II)

Notification to correct rates to match 2 4 D RED and competitive labels I believe this notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152 46 and no other changes have been made to the labeling or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to willfully make any false statement to EPA I further understand that if this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 152 46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA

**Section III**

**1 Material This Product Will Be Packaged In**

Child Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <i>Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If Yes Unit Package Wt No Per Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If Yes Package Wt No Per Container	2 Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3 Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4 Size(s) of Retail Container 1 2 5 30 55 gallons	5 Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6 Manner In Which Label Is Affixed To Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other ( self adhesive booklet) <input type="checkbox"/> Paper Glued <input type="checkbox"/> Stenciled			


**Section IV**

**1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)**

Name Alice Walker Ph D	Title Registration Specialist	Telephone No (Include Area Code) 662 562 5995
---------------------------	----------------------------------	--

**Certification**  
 I certify that the statements I have made on this form and all attachments thereto are true accurate and complete I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law

6 Date Application Received  
  
(Stamped)

2 Signature 	3 Title Registration Specialist
4 Typed Name Alice Walker Ph D	5 Date May 21 2012

CERTIFIED MAIL

May 21 2012

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U S Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington DC 20460

Re Brash (EPA Reg No 1381 202)  
Notification of Changes Made to Correct Typographical Errors

Winfield Solutions LLC is working on a sibling label to Brash EPA Reg No 1381 202 Using the Brash label as a guide we have discovered errors on the Brash label that need to be corrected To this end we submit this notification to make the following changes

- P 11 Crop Rotational Restrictions Planting/replanting restrictions for Brash applications of 5 66 pints per acre We believe 5 66 should be changed to 6 pints since the context of this paragraph is *6 pints or less* while the context of the paragraph immediately below is *greater than 6 pints and less than 8 pints* I have also compared Brash to substantially similar labeling Nufarm s Kam baMaster (71368 34) and Albaugh s Range Star (42750 55) and those labels concur
- P 15 Preharvest Applications 1<sup>st</sup> paragraph second sentence Apply up to 2 pints This rate cannot exceed the preharvest maximum application rate below of 1 4 pts
- P 19 CRP Farmstead and Fencerow Restrictions Postemergence – woody plants Maximum of 8 pints/acre per year The RED allows a maximum of 4# ae/A for woody plants or 11 pts formulated product

To assist your review of this amendment I have enclosed highlighted pages 11 15 and 19 with strike throughs and new text highlighted and a clean version of the complete label The obligatory application form is also included

I believe this notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152 46 and no other changes have been made to the labeling or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to willfully make any false statement to EPA I further understand that if this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 152 46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA

Should any questions arise during your review please do not hesitate to call

Sincerely



Alice Walker Ph D  
Registration Specialist

Enclosures

4/26

NOTIFICATION

JUL 27 2012

# BRASH®

**For Use on Conservation Reserve Program Land Fallow Systems (Between Crop Applications)  
General Farmstead Sorghum Grass (Hay or Silage) Pastures Rangeland Rights of Way  
Sugarcane and Wheat**

**ACTIVE INGREDIENTS**

Dimethylamine salt of dicamba (3 6 dichloro <u>o</u> anisic acid)	12 4%
Dimethylamine salt of 2 4 dichlorophenoxyacetic acid	35 7%
<b>OTHER INGREDIENTS</b>	<b>51 9%</b>
<b>TOTAL</b>	<b>100 0%</b>

This product contains 10 3% 3 6 dichloro o anisic acid (dicamba) or 1 pound per gallon (120 g/L)  
This product contains 29 6% 2 4 dichlorophenoxyacetic acid (2 4 D) or 2 87 pounds per gallon  
(344 g/L) Isomer specific by AOAC method 978 05 15<sup>th</sup> Edition

**SHAKE WELL BEFORE USING  
KEEP OUT OF REACH OF CHILDREN**

## 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 )**

**FIRST AID**

<b>If in eyes</b>	<ul style="list-style-type: none"> <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>
<b>If swallowed</b>	<ul style="list-style-type: none"> <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>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing</li> <li>• Rinse skin immediately with plenty of water for 15 20 minutes</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
<b>If Inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air If person is not breathing call 911 or an ambulance then give artificial respiration preferably mouth to mouth if possible</li> </ul>

Have the product container or label with you when calling a poison control center or doctor or going for treatment You may also contact 1 877 824 7452 for emergency medical treatment information

**NOTE TO PHYSICIAN**

Probable mucosal damage may contraindicate the use of gastric lavage

See inside booklet for additional Precautionary Statements

EPA Reg No 1381 202

EPA Est No

Distributed By  
Winfield Solutions LLC  
P O Box 64589  
St Paul MN 55164 0089

NET CONTENTS \_\_\_\_\_  
LOT NO \_\_\_\_\_  
1/0521/2

# WINFIELD™

# AGRISOLUTIONS

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER**

Corrosive Causes irreversible eye damage Do not get in eyes or on clothing Harmful if swallowed or absorbed through skin Avoid contact with skin

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Some of the materials that are chemical resistant to this product are butyl rubber  $\geq 14$  mils or natural rubber  $\geq 14$  mils or neoprene rubber  $\geq 14$  mils or nitrile rubber  $\geq 14$  mils If you want more options follow the instructions for category A on an EPA chemical resistance category selection chart

All mixers loaders applicators flaggers and other handlers must wear

Long sleeved shirt and long pants

Chemical resistant gloves (except for applicators using groundboom equipment pilots and flaggers)

Shoes plus socks

Protective eyewear

Chemical resistant apron when mixing or loading cleaning up spills or equipment or otherwise exposed to the concentrate

See engineering controls for additional requirements and exceptions

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate Do not reuse them

Follow manufacturer's instructions for cleaning/maintaining PPE If no such instructions for washables exist use detergent and hot water Keep and wash PPE separately from other laundry After each day of use clothing or PPE must not be reused until it has been cleaned

**Engineering Controls Statements**

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

Pilots must use cockpits in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)]

**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

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and aquatic invertebrates Do not apply directly to water to areas where surface water is present or to intertidal areas below the mean high water mark Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas Do not contaminate water when disposing of equipment washwaters or rinsate

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

may result in groundwater contamination Application around a cistern or well may result in contamination of drinking water or groundwater

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

#### **DIRECTIONS FOR USE**

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

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

Do not apply this product through any type of irrigation system

Use of this product in certain portions of California Oregon and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition et al v EP C01 0132C (W D WA) For further information please refer to <http://www.epa.gov/espp/litstatus/wtc/index.htm>

#### **AGRICULTURAL USE REQUIREMENTS**

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

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants soil or water is coveralls worn over short sleeve shirt and short pants chemical resistant gloves made of any waterproof material chemical resistant headgear for overhead exposure chemical resistant footwear plus socks and protective eyewear

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas

#### **STORAGE AND DISPOSAL**

Do not contaminate water food or feed by storage or disposal

##### **PESTICIDE STORAGE**

Store in original container in a well ventilated area separately from fertilizer feed and foodstuffs Avoid cross contamination with other pesticides Spillage or leakage should be contained and absorbed with clay granules sawdust or equivalent material for disposal

##### **PESTICIDE DISPOSAL**

Pesticide wastes are toxic Triple rinse pesticide from containers and use rinsates in the pesticide application 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 EPA Regional Office for guidance

**CONTAINER DISPOSAL** Use label language appropriate for container size and type

**Nonrefillable container** Do not reuse or refill this container Clean container promptly after emptying

7/26

**Nonrefillable container equal to or less than 5 gallons** 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 ¼ 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 Offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities such as burning of plastic containers If burned stay out of smoke

**Nonrefillable container greater than 5 gallons** Triple rinse as follows Empty the remaining contents into application equipment or a mix tank Fill the container ¼ full with water Replace and tighten closures Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds Stand the container on its end and tip it back and forth several times Turn the container over onto its other end and tip it back and forth several times Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal Repeat this procedure two more times Offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities such as burning of plastic containers If burned stay out of smoke

**Refillable container** Refill this container with pesticide only Do not reuse this container for any other purpose Cleaning the container before final disposal is the responsibility of the person disposing of the container Cleaning before refilling is the responsibility of the refiller To clean the container before final disposal empty the remaining contents from this container into application equipment or mix tank Fill the container about 10 percent full with water Agitate vigorously or recirculate water with the pump for 2 minutes Pour or pump rinsate into application equipment or rinsate collection system Repeat this rinsing procedure two more times Offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities such as burning of plastic containers If burned stay out of smoke

**FOR CHEMICAL EMERGENCY Spill leak fire exposure or accident call  
CHEMTREC 1 800-424 9300**

#### PRODUCT INFORMATION

BRASH® is a selective postemergence herbicide for controlling a wide spectrum of annual biennial and perennial broadleaf weeds and brush in grass forages and selected row crops BRASH® may be used in/on Conservation Reserve Program Land Fallow Systems (Between Crop Applications) General Farmstead Grain Sorghum Grass (Hay or Silage) Pastures Rangeland Sugarcane and Wheat

These crops are considered Food/Feed crops only when harvested grazed or foraged Otherwise they are considered as non Food/Feed uses

**MODE OF ACTION** BRASH® contains dicamba and 2,4-D as the active ingredients BRASH® is readily absorbed by plants through shoot and root uptake translocates throughout the plant's system and accumulates in areas of active growth BRASH® interferes with the plant's growth hormones (auxins) resulting in death of many broadleaf weeds

**SPRAY EQUIPMENT CLEANING** Spray equipment may be cleaned by using a strong detergent or commercial sprayer cleaner according to the manufacturer's directions and then triple rinsing the equipment before and after applying this product

#### APPLICATION INSTRUCTIONS

Apply BRASH® at the specified rates and growth stages in the **Annual Weeds** and the **Biennial and Perennial Weeds** rate tables unless instructed differently in the **Food/Feed Crop Specific Information** or **Non Food/Feed Use Specific Information** sections of this label Make applications of BRASH® to actively growing weeds using aerial broadcast band or spot spray applications BRASH® may be applied using water or sprayable fluid fertilizer as a carrier For preplant or pre emergence uses sprayable fluid fertilizer may be used as the carrier for all crops listed on this label Postemergence applications with sprayable fluid fertilizer may be made on pasture hayland or wheat crops only

The most effective application rate and timing varies based on the target weed species. In mixed weed populations, the correct rate is determined by the weed species requiring the highest rate. Inadequate control may be observed if application is delayed since weeds may exceed the maximum size stated on this label.

**IRRIGATION** In irrigated areas, it may be necessary to irrigate before application of BRASH® to ensure active weed growth.

**SPRAY COVERAGE** Ensure weeds are thoroughly covered with spray. Dense leaf canopies may shield smaller weeds and prevent adequate coverage.

### **SPRAY DRIFT MANAGEMENT**

A variety of factors including weather conditions (e.g. wind direction, wind speed, temperature, and relative humidity) and method of application (e.g. ground, aerial, airblast, chemigation) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

#### **Droplet Size**

When applying sprays that contain 2,4-D as the sole active ingredient or when applying sprays that contain 2,4-D mixed with active ingredients that require a coarse or coarser spray, apply only as a coarse or coarser spray (ASAE standard 572) or a volume mean diameter of 385 microns or greater for spinning atomizer nozzles.

When applying sprays that contain 2,4-D mixed with other active ingredients that require a medium or more fine spray, apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

#### **Wind Speed**

Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for non-target species, non-target crops) within 250 feet downwind. If applying a medium spray, leave one swath unsprayed at the downwind edge of the treated field.

#### **Temperature Inversions**

If applying at wind speeds less than 3 mph, the applicator must determine if

- a) conditions of temperature inversion exist, or
- b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

#### **Susceptible Plants**

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use, or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. These plants are most sensitive to BRASH® during their development or growing stage. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants. Agriculturally approved drift-reducing additives may be used. Do not use aerial equipment to apply BRASH® when sensitive crops and plants are growing in the vicinity of area to be treated. Do not treat areas where either possible downward movement into the soil or surface washing may cause contact of BRASH® with the roots of desirable plants such as trees and shrubs.

#### **Other State and Local Requirements**

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.



**Equipment**

All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates

*Additional requirements for aerial applications*

The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter. Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety. This requirement does not apply to forestry or rights of way applications.

When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this by adjusting the path of the aircraft upwind.

*Additional requirements for ground boom application*

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

**AERIAL APPLICATION METHODS AND EQUIPMENT**

**Water Volume** Use 3-10 gallons of water per acre. Use the higher spray volume when treating dense or tall vegetation.

**GROUND APPLICATION (BANDING)**

When applying BRASH® by banding, determine the amount of herbicide and water volume needed using the following formula:

$$\frac{\text{Band width in inches}}{\text{Row width in inches}} \times \text{Broadcast rate per acre} = \text{Banding herbicide rate per acre}$$

$$\frac{\text{Band width in inches}}{\text{Row width in inches}} \times \text{Broadcast volume per acre} = \text{Banding water volume per acre}$$

**GROUND APPLICATION (BROADCAST)**

For optimal performance, use 5-40 gallons of spray solution per broadcast acre. Use the higher spray volume when treating dense or tall vegetation.

**SPOT OR SMALL AREA APPLICATION**

BRASH® may be applied to individual clumps or small areas (SPOT TREATMENT) of undesirable vegetation using handgun or similar types of application equipment. Apply diluted sprays to allow complete wetting (up to runoff) of foliage and stems. For knapsack or other small capacity sprayers, utilize the table below to calculate material needed. (The table below is based on the assumption that the spot treatment rate equates to 60 gallons per acre on the broadcast basis.)

**Knapsack Sprayer Dilution Instructions**

Sprayer Capacity (Gallons of water)	Fluid Ounces of BRASH® to add per filled tank
1.0 gallon	1.0 oz
2.5 gallons	2.5 oz
3.0 gallons	3.0 oz
5.0 gallons	5.0 oz

The addition of a surfactant can help improve control. Add ½% (0.005) by volume. For example, 5 gallons (40 pt/640 fl oz) of herbicide solution would require 0.2 pt (3.2 fl oz) of surfactant.

1 fluid ounce = 2 tablespoons and 1 cup (liquid) = 16 tablespoons

**ANNUAL WEEDS**

**Application Rate and Timing**

Weeds Controlled (including ALS and triazine resistant)	BRASH® Rate Per Acre (according to weed growth stage)					
	0.5 pint	1 pint	1.5 pints	2 pints	3 pints	4 pints
Beebalm Spotted				pre bloom	post bloom	
Broomweed	1.3	3 branching		branching		after branching
Buckwheat Wild		1.6				
Buffalobur				1.6		flowering
Burdock		pre flower				
Buttercup		pre flower		early bloom	late bloom	
Chickweed Common		seedling	1.3			
Cockle Cow		< 3				
Cocklebur Common		1.6	6.12	12.18		
Coreopsis Plains		1.6				
Croton Woolly	1.4	4.12	12.30			
Devilsclaw				< 8		
Dogfennel				10.15		
Evening Primrose		< 2		2.6		
Falseflax Smallseed		< 2				
Fleabane Annual		1.4	4.8	8		
Flixweed		< 3				
Henbit			pre flower		flower	
Knotweed Spp		< 3 runners		> 3 runners		actively growing
Kochia		1.6	6.10	10.20		actively growing
Lambsquarters Common		1.6	6.10	10.20		actively growing
Mallow Common		< 3				
Morningglory Ivyleaf		pre flower				
Tall		pre flower		post flower		
Mustards Annual		rosette		early bolt		
Tansy		< 3				
Pennycress Field				rosette		
Pepperweed Virginia			1.3	3.6	after branching	
Pigweed Prostrate		< 3				
Redroot		< 3	3.10			
Smooth		< 3				
Tumble		< 3		mature		
Poorjoe		prior to flower				actively growing
Purslane Common		< 3	3.8			
Ragweed Common Lanceleaf Western	1.3	3.6	6.10	> 10		
Sedge <sup>1</sup>				actively growing		
Shepherdspurse		rosette				
Smartweed Pennsylvania		< 4			4.12	
Sneezeweed Bitter		1.4	prior to flower	flower		
Sowthistle		rosette		bolting		
Sunflower		1.3	3.6	6.24		
Thistle Russian				rosette		
Velvetleaf		< 6	6.20	> 20		

<sup>1</sup>For use in non food/feed crop only Adding crop oil concentrate has shown to improve performance on actively growing annual sedge

## BIENNIAL and PERENNIAL WEEDS

## Application Rate and Timing

Weeds Controlled	BRASH <sup>®</sup> Rate Per Acre (according to weed growth stage)					
	0.5 pint	1 pint	1.5 pints	2 pints	3 pints	4 to 5.6 pints
Bindweed Field						actively growing
Bittercress <sup>5</sup>		2-3				
Buckeye species <sup>1</sup>					full leaf	
Bullnettle <sup>2,5</sup>				flower		
Chicory					early bolting	
Clover bur			pre flower			
Dandelion Common		rosette		bolting		
Dewberry Southern <sup>1</sup>						spring or fall
Dock Curly			prior to bolting		after bolting	
Elderberry <sup>2</sup>						actively growing
Goldenrod Missouri				3-15	flower	
Goldenweed Common						actively growing
Groundsel Texas		rosette	post bolting			
Honeysuckle Hairy					spring or fall	
Horsenettle Carolina <sup>1</sup>						flower or berry
Ivy Poison				after bloom		
Knapweed Black <sup>2</sup>						actively growing
Russian <sup>2</sup>						actively growing
Spotted						actively growing
Marshelder <sup>5</sup>				< 12	12 /pre bloom	
Mesquite						45-90 days after bud break
Milkweed <sup>1,5</sup>				pre flower		flower
Nightshade Silverleaf <sup>1</sup>				full flower		
Black <sup>1</sup>				full flower		actively growing
Persimmon Eastern <sup>3</sup>						actively growing
Prickly Lettuce				rosette		actively growing
Rabbitbrush <sup>2</sup>						actively growing
Ragwort Tansy				rosette		actively growing
Redvine <sup>2</sup>						actively growing
Sagebrush Fringed <sup>2</sup>						actively growing
Smartweed						actively growing
Sorrel Red			rosette	bolting	flower	actively growing
Sowthistle <sup>2</sup>						actively growing
Spurge Leafy <sup>2</sup>						full leaf
Tallow Tree Chinese <sup>4,5,6</sup>						full leaf
Thistle Bull			rosette	bolting		actively growing
Canada <sup>2</sup>						actively growing
Musk				rosette/bolting		
Plumeless			rosette	bolting		
Vetch Hairy		1-4	4-8	8 full flower		
Yankee weed				10-18		rosette
Yellow Starthistle <sup>1</sup>						rosette

Weeds Controlled	BRASH® Rate Per Acre (according to weed growth stage)					
	0.5 pint	1 pint	1.5 pints	2 pints	3 pints	4 to 5.6 pints
<sup>1</sup> May require repeat applications <sup>2</sup> Listed rate provides top growth suppression only <sup>3</sup> For improved root kill of woody species such as mesquite and eastern persimmon spray 4 pints of BRASH® per acre each year for 3 consecutive years For increased control of weeds such as blackberry and dewberry BRASH® may be tank mixed with Ally® herbicide (0.1 to 0.2 ounces per acre) if labeled for the use site <sup>4</sup> A second application may be required the following growing season under dense populations <sup>5</sup> Not for use in California <sup>6</sup> Treat with 4 pints of BRASH® per acre after full leaf but before leaves develop a heavy cuticle (waxy covering) in periods of extreme heat or drought stress						

**ADDITIVES**

For improved burndown of emerged weeds surfactants and/or low use rate of liquid fertilizers (28 0 0 32 0 0) or crop oil concentrate may be used with BRASH® or BRASH® tank mixes applied after weeds have emerged Crop oil concentrate is for non food/feed crop uses only Do not apply to tank mixes that include ammonium sulfate or crop oil concentrate to any food/feed crop use listed on this label For food/feed crop uses do not use liquid fertilizers that contain ammonium sulfate (AMS) as a source of nitrogen as tolerances in commodities derived from the crop may contain residues that exceed established tolerances Consult your local WINFIELD SOLUTIONS LLC representative for recommendations for your area For additional information refer to the **Compatibility Test for Mix Components** section of this label

**Oil Concentrate**

A crop oil concentrate must contain either a petroleum or vegetable oil base and must meet all of the following criteria be nonphytotoxic contain only EPA exempt ingredients provide good mixing quality in the jar test and be successful in local experience

The exact composition of suitable products will vary however vegetable and petroleum oil concentrates should contain emulsifiers to provide good mixing quality Highly refined vegetable oils have proven more satisfactory than unrefined vegetable oils For additional information refer to the **Compatibility Test for Mix Components** section of this label

**Mix Components**

Adjuvants containing crop oil concentrates may be used for preplant pre emergence and between cropping applications Do not use crop oil concentrate for postemergence applications in food/feed crops (i.e sorghum grass (hay or silage) pastures rangeland sugarcane and wheat)

**Nitrogen Source**

**Sprayable Liquid fertilizers** Use one quart of sprayable liquid fertilizers (28 0 0 32 0 0) per acre Do not use brass or aluminum nozzles when spraying fertilizers

**Nonionic Surfactant**

The standard label recommendation is 2.4 pints of an 80% active nonionic spray surfactant per 100 gallons of water For certain weeds use a higher spray surfactant rate When an adjuvant is to be used with this product Winfield Solutions LLC recommends the use of a Chemical Producers and Distributors Association certified adjuvant

**Additive Rate Per Acre**

Additive	Rate Per Acre
Nonionic Surfactant	2.4 pints per 100 gallons
Sprayable liquid fertilizers (28 0 0 32 0 0)	2.4 quarts
Crop Oil Concentrate	1 quart

Refer to the manufacturer's label for specific rates

---

**PRODUCT TANK MIXING INFORMATION**


---

The following products may be tank mixed with BRASH® according to the specific tank mixing instructions in this label and the respective product labels

Aim™ (carfentrazone ethyl)	Gramoxone® Extra (paraquat)
Ally® (metsulfuron methyl)	Harmony® Extra (thifensulfuron + tribenuron methyl)
Amber® (triasulfuron)	Karmex® (diuron)
Asulox® (asulam)	Kerb™ (pronamide)
Atrazine	Laddok® S 12 (bentazon + atrazine)
Albaugh Dicamba DMA Salt or Banvel® (dicamba)	Landmaster® BW (glyphosate + 2 4 D)
Basagran® (bentazon)	MCPA
BROX™ M Herbicide or Bronate® (bromoxynil + MCPA)	Paramount® (quinclorac)
BROX™ 2EC Herbicide or Buctril® (bromoxynil)	Peak® (prosulfuron)
Canvas® (thifensulfuron + tribenuron + metsulfuron)	Permit® (halosulfuron methyl)
Clarity® (dicamba)	Rave™ (dicamba + triasulfuron)
Curtail™ (clorpyralid + 2 4 D)	Gly Star™ Plus or Roundup® Ultra (glyphosate)
Cyclone® (paraquat)	Sencor® (metribuzin)
Dakota® (fenoxaprop p ethyl + MCPA)	Sinbar® (terbacil)
Distinct® (diflufenzopyr)	Stinger™ (clopyralid)
Evik® (ametryn)	Tiller® (fenoxaprop p ethyl + 2 4 D + MCPA)
Express® (thifensulfuron + tribenuron methyl)	Tordon™ (picloram)
Fallow Star™ or Fallowmaster® (glyphosate + dicamba)	Touchdown® (sulfosate)
Finesse® (chlorsulfuron + metsulfuron methyl)	2 4 D
Glean® (chlorsulfuron)	

Refer to the Food/Feed Crop Specific Information section for additional information. Read and follow the applicable **Restrictions and Limitations** and **Directions For Use** on all products involved in tank mixing. The most restrictive labeling applies to tank mixes.

Crop injury, reduced weed control, or physical incompatibility may result when mixing BRASH® with other pesticides (fungicides, herbicides, insecticides, or miticides), additives, or fertilizers. Winfield Solutions LLC does not recommend using tank mixes other than those listed on this labeling. Local agricultural authorities may be a source of information when using tank mix components other than those recommended on this label.

#### Compatibility Test for Mixing Components

Always perform a compatibility test before mixing components. For 20 gallons per acre spray volume, use 3.3 cups (800 mL) of water. For other spray volumes, adjust accordingly. Only use water from the intended source at the source temperature. Add components in the sequence indicated in the **Mixing Order** using 2 teaspoons for each pound or 1 teaspoon for each pint of recommended label rate per acre. Always cap the jar and invert 10 cycles between component additions.

When the components have all been added to the jar, let the solution stand for 15 minutes. Evaluate the solution for uniformity and stability. The spray solution should not have free oil on the surface, nor fine particles that precipitate to the bottom, nor thick (clabbered) texture. If the spray solution is not compatible, repeat the compatibility test with the addition of a suitable compatibility agent. If the solution is then compatible, use the compatibility agent as directed on its label. If the solution is still incompatible, do not mix the ingredients in the same tank.

### Mixing Order

If an inductor is used rinse it thoroughly after each component has been added. Maintain constant agitation during application.

- 1 Water Begin by agitating a thoroughly clean sprayer tank half full of clean water
- 2 Agitation – Maintain constant agitation throughout mixing and application
- 3 Products in PVA bags – Place any product contained in water soluble PVA bags into the mixing tank. Wait until all water soluble PVA bags have fully dissolved and the product is evenly mixed in the spray tank before continuing.
- 4 Water dispersible products (such as dry flowables, wettable powders, suspension concentrates, or suspo emulsions)
- 5 Water soluble products (such as BRASH®)
- 6 Emulsifiable concentrates (such as oil concentrate when applicable)
- 7 Water soluble additives (such as liquid fertilizers (28 0 0 32 0 0) when applicable)
- 8 Remaining quantity of water

If sprayable fluid fertilizer is used as the carrier BRASH® must be diluted with a minimum of 5 parts water to 1 part BRASH®. Then add 0.25% volume/volume of a nonionic surfactant to the dilution before adding it to the sprayable fluid fertilizer to reduce the concern for compatibility problems with this mix. Always perform the **Compatibility Test** before mixing into the spray tank. Also when using a sprayable fluid fertilizer as the carrier, any product contained in PVA bags must first be completely dissolved in water before the contents can be added to the fertilizer mix.

---

### RESTRICTIONS AND LIMITATIONS

---

Crop	Livestock Grazing or Feeding <sup>1</sup>	Aircraft Application
Between Crop Applications	Yes	Yes
Pasture Hay Silage	Yes	Yes
Sugarcane	Yes	Yes
Sorghum	Yes	Yes
Wheat	Yes	Yes
<sup>1</sup> Refer to the <b>Food/Feed Crop Specific Information</b> section of this label for grazing and feeding restrictions.		

- **Maximum single application rate** 1 gallon per acre with no more than 2 applications per year
- **Preharvest Interval (PHI)** Refer to the **Food/Feed Crop Specific Information** section of this label
- **Crop Rotational Restrictions**  
The interval between application and planting rotational crop is provided below. Always exclude counting days when the ground is frozen. Planting at intervals less than specified below may result in crop injury. Moisture is essential for the degradation of this herbicide in soil. If dry weather prevails, use cultivation to allow herbicide contact with moist soil.
  - **Planting/replanting restrictions for BRASH® applications of 6 pints per acre or less** No rotational cropping restrictions apply at 120 days or more following application. Additionally, for annual crop uses in this label including sorghum, follow the preplant use directions in the **Food/Feed Crop Specific Information** section of this label. For barley, oat, wheat, and other grass seedlings, the interval between application and planting is 10 days per pint per acre.

- **Planting/replanting restrictions for application of more than 6 pints and up to 8 pints of BRASH<sup>®</sup> per acre** Corn sorghum cotton (east of the Rocky Mountains) and all other crops grown in areas with 30 or more of annual rainfall may be planted 120 days or more after application Barley oat wheat and other grass seedlings may be planted if the interval from application to planting is 10 days per pint per acre east of the Mississippi River and 15 days per pint per acre west of the Mississippi River For all other crops in areas with less than 30 of annual rainfall the interval between application and planting is 180 days or more
- **Rainfast period** The effectiveness of BRASH<sup>®</sup> may be reduced if rainfall or irrigation occurs within 4 hours after postemergence applications
- **Stress** Unsatisfactory control may result if BRASH<sup>®</sup> is applied to crops under stress such as stress due to lack of moisture hail damage flooding herbicide injury mechanical injury or widely fluctuating temperatures

Do not apply to crops that exhibit injury (leaf phytotoxicity or plant stunting) produced by any other prior herbicide applications because this injury may be enhanced or prolonged by applying BRASH<sup>®</sup>

- Do not apply through any type of irrigation equipment Do not contaminate irrigation ditches or water used for domestic purposes
- This product cannot be used to formulate or reformulate any other pesticide product

---

### FOOD/FEED CROP SPECIFIC INFORMATION

---

#### Pastures, Rangeland and Grass (Hay, Silage)

BRASH<sup>®</sup> is recommended for use for pasture (including pasture grown for hay) rangeland and grass grown for hay or silage

Refer to the **ANNUAL WEEDS** and **BIENNIAL and PERENNIAL WEEDS** Application Rate and Timing tables for rate selection based on targeted weed or brush species Some weed species will require tank mixes for adequate control Rates above 4 pints of BRASH<sup>®</sup> per acre are for spot treatments only Retreatments may be made as needed however do not exceed a total of 8 pints of BRASH<sup>®</sup> per treated acre during a growing season

BRASH<sup>®</sup> uses described in this situation also pertain to small grains (such as barley corn forage sorghum oats rye sudangrass or wheat) grown for pasture hay and silage only Newly seeded areas including small grains grown for pasture or hay may be injured if rates of BRASH<sup>®</sup> greater than 2 pints per acre are applied

In newly established hybrid Bermudagrass Pangolagrass and stargrasses (*Cynodon spp*) use 1 2 quarts of BRASH<sup>®</sup> per acre to control or suppress weeds after planting vegetative propogules (stolens) of hybrid bermudagrasses In addition to the weeds listed in the ANNUAL and BIENNIAL and PERENNIAL WEEDS tables this rate of BRASH<sup>®</sup> will control or suppress annual sedges broadleaf signalgrass crabgrass and goosegrass Best results will be obtained if BRASH<sup>®</sup> is applied at the germinating stage of weeds Under favorable conditions this is usually 7 10 days after planting these grasses Reduced control can be expected if weeds are allowed to reach 1 in height before application or if germination of weeds occurs 10 days after application

Do not use on bentgrass susceptible grass pastures (such as carpetgrass buffalograss or St Augustine grass) lespedeza wild winter peas vetch clover and alfalfa pastures as injury will occur

When perennial weeds are reaching maturity mowing and allowing some regrowth will enhance control Difficult to control weeds and brush may require repeat application

For pasture renovations wait 3 weeks per quart per acre of BRASH® used before interseeding or injury may occur

If grasses are grown for seed or for seed down purposes do not apply after grass reaches the joint stage

**Grazing and feeding restrictions Non lactating animals**

Remove meat animals from treated areas 30 days prior to slaughter There is no waiting period between treatment and grazing for non lactating animals

**Grazing and feeding restrictions Lactating animals**

Do not graze lactating dairy animals within 7 days of treatment

**Dry hay and silage** Treated grasses may be harvested for dry hay or silage but do not harvest within 37 days of treatment

**Pasture and Rangeland Tank Mixes** BRASH® may be applied in tank mixes with one or more of the following herbicides Ally® Amber® Albaugh Dicamba DMA Salt or Banvel® Clarity® Rave™

**Pasture and Rangeland Restrictions**

Do not cut forage for hay within 7 days of application

**Pasture and Rangeland Restrictions Postemergence**

For susceptible annual and biennial broadleaf weeds Use 2.78 pints product/acre per application

For moderately susceptible biennial and perennial broadleaf weeds Use 2.78 – 5.6 pints product/acre per application

For difficult to control weeds and woody plants Use 5.6 pints product/acre per application

Spot Treatment Use 5.6 pints product/acre

Maximum of two applications per year

Maximum of 11 pints product/acre per year

Minimum of 30 days between applications

If grass is to be cut for hay Agricultural Use Requirements for Worker Protection Standard are applicable

## SORGHUM

**Rates and Timings**

Apply 1 pint of BRASH® per acre to sorghum in the 3-5 leaf stage (4-8" tall) Apply BRASH® when weeds are small (less than 3" tall) for best performance

Applications of BRASH® to sorghum during periods of rapid growth may result in temporary leaning of plants or rolling of leaves These effects are usually outgrown within 10 to 14 days Sorghum growing under conditions of stress such as high moisture low fertility and abnormal temperature may be more sensitive to applications of BRASH®

Do not graze or feed treated sorghum forage or silage prior to mature grain stage If sorghum is grown for pasture hay or silage refer to the **Pasture and Rangeland** section of the **Food/Feed Crop Specific Information** section of this label for livestock grazing and feeding restrictions

**Sorghum Restrictions**

Do not apply BRASH® to sorghum grown for seed production



The preharvest interval (PHI) is 30 days

Do not permit meat or dairy animals to consume treated crop as fodder or forage for 30 days following application

#### **Sorghum Restrictions Postemergence**

Do not use surfactants or oils with postemergence applications of BRASH® on sorghum crops

Do not use BRASH® if the potential for sorghum injury is not acceptable

Limited to 1 application per crop cycle

Maximum of 2.78 pints product/acre per application

**SORGHUM Tank Mixes** BRASH® may be applied in tank mixes with one or more of the following herbicides: Atrazine, Basagran®, BROX™ 2EC Herbicide or Buctril®, Laddok®, S 12, Paramount®, Peak® or Permit®

### **SUGARCANE**

Applications of BRASH® can be made any time after the weeds have emerged and are actively growing but prior to the close in stage of sugarcane. When possible, direct the spray beneath the sugarcane canopy in order to minimize the likelihood of crop injury. The use of directed sprays will also aid in maximizing spray coverage of weed foliage. Application rates and timing are given below. Use the higher level of listed rate ranges when treating dense vegetative growth.

- For control of listed ANNUAL broadleaf weeds, apply 2 pints of BRASH® per treated acre
- For suppression of listed PERENNIALS, apply 1 – 5.6 pints of BRASH® per treated acre

#### **Sugarcane Restrictions**

Do not harvest cane prior to crop maturity

Do not apply more than 11 pints/acre per crop cycle

#### **Sugarcane Restrictions Preemergence**

Limited to one application per crop cycle

Maximum of 5.6 pints product/acre per application

#### **Sugarcane Restrictions Postemergence**

Limited to one application per crop cycle

Maximum of 5.6 pints product/acre per application

**SUGARCANE Tank Mixes** BRASH® may be tank mixed with one or more of the following herbicides: Asulox®, Atrazine, Evik®, Sencor®, or Sinbar®

### **WHEAT**

#### **(Fall and Spring seeded)**

If small grains are grown for pasture or hay only, refer to the **Pastures, Rangeland and Grass (Hay Silage)** section of this label.

Do not graze or harvest for livestock feed prior to crop maturity. Do not use BRASH® in wheat underseeded to legumes.

**EARLY SEASON APPLICATIONS**

Apply 0.5-1 pint of BRASH<sup>®</sup> per acre to wheat unless using one of the wheat specific programs below

Early season applications to spring seeded wheat must be made after tillering and before wheat reaches the 6 leaf stage

Early season applications to fall seeded wheat must be made after tillering and prior to the jointing stage. Care should be taken in staging early developing wheat varieties such as TAM 107, Madison or Wakefield to be certain that the application occurs prior to the jointing stage.

**SPECIFIC USE PROGRAMS FOR FALL SEEDED WHEAT ONLY**

Up to 1.33 pints of BRASH<sup>®</sup> per acre may be applied on fall seeded wheat after the wheat begins to tiller for suppression of perennial weeds such as field bindweed. Applications may be made in the fall following a frost but before a killing freeze. Periods of extending stresses such as cold and wet weather may enhance the possibility of crop injury. For fall applications only, do not use if the potential for crop injury is not acceptable.

**PREHARVEST APPLICATIONS**

BRASH<sup>®</sup> can be used to control weeds that may interfere with harvest of wheat. Apply up to 1.4 pints of BRASH<sup>®</sup> per acre as a broadcast or spot treatment to annual broadleaf weeds when wheat is in the hard dough stage and the green color is gone from the nodes (joints) of the stem. Best results will be obtained if application can be made when weeds are actively growing but before weeds canopy.

Do not use preharvest treated wheat for seed unless a germination test is performed on the seed with an acceptable result of 95% germination or better.

For control of additional broadleaf weeds or grasses, BRASH<sup>®</sup> may be tank mixed with other herbicides such as Ally<sup>®</sup>, Gly Star<sup>™</sup> Plus or Roundup<sup>®</sup> Ultra that are registered for preharvest use in wheat.

Preharvest use of BRASH<sup>®</sup> is not registered for use in California.

**Wheat Restrictions**

Do not graze or harvest for livestock feed prior to crop maturity.

Do not use Brash<sup>®</sup> in wheat underseeded with legumes.

The preharvest interval (PHI) is 14 days.

Limited to 4.9 pints product/acre per crop cycle.

**Wheat Restrictions Postemergence**

Limited to one postemergence application per crop cycle.

Maximum of 3.5 pints product per application.

**Wheat Restrictions Preharvest**

Limited to one postemergence application per crop cycle.

Maximum of 1.4 pints product per application.

19/26

**WHEAT Tank Mixes**

For control of grasses or additional broadleaf weeds BRASH® may be tank mixed with the herbicides listed in the table below. Read and follow the label of each tank mix product used for precautionary statements, directions for use, weeds controlled, geographic and other restrictions.

Tank Mix Partner	Rate per Acre
Aim™	0.3 ounce
Ally®	0.05 to 0.1 ounce <sup>1</sup>
Amber®	0.14 to 0.28 ounce <sup>1</sup>
BROX™ M Herbicide or Bronate®	0.75 to 1.5 pints
BROX™ 2EC Herbicide or Buctril®	1 to 1.5 pints
Canvas®	0.2 to 0.4 ounce <sup>1</sup>
Curtail™	2 to 2.67 pints
Dakota®	16 fluid ounces
Express®	0.083 to 0.167 ounce <sup>1</sup>
Finesse®	0.167 to 0.33 ounce <sup>1</sup>
Glean®	0.167 ounce
Harmony® Extra	0.167 to 0.33 ounce <sup>1</sup>
Karmex® <sup>3</sup>	0.5 to 1.5 pounds
2,4-D amine	4 to 20 fluid ounces <sup>4</sup>
Sencor® (Metribuzin <sup>3</sup> )	0.25 to 0.375 pound a.i.
Peak® <sup>1</sup>	0.25 to 0.38 ounce
Stinger™	4 – 5.33 fluid ounces
Tiller® <sup>2</sup>	1 to 1.7 pints

<sup>1</sup>Do not use low rates of sulfonylurea herbicides such as Ally®, Amber®, Canvas®, Express®, Finesse®, Glean®, Harmony® Extra and Peak® on more mature weeds or on dense vegetative growth.

<sup>2</sup>Do not use BRASH® as a tank mix treatment with Dakota® or Tiller® in Durum wheat. Do not tank mix Tiller® if wild oat is the target weed.

<sup>3</sup>Tank mixes with Karmex® and metribuzin are for use in fall-seeded wheat only.

<sup>4</sup>BRASH® contains 0.36 pounds a.e. of 2,4-D per pint. When tank mixing with 2,4-D, do not exceed a combined total of 1.0 pound a.e. per acre of 2,4-D and do not exceed 0.5 pound a.e. of 2,4-D unless injury to wheat is acceptable.

---

**BETWEEN CROP APPLICATIONS CONSERVATION RESERVE PROGRAMS GENERAL FARMSTEAD AND FALLOW SYSTEMS**

---

These uses are considered Food/Feed Crops when harvested, grazed, or foraged. Refer to the **ADDITIVES** section for information on adjuvant restrictions and the **NON FOOD/FEED USE (LAND NOT HARVESTED, GRAZED OR FORAGED) – SPECIFIC INFORMATION** section for specific use directions.

**Restrictions**

Plant only labeled crops within 29 days following application.

Limited to 2 applications per year.

Maximum of 5.6 pints product/acre per application.

Minimum of 30 days between applications.

---

**NON FOOD/FÉED USE (LAND NOT HARVESTED GRAZED OR FORAGED) – SPECIFIC INFORMATION**

---

**Between Crop Applications**

**PREPLANT DIRECTIONS (POSTHARVEST FALLOW CROP STUBBLE SET ASIDE) FOR BROADLEAF WEED CONTROL**

BRASH® can be applied either postharvest in the fall spring or summer during the fallow period or to crop stubble/set aside acres Apply BRASH® as a broadcast or spot treatment to emerged and actively growing weeds after crop harvest (postharvest) and before a killing frost or in the fallow cropland or crop stubble the following spring or summer

Refer to the **Crop Rotational Restrictions** and **General Restrictions and Limitations** for the recommended interval between application and planting to prevent crop injury

**Rates and Timings**

Apply 0.5-6 pints of BRASH® per acre Refer to the **ANNUAL WEEDS** and **BIENNIAL AND PERENNIAL WEEDS Application Rate and Timing** tables to determine the use rates for specific targeted weed species Retreatments may be made as needed however do not exceed a total of 8 pints of BRASH® per treated acre during a growing season For best performance apply BRASH® when annual weeds are less than 6" tall when biennial weeds are in the rosette stage and to perennial weed regrowth in late summer or fall following a mowing or tillage treatment The most effective control of upright perennial broadleaf weeds such as Canada thistle and Jerusalem artichoke occurs if BRASH® is applied when the majority of weeds have at least 4-6" of regrowth or for weeds such as field bindweed and hedge bindweed that are in or beyond the full bloom stage

Avoid disturbing treated areas following application Treatments may not kill weeds that develop from seed or underground plant parts such as rhizomes or bulblets after the effective period for BRASH® For seedling control a follow up program or other cultural practices could be instituted

**Fallowland (crop stubble on idle land or postharvest to crops or between crops) Restrictions**

Plant only labeled crops within 29 days following application

Limited to 2 applications per year

Maximum of 5.6 pints product/acre per application

Minimum of 30 days between application

**Between Crop Tank Mixes**

Apply 0.5-2 pints of BRASH® per acre in tank mixes with one or more of the following herbicides for control of annual weeds or 2-8 pints of BRASH® per acre for control of biennial and perennial weeds

Aim™	Glyphosate
Ally®	Gramoxone® Extra
Amber®	Kerb™
Atrazine	Landmaster® BW
Curtail™	Paramount®
Cyclone®	Sencor®
Distinct®	Tordon™ 22K
Fallow Star™	Touchdown®
Fallowmaster®	2,4-D
Finesse®	

**CONSERVATION RESERVE PROGRAMS AND GENERAL FARMSTEAD**

BRASH® is recommended for use for Conservation Reserve Programs general farmstead (non cropland only) weed and brush control or use in State Recognized Noxious Weed areas (non cropland areas)

Refer to the **ANNUAL WEEDS** and **BIENNIAL AND PERRENIAL WEEDS Application Rate and Timing** tables for rate selection based on targeted weed or brush species Some weed species will require tank mixes for adequate control

Rates above 4 pints of BRASH® per acre are for spot treatments only Do not exceed a total of 8 pints of BRASH® per treated acre during a growing season

**Grasses in Conservation Reserve Program Areas**

**Annual Broadleaf Weeds** – Apply when weeds are actively growing Use higher rates on older weeds Excessive injury may result if applied to young grasses with fewer than 6 leaves or prior to grasses being well established

**Biennial and Perennial Broadleaf Weeds** – BRASH® may be used to suppress or control biennial and perennial broadleaf weeds in established grasses Apply to actively growing weeds Treat biennial weeds when they are in the seedling to rosette stage and before flower stalks become apparent Treat perennial weeds in the bud to bloom stage

**Grasses in Conservation Reserve Program Areas Restrictions**

The preharvest interval (PHI) is 7 days (cut forage for hay)

Postemergence

Limited to 2 applications per year

Maximum of 5.6 pints product/acre per application

Minimum of 30 days between application

If grass is to be cut for hay Agricultural Use Requirements for the Worker Protection Standard are applicable

For program lands such as Conservation Reserve Program consult program rules to determine whether grass or hay may be used The more restrictive requirements of the program rules or this label must be followed

**Farmstead and Fencerow Treatment**

**Application Instructions**

BRASH® may be applied using water or oil and water emulsions in spot application to control undesirable vegetation using handgun or similar types of application equipment In addition to weed species listed in the **ANNUAL WEEDS** and **BIENNIAL AND PERRENIAL WEEDS Application Rate and Timing** tables these treatments may be used to control or suppress woody plant species listed below

The following list of trees and vines can be controlled on farmsteads and fencerows as foliar basal or cut surface treatments

Alder	Dogwood	Kudzu	Rose McCartney
Ash	Elm	Locust Black	Rose Multiflora
Aspen	Grape	Maple	Sagebrush Fringe
Basswood	Greenbriar	Mesquite	Sassafras
Beech	Hawthorn (Thornapple)	Oak	Spruce
Blackberry	Hemlock	Oak Poison	Sumac
Blackgum	Hickory	Olive Russian	Sweetgum

Cedar	Honeylocust	Persimmon Eastern	Sycamore
Cherry	Honeysuckle	Pine	Tarbrush
Chinquapin	Hornbeam	Plum Sand (Wild Plum)	Willow
Cottonwood	Huckleberry	Poplar	Witchhazel
Creosotebush	Huisache	Rabbitbrush	Yaupon
Dewberry	Ivy Poison	Redcedar Eastern	Yucca

To prepare oil and water emulsions mix in the order and proportions indicated below. The solution should remain milky colored without an oily layer on top when under agitation. If an oily layer forms increase the amount of emulsifier or change to a more effective emulsifier.

Do not exceed 40 gallons of spray solution per treated acre per application. Forty gallons of spray solution contains 1.0 lb a.e. dicamba and 2.87 lb a.e. 2,4-D. Spray individual plants to wet. Do not allow this spray mixture to come into contact with desirable vegetation.

To control brush, briars, and weeds along fencerows surrounding pasture and ranch lands and fallow fields, use a tank mix of 2.5% BRASH<sup>®</sup>, 87.5% water, 10% diesel fuel, and sufficient emulsifier (to mix the diesel and emulsifier). The diesel oil in this tank mix will damage or kill desirable grasses and should not be used in pastures or where damage to desirable species cannot be tolerated.

- 1 **Water** Begin by agitating a thoroughly clean sprayer tank with the desired quantity of clean water. Maintain constant agitation during complete mixing procedure.
- 2 **Emulsifier** Add 0.5% volume to volume.
- 3 **BRASH<sup>®</sup>** Add 2.5 gallons per 100 gallons of total intended solution.
- 4 **Diesel Oil** Add 10 gallons per 100 gallons of total intended solution.

Maintain constant agitation during application. Under good agitation the spray solution should be milky white with no oily layer on top. If an oily layer forms increase the amount of emulsifier or change to a more effective emulsifier.

#### **CRP Farmstead and Fencerow Treatment Restrictions Postemergence – annual and perennial weeds**

Limited to 2 applications per year

Maximum of 5.6 pints product/acre per application

Minimum of 30 days between application

#### **CRP Farmstead and Fencerow Treatment Restrictions Postemergence – woody plants**

Limited to 1 application per year

Maximum of 11 pints/acre per year

Applications to non cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use or for commercial seed production or for research.

#### **For Spraying Foliar Applications**

- 1 Spray when leaves have reached full size but have not hardened due to drought or maturity.
- 2 Spray individual plants to wet with handgun.
- 3 For larger stems (up to 3" in diameter) and hard to control species, direct spray stream to base of stems to wet the stem at soil surface in addition to wetting the foliage.
- 4 Do not apply under drip line of desirable trees or adjacent to desirable vegetation.

### For Dormant Basal Applications

- 1 Increase diesel content to 15% or 15 gallons/100 gallons of total mixture
- 2 Spray in late winter and early spring before plants break dormancy
- 3 Spray the bottom 24" of stem to wet on all sides
- 4 For larger stems (up to 3" in diameter) and hard to kill species direct spray solution to base of stems to wet the soil at the stem/soil junction in addition to wetting the stem
- 5 Do not apply under drip line of desirable trees or adjacent to desirable vegetation

### Cut Surface Treatments

BRASH<sup>®</sup> may be applied as a cut surface treatment for control of unwanted trees and prevention of sprouts of cut trees. Use BRASH<sup>®</sup> in an undiluted state.

**FRILL OR GIRDLE TREATMENTS** Make a continuous cut or a series of overlapping cuts using an axe to girdle tree trunk. Spray or paint cut surface with BRASH<sup>®</sup>.

**STUMP TREATMENTS** Spray or paint freshly cut surface with BRASH<sup>®</sup>. The cambium layer (the layer adjacent to the bark) should be thoroughly wet. Treat stumps within 6 hours after cutting.

### PREPLANT APPLICATION DIRECTIONS FOR BROADLEAF CONTROL IN CROPLAND ROTATED TO WHEAT (POST HARVEST / FALLOW / STUBBLE / SET ASIDE)

#### IMPORTANT

Before using this product read and carefully observe all applicable directions, restrictions, and precautionary statements in this booklet and on the container label.

#### WEEDS CONTROLLED

BRASH<sup>®</sup> when applied at the specified rates will control the ANNUAL and BIENNIAL weeds and suppress the PERENNIAL weeds listed below.

ANNUALS		
Buckwheat Wild	Mustards	Salsify Western
Cockle Cow	Nightshade Black	Smartweed Pennsylvania
Cocklebur Common	Pigweed Redroot (Carelessweed)	Sowthistle Annual
Knotweed	Pigweed Rough	Sunflower
Kochia	Purslane Common	Tansymustard
Lambsquarters Common	Ragweed Common	Thistle Russian
Mallow Common	Sage Lanceleaf	Velvetleaf
BIENNIALS		
Carrot Wild	Starthistle Yellow	Thistle Musk
Ragwort Tansy	Thistle Bull	Thistle Plumeless
PERENNIALS		
Bindweed Field	Dock Curly	Thistle Canada

#### RATES AND TIMINGS

Application may be made to fallow land, wheat stubble, or land to be rotated to wheat. Application should be made to emerged and actively growing weeds. Use higher rate when treating dense vegetative growth. Avoid disturbing treated areas for seven days following application.

Wheat injury may occur if the interval between application and planting is less than 10 days for each pint per acre of BRASH<sup>®</sup> used. Exclude days when ground is frozen.

<b>Weed Type &amp; Stage</b>	<b>Broadcast Rate per Treated Acre Amount</b>
<b>Annual</b>	
Small actively growing (less than 4 inches)	1.0 – 1.5 pints
Established weed growth (greater than 4 inches)	1.5 – 3.0 pints
<b>Biennial</b>	
Rosette diameter (3 inches or less)	1.5 – 2.0 pints
(3 inches or more)	2.0 – 4.0 pints
Greater than 4 inches tillering bolted or flowering	4.0 pints
<b>Perennial</b>	
Suppression or top growth control	2.0 – 4.0 pints
Seasonal Control	4.0 – 5.6 pints

Add 0.5% v/v of an agriculturally approved surfactant to BRASH<sup>®</sup> when used alone or in a tank mix. The addition of a surfactant will enhance spray coverage and the herbicide's penetration of weed foliage.

Retreatments may be made as needed, however, do not exceed a total of 11 pints of BRASH<sup>®</sup> per treated acre.

#### **Cropland Rotated to Wheat (Post Harvest / Fallow / Stubble / Set Aside) Restrictions**

Plant only labeled crops within 29 days following application.

Limited to 2 applications per year.

Maximum of 5.6 pints product/acre per application.

Minimum of 30 days between applications.

#### **TANK MIX TREATMENTS**

BRASH<sup>®</sup> may be tank mixed with one or more of the following herbicides for control of grasses or additional broadleaf weeds. Read and follow the label of each tank mix product used for precautionary statements, directions for use, rates and timings, weeds controlled, geographic or other restrictions. Add 0.5% v/v of an agriculturally approved surfactant to all tank mixes.

<b>Herbicide</b>	<b>Rate per Treated Acre (lb ai)</b>
Atrazine	1/2 to 3.0
Chlorsulfuron (Glean <sup>®</sup> )	0.016 to 0.024
Glyphosate (Gly Star <sup>™</sup> Original or Roundup <sup>®</sup> )	1/4 to 2.0
Metribuzin	1/3 to 3/4
Paraquat	1/2 to 1.0

#### **RIGHTS OF WAY (Roadways, Utility, Railroad Highway, Pipeline)**

When used as directed, BRASH<sup>®</sup> will control or suppress many herbaceous broadleaf weeds (annual, biennial, and perennial) as well as many unwanted woody plant and vine species. Regardless of the species to be controlled, spray volumes should be high enough to allow for good spray coverage. Make applications when weeds and brush are actively growing.



Refer to the **ANNUAL WEEDS** and **BIENNIAL AND PERENNIAL WEEDS Application Rate and Timing** tables for rate selection based on targeted weed or brush species. Some weed species will require tank mixes for adequate control.

The addition of surfactants can increase control. Biennials are best controlled in the rosette stage. Regrowth may occur in resistant species.

**HERBACEOUS BROADLEAF WEED CONTROL** Apply 2 to 5 ½ pints of BRASH® in 20 to 100 gallons of water per treated acre. When using low volume application equipment 3 to 20 gallons of water per acre is acceptable. 2 to 4 pints per acre of BRASH® is recommended for annuals, 3 to 5 pints per acre for biennials and 5 ½ pints per acre for established perennials.

**BRUSH AND VINE CONTROL – High Volume Foliar Spot Applications** Mix 6 to 8 pints of BRASH® in enough water to make 100 gallons of spray mix. When using low volume application equipment 3 to 20 gallons of water per acre is acceptable. Spray volume applied will depend on the size and density of the brush to be treated, but do not apply more than 8 pints of product per treated acre. Direct the spray to treat all foliage, stems, and root collars to wet.

**BRUSH AND VINE CONTROL – Broadcast Applications with Ground Equipment** Apply 6 to 8 pints of BRASH® in 20 to 100 gallons of water per treated acre. When using low volume application equipment 3 to 20 gallons of water per acre is acceptable. Spray volume applied will depend on the size and density of the brush to be treated, but do not apply more than 8 pints of product per treated acre. Spray all foliage, stems, and root collars to wet.

**AERIAL APPLICATIONS** Aerial applications may be made to control either herbaceous or woody plants. Apply 1 to 3 quarts of BRASH® for herbaceous weeds or 6 to 8 pints for woody brush and vines in 5 to 40 gallons of water per acre. Coverage is important, so increase spray volume when treating dense stands of brush or weeds. Do not apply more than 8 pints of product per treated acre.

#### TANK MIX TREATMENTS

**READ AND FOLLOW THE LABEL OF EACH TANK MIX PRODUCT USED FOR PRECAUTIONARY STATEMENTS, DIRECTIONS FOR USE, AND OTHER RESTRICTIONS.** For broader spectrum control BRASH® may be tank mixed with one or more of the following herbicides for non-cropland use (e.g. railroad, highway, pipeline, etc.):

Amitrole	Diquat	Maleic hydrazide	Simazine
Asulam	Diuron	Mefluidide	Sulfometruon methyl
Atratal	Fenac	Metsulfuron methyl	Sulfosate
Bromacil	Fosamine ammonium	MSMA	Tebuthiuron
Clorflurecol	Glyphosate	Norflurazon	Triclopyr
Chlorsulfuon	Glufosinate	Paraquat	2,4-D
Clpyralid	Hexazinone	Pendimethalin	2,4-DP
Dalapon	Imazapyr	Picloram	
Dicamba	Imazameth	Prodiamine	

Due to variations in formulated products and water supplies, a compatibility test is recommended prior to actual tank mixing.

All intended tank mix combinations should be used only in recommended areas on the same broadleaf weed species found on both labels. For application methods and other use specifications, use the most restricted limitations from labeling of both products.

#### RIGHTS OF WAY RESTRICTIONS

- Postemergence (annual & perennial weeds) Do not make more than 2 applications per year.

- Postemergence (annual & perennial weeds) Do not apply more than 5 ½ pints per acre per application
- Postemergence (annual & perennial weeds) Minimum spray interval between applications is 30 days
- Postemergence (woody plants) Do not make more than 1 application per year
- Postemergence (woody plants) Do not apply more than 8 pints per acre per application

Applications to non cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use or for commercial seed production or for research purposes

BRASH® contains 0.36 pounds a.e. of 2,4-D per pint. When tank mixing with products that contain 2,4-D do not exceed a combined total of 4.0 pounds of a.e. per acre per year.

BRASH® contains 0.125 pounds a.e. of dicamba per pint. When tank mixing with products that contain dicamba do not exceed a combined total of 1.0 pound of a.e. per acre per application.

#### WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW (1) THE GOODS DELIVERED TO YOU ARE FURNISHED AS IS BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY, OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO, MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING, BUT NOT LIMITED TO, INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

#### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS, OR DEMANDS, WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF, THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS, OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of the directions for use, the warranty disclaimers, or limitations on liability, do not use the product and return it unopened to the Seller, and the purchase price will be refunded.

#### REGISTERED TRADEMARKS

BROX™, Fallow Star™, and Gly Star™ are trademarks of Albaugh, Inc.  
Basagran® and Laddok® are registered trademarks of BASF Ag Products.