



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number:
62719-524

Date of Issuance:
NOV 22 2005

NOTICE OF PESTICIDE:

Registration
 Reregistration

(under FIFRA, as amended)

Term of Issuance:
Conditional

Name of Pesticide Product:
ForeFront™ R&P

Name and Address of Registrant (include ZIP Code):

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

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

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

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

This product is registered in accordance with FIFRA sec. 3(c) (7) (A) provided that you:

- 1. Add the phrase "EPA Registration No. 62719-524 to the label before you release the product for shipment.

COMMENTS CONTINUED ON PAGE 2 OF THIS NOTICE OF REGISTRATION

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product under the enclosed stamped copy of the label constitutes acceptance of these conditions.

Enclosure

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Signature of Approving Official:

Joanne I. Miller

Date:

NOV 22 2005

Comments Continued:

- 2. Submit completed enforcement method of analysis to show that the analytical method differentiates between aminopyralid, picloram and clopyralid.
- 3. Submit the completed enforcement method to EPA Fort Meade Laboratory for validation.
- 4. Submit storage stability data for grass forage and hay reflecting up to approximately 15 months of frozen storage.
- 5. Submit a repeated Aerobic Soil Metabolism Study (EPA Guidelines No. 162-1).
- 6. Submit a repeated Avian Reproduction study in bobwhite quail (EPA guideline No. 71-4(a)).
- 7. Submit a repeated Tier II Aquatic Plant Growth: Blue-Green Algae, Anabaena flos aquae (EPA Guideline No. 123-2).
- 8. Submit the following data required for the registration of this pesticide product within 1 year from the date of this "Notice of Registration":

<u>EPA Guideline Data Number</u>	<u>Guideline Descriptor</u>
830.6317	Storage Stability Study
830.6320	Corrosion Characteristics Study
- 9. Delete the Editor's Notes from the label.
- 10. Submit one (1) copy of the final printed labeling before you release this product for shipment.
- 11. Submit and/or cite all data required for the registration of this product when the Agency requires all registrants of similar products to submit data; and submit acceptable responses required for reregistration of this product under FIFRA, section 4.

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(Base label):

(Logo) Dow AgroSciences

ForeFront™ R&P

Specialty Herbicide

For control of annual, biennial, and perennial broadleaf weeds, including invasive and noxious weeds, on rangeland, permanent grass pastures, Conservation Reserve Program (CRP) acres, non-cropland areas such as rights-of-way, roadsides, non-irrigation ditch banks, and natural areas such as wildlife management areas, natural recreation areas, campgrounds, trailheads and trails, and grazed areas in and around non-crop sites

Group	4	HERBICIDE
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Active Ingredient:

Triisopropanolammonium salt of 2-pyridine carboxylic acid, 4-amino-3,6-dichloro-	6.58%
Triisopropanolammonium salt of (2,4-dichlorophenoxy) acetic acid	51.06%
Other Ingredients	<u>42.36%</u>
Total	100.00%

Acid Equivalents:

aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) – 3.4% - 0.33 lb/gal (40 g/L)	<u>62719-524</u>
2,4-D [(2,4-dichlorophenoxy) acetic acid] – 27.2% - 2.67 lb/gal (320 g/L)	

ACCEPTED
with COMMENTS
In EPA Letter Dated:
NOV 22 2005
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

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.)

Precautionary Statements

Hazards to Humans and Domestic Animals

Corrosive • Causes Irreversible Eye Damage • Harmful if Swallowed

Do not get in eyes or on clothing.

Personal Protective Equipment (PPE)

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

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Protective eyewear
- Chemical-resistant gloves made of any waterproof material such as natural rubber
- Shoes plus socks

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

User Safety Recommendations

Users should:

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

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

Environmental Hazards

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Care 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.

Agricultural Use Requirements

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

Refer to label booklet for Directions for Use including Storage and Disposal.

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

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

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

EPA Reg. No. 62719-LEU

EPA Est. _____

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Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

Net Contents __

(Datapack cover):

(Logo) Dow AgroSciences

ForeFront™ R&P

Specialty Herbicide

For control of annual, biennial, and perennial broadleaf weeds, including invasive and noxious weeds, on rangeland, permanent grass pastures, Conservation Reserve Program (CRP) acres, non-cropland areas (such as rights-of-way, roadsides and non-irrigation ditch banks), and natural areas (such as wildlife management areas, natural recreation areas, campgrounds, trailheads and trails), and grazed areas in and around these sites.

Group	4	HERBICIDE
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Active Ingredient:

Triisopropanolammonium salt of 2-pyridine carboxylic acid, 4-amino-3,6-dichloro-	6.58%
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Other Ingredients	42.36%
Total	100.00%

Acid Equivalents:

aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) – 3.4%	- 0.33 lb/gal (40 g/L)
2,4-D [(2,4-dichlorophenoxy) acetic acid] – 27.2%	- 2.67 lb/gal (320 g/L)

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.)

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

Refer to inside of label booklet for additional precautionary information, including Personal Protective Equipment (PPE), User Safety Recommendations and Directions for Use including Storage and Disposal.

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

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

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EPA Est. _____

Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

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Precautionary Statements

Hazard to Humans and Domestic Animals**DANGER****Corrosive • Causes Irreversible Eye Damage • Harmful if Swallowed**

Do not get in eyes or on clothing.

Personal Protective Equipment (PPE)

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

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Protective eyewear
- Chemical-resistant gloves made of any waterproof material such as natural rubber
- Shoes plus socks

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

User Safety Recommendations

Users should:

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

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

Environmental Hazards

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Care 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

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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. Read all Directions for Use carefully before applying.

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

Agricultural Use Requirements

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

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

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as natural rubber.
- Protective eyewear
- Shoes plus socks

Non-Agricultural Use Requirements

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

Entry Restrictions for Non-WPS Uses: For applications on rangeland, permanent grass pastures, and non-cropland areas, do not enter or allow worker entry into treated areas until sprays have dried.

Storage and Disposal

Do not contaminate water, food, feed or fertilizer by storage or disposal. Open dumping is prohibited. **Pesticide Storage:** If this product is exposed to subfreezing temperatures, the active ingredient may crystallize and settle out of solution. Under these conditions the product should be warmed to at least 40°F and agitated well to dissolve any crystallized material prior to use.

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

Container Disposal (Metal): Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Container Disposal (Plastic): Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

General Information

ForeFront™ R&P specialty herbicide controls annual, biennial, and perennial broadleaf weeds, including invasive and noxious weeds, on rangeland, permanent grass pastures, Conservation Reserve Program (CRP) acres, non-cropland areas such as rights-of-way, roadsides, non-irrigation ditch banks, and natural areas such as wildlife management areas, natural recreation areas, campgrounds, trailheads and trails, and grazed areas in and around non-crop sites.

Resistance Management Guidelines

- Development of plant populations resistant to this herbicide mode of action is usually not a problem on rangeland, permanent grass pastures, CRP, or non-cropland sites since these sites receive infrequent pesticide applications.
- In croplands, use an effective integrated pest management (IPM) program, integrating tillage or other mechanical methods, crop rotation or other cultural control methods into weed control programs whenever practical.
- Similar looking biotypes of a given weed species occurring in a treated area may vary in their susceptibility to a herbicide. Application of a herbicide below its recommended rate may allow more tolerant weeds to survive and a shift to more tolerant biotypes within the treated area.
- Where identified, spreading of resistant weeds to other fields may be prevented by cleaning harvesting and tillage equipment before moving to other areas and by planting weed-free seed.
- Contact your extension specialist, certified crop consultant, or Dow AgroSciences representative for the latest resistance management information.

Use Precautions and Restrictions

- **Avoiding Injury to Non-Target Plants:** Do not aerially apply ForeFront R&P within 50 feet of a border downwind (in the direction of wind movement), or allow spray drift to come in contact with, any broadleaf crop or other desirable broadleaf plants, including, but not limited to, alfalfa, cotton, dry beans, flowers, grapes, lettuce, potatoes, radishes, soybeans, sugar beets, sunflowers, tobacco, tomatoes or other broadleaf or vegetable crop, fruit trees, ornamental plants, or soil where sensitive crops are growing or will be planted. Avoid application under conditions that may allow spray drift since very small quantities of spray may seriously injure crops. Follow Precautions for Avoiding Spray Drift and Spray Drift Advisory under General Mixing and Application Instructions to minimize the potential for spray drift.
- **ForeFront R&P is highly active against many broadleaf plants.** Do not use this product on areas where loss of desirable broadleaf forage plants, including legumes, cannot be tolerated.
- **Chemigation:** Do not apply this product through any type of irrigation system.
- **Do not contaminate water intended for irrigation or domestic purposes.** Do not treat inside banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes.
- **Crop Rotation:** Do not rotate non-cropland to cropland for one year following an application of ForeFront R&P. Do not plant a broadleaf crop until an adequately sensitive field bioassay shows that the level of aminopyralid present in the soil will not adversely affect that broadleaf crop.
- **Seeding Legumes:** Do not plant forage legumes until a soil bioassay has been conducted to determine if aminopyralid residues remaining in the soil will adversely affect the legume establishment.
- **Field Bioassay Instructions:** In a representative section of an area previously treated with this product, plant short test rows of the intended species across the original direction of application in a manner to sample variability in field conditions such as soil texture, soil organic matter, soil pH, or drainage. The field bioassay can be initiated at any time between harvest of the treated crop and the planting of the intended species. Observe the test crop for symptoms of herbicidal activity, such as poor stand (effect on seed germination), chlorosis (yellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If herbicidal activity is observed, do not plant the field to the intended species; plant only to a labeled crop.
- **Aminopyralid in Plant Residues or Manure:**
 - ◆ Do not use aminopyralid-treated plant residues, including hay or straw from treated areas, or manure from animals that have grazed forage or eaten hay harvested from treated areas within the

previous 3 days, in compost or mulch that will be spread to areas where broadleaf plants may be grown.

- ◆ Do not spread manure from animals that have grazed or consumed forage or hay from treated areas within the previous 3 days on land used for growing broadleaf crops.
- ◆ Manure from animals that have grazed forage or hay harvested from aminopyralid-treated areas within the previous 3 days may only be used on pasture grasses, grass grown for seed, and wheat.
- ◆ Do not plant a broadleaf crop in fields treated in the previous year with manure from animals that have grazed forage or hay harvested from aminopyralid-treated areas until an adequately sensitive field bioassay is conducted to determine that the aminopyralid residues in the soil is at level that is not injurious to the crop to be planted.
- ◆ To promote herbicide decomposition, plant residues should be evenly incorporated in the surface soil or burned. Breakdown of aminopyralid in plant residues or manure is more rapid under warm, moist soil conditions and may be accelerated by supplemental irrigation.
- **Grazing and Haying Restrictions:** Do not harvest forage for hay within 7 days of ForeFront R&P application. Do not reapply ForeFront R&P within 30 days of a previous application. Do not transfer grazing animals (including horses) from areas treated with ForeFront R&P to areas where sensitive broadleaf crop occur without first allowing 3 days of grazing on an untreated pasture. Otherwise, urine and manure may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- **Maximum Application Rate:** Do not apply more than 42 fl oz (2.6 pints) per acre of ForeFront R&P per growing season. The total amount of ForeFront R&P applied broadcast, as a re-treatment, and/or spot treatment per year must not exceed 42 fl oz (2.6 pints) per acre. If products containing the same active ingredient are mixed, do not exceed the maximum allowable active ingredient use rate.

Precautions for Avoiding Spray Drift

Avoid application under conditions that may allow spray drift because very small quantities of spray, which may not be visible, may seriously injure crops. This product should be applied only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops and other plants) is minimal (e.g., when wind is blowing away from the sensitive areas. A drift control aid may be added to the spray solution to further reduce the potential for drift. If a drift control aid is used, follow the use directions and precautions on the manufacturer's label. Do not use a thickening agent with Microfoil, Thru-Valve booms, or other spray delivery systems that cannot accommodate thickened spray solutions.

Ground Equipment: With ground equipment, spray drift can be lessened by keeping the spray boom as low as possible; by applying 10 gallons or more of spray per acre; by keeping the operating spray pressures at the manufacturer's recommended minimum pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when the wind velocity is low (follow state regulations). Avoid calm conditions which may be conducive to thermal inversions. Direct sprays no higher than the tops of target vegetation and keep spray pressures low enough to provide coarse spray droplets to minimize drift.

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

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

1. The distance of the outer most operating nozzles on the boom must not exceed 75% of wingspan or 90% of rotor diameter.
2. Nozzles should be pointed backward parallel with the air stream or not pointed downwards more than 45 degrees.

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

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The applicator should be familiar with and take into account the information covered in the following **Aerial Drift Reduction Advisory**. This information is advisory in nature and does not supersede mandatory label requirements.

Aerial Drift Reduction Advisory

Information on Droplet Size: The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size:

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- **Number of Nozzles** - Use the minimum number of nozzles that will provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produced larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length: For some use patterns, reducing the effective boom length to less than 90% of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment: When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

Wind: Drift potential is lowest between wind speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. **Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

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

Temperature Inversions: Applications should not occur during a local, low level temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement

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

Mixing Instructions

Mixing with Water

To prepare the spray, add about half the required amount of water in the spray tank. Then, with agitation, add the recommended amount of ForeFront R&P and other registered tank mix herbicides. Finally, with continued agitation, add the rest of the water and additives such as surfactants or drift control and deposition aids.

Tank Mixing with Other Herbicides

ForeFront R&P at rates of up to 42 fl oz (2.6 pints) per acre may be mixed with labeled rates of other labeled herbicides to broaden the spectrum of weeds controlled or to improve control of certain weeds. ForeFront R&P may be applied in tank mix combination with labeled rates of other herbicides provided: (1) the tank mix product is labeled for the timing and method of application for the use site to be treated and (2) mixing is not prohibited by the label of the registered tank mixed products. Use as directed in the Directions for Use section of the tank mix partner.

Tank Mixing Precautions:

- For products packaged in water soluble packaging, do not tank mix with products containing boron or mix in equipment previously used to apply a product mixture containing boron unless the tank and spray equipment has been adequately cleaned. (See Sprayer Clean-Out instructions.)
- Always perform a (jar) test to ensure the compatibility of products to be used in tank mixture.

Tank Mix Compatibility Testing: A jar test is recommended prior to mixing in a spray tank to ensure compatibility of ForeFront R&P and other pesticides or carriers. Use a clear glass jar with lid and mix ingredients in the same order and proportions as will be used in the spray tank. The mixture is compatible if the materials mix readily when the jar is inverted several times. The mixture should remain stable after standing for 1/2 hour or, if separation occurs, should readily mix if agitated. An incompatible mixture is indicated by separation into distinct layers that do not readily remix when agitated and/or the presence of flakes, precipitates, gels, or heavy oily film in the jar. Use of an appropriate compatibility agent may resolve mix incompatibility.

Use with Surfactants: The addition of a high quality non-ionic surfactant at 0.25 to 0.5 % volume per volume (1 to 2 quarts per 100 gallons of spray) is recommended to enhance herbicide activity under adverse environmental conditions (such as, high temperature, low relative humidity, drought conditions, dusty situations) or when weeds are heavily pubescent or more mature.

Mixing with Sprayable Liquid Fertilizer Solutions

ForeFront R&P is usually compatible with liquid fertilizer solutions. It is anticipated that ForeFront R&P will not require a compatibility agent for mixing with fertilizers; however, a compatibility test (jar test) should be made prior to mixing. Jar tests are particularly important when a new batch of fertilizer or pesticide is used, when water sources change, or when tank mixture ingredients or concentrations are changed. Compatibility may be determined by mixing the spray components in the desired order and proportions in a clear glass jar before large scale mixing of spray components in the spray tank. Use of a compatibility agent is recommended to help obtain and maintain a uniform spray solution during mixing and application. Note: The lower the temperature of the liquid fertilizer, the greater the likelihood of mixing problems. Mixing ForeFront R&P in N-P or N-P-K liquid fertilizer solutions is more difficult than mixing with straight nitrogen fertilizer and should not be attempted without first conducting a successful compatibility jar test. Agitation in the spray tank must be vigorous to be comparable with jar test agitation. Apply the spray mixture the same day it is prepared while maintaining continuous agitation. Rinse the spray tank thoroughly after use.

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Note: Foliar-applied liquid fertilizers used as carrier for ForeFront R&P can cause yellowing of the foliage of forage grasses and other vegetation.

Sprayer Clean-Out Instructions

Do not use spray equipment used to apply ForeFront R&P for other applications to land planted to, or to be planted to, crops or desirable sensitive plants, unless it has been determined that all residues of this herbicide has been removed by thorough cleaning of equipment.

Equipment used to apply ForeFront R&P should be thoroughly cleaned before reusing to apply any other chemicals as follows.

1. Rinse and flush application equipment thoroughly after use. Dispose of rinse water in non-cropland area away from water supplies.
2. Rinse a second time, adding 1 quart of household ammonia or tank cleaning agent for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15 to 20 minutes). Let the solution stand for several hours, preferably overnight.
3. Flush the solution out of the spray tank through the boom.
4. Rinse the system twice with clean water, recirculating and draining each time.
5. Spray nozzles and screens should be removed and cleaned separately.

Application Methods

(Broadcast Equipment)

Ground Broadcast Application: Apply the recommended rate of ForeFront R&P as a coarse low-pressure spray. Spray volume should be sufficient to uniformly cover foliage. Increase spray volume to ensure thorough and uniform coverage when target vegetation is tall and/or dense. Higher volumes (greater than 10 gallons per acre) generally provide better coverage and better control, particularly in dense and/or tall foliage canopies situations. To enhance foliage wetting and coverage, an approved non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant manufacturer.

Do not apply this product with mist blower systems that deliver very fine spray droplets. Use of mist blower equipment can reduce weed control and increase spray drift potential.

Aerial Broadcast Application: Apply the recommended rate of ForeFront R&P as a coarse low-pressure spray. Spray volume should be sufficient to uniformly cover foliage. Increase spray volume to ensure thorough and uniform coverage when target vegetation is tall and/or dense. Spray volumes greater than 2 gallons per acre generally provide better coverage and better control, particularly when the foliage canopy is dense and/or tall. To enhance foliage wetting and coverage, an approved non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant manufacturer.

(Hand-Held Equipment)

High-Volume Foliar Application: High volume foliar treatments may be applied at rates equivalent to broadcast up to a maximum of 42 fl oz (2.6 pints) per acre per annual growing season. Use sufficient spray volume to thoroughly and uniformly wet foliage and stems. To ensure thorough foliage wetting of high volume treatments, a high quality non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant manufacturer. Repeat treatments may be made, but the total amount of ForeFront R&P applied must not exceed 42 fl oz (2.6 pints) per acre per year.

Spot Application: Spot treatments may be applied at rates equivalent to broadcast-applied rate of up to a maximum of 84 fl oz (5.2 pints) on 50% of the treated field. Spray volume should be sufficient to thoroughly and uniformly wet weed foliage. Use of a high quality non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant manufacturer. Repeat treatments may be made, but the total amount of ForeFront R&P applied must not exceed 42 fl oz (2.6 pints) per acre per year. To prevent misapplication, spot treatments should be applied with a calibrated boom, boomless spray system, hand-held, or backpack sprayers.

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Spot treatments may be applied at an equivalent broadcast rate of up to 82 fl oz of ForeFront R&P per acre per annual growing season; however, not more than 50% of an acre may be treated. Do not apply more than a total of 42 fl oz (2.6 pints) per acre of ForeFront R&P per annual growing season as the result of broadcast, spot or repeat applications.

Application rates in the table below are based on treating an area of 1000 sq ft. An area of 1000 sq ft is about 10.5 by 10.5 yards in size. Mix the amount of ForeFront R&P (fl oz or milliliters) corresponding to the desired broadcast rate in 0.5 to 2.5 gallons of water, depending upon the spray volume required to treat 1000 sq ft. A delivery volume of 0.5 gallons per 1000 sq ft is equivalent to 22 gallons per acre and 2.5 gallons per 1000 sq ft is equivalent to 109 gallons per acre.

Amount of ForeFront R&P per 1000 sq ft to Equal Broadcast Rate			
Broadcast Rate		Amount of ForeFront R&P per 1000 sq ft	
(fl oz/acre)	(pt/acre)	(fl oz)	(Milliliters)
24	1.5	0.55	16.3
32	2	0.74	21.7
42	2.6	0.96	28.5

Note: 1 fluid ounce (fl oz) = 29.6 milliliters (ml) = 2 tablespoons = 6 teaspoons

To calculate the amount of ForeFront R&P for areas larger than 1000 sq ft: Multiply the table value (fl oz or milliliters) by the area to be treated in "thousands" of square feet. For example, if the area to be treated is 3500 sq ft, multiply the table value by 3.5 (3500 sq ft divided by 1000 sq ft = 3.5).

Broadleaf Weed Control

Do not use ForeFront R&P if loss of legumes species or other broadleaf species cannot be tolerated.

Broadleaf Weed Management Practices

ForeFront R&P may be applied postemergence as a broadcast spray or as a spot application to control broadleaf weeds listed on this label; weeds other than those listed may also be controlled by this herbicide. Postemergence applications should be made before bud stage or early flowering unless otherwise specified. When a rate range is given, use a higher rate in the range to control weeds at advanced growth stages or under less-than-favorable growing conditions (e.g., drought stress). Best weed control results are obtained when spray volume is sufficient to provide uniform coverage of treated plants. For optimum uptake and translocation of the herbicide, avoid mowing, haying, shredding, burning or soil disturbance in treated areas for at least 7 days following application.

ForeFront R&P also provides preemergence control of germinating seeds or emerging seedlings of broadleaf weeds following application. Weed establishment following ForeFront R&P application will depend upon application rate, season of application, and growing condition.

ForeFront R&P can provide long-term control of weeds. The length of control is dependent upon the application rate, condition and growth stage of target weeds, environmental conditions at and following application, and the density and vigor of competing desirable vegetation. Long-term broadleaf weed control is most effective where forage grasses are allowed to recover from overgrazing, drought, etc., and compete with broadleaf weeds.

ForeFront R&P can be an important component of integrated vegetation management programs designed to renovate or restore desired non-cropland plant communities. To maximize and extend the benefits of weed control provided by ForeFront R&P, it is important that vegetation management practices, including grazing management, fertilization, prescribed fire, reseeding with desirable plants,

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etc., be used to increase the competitiveness of desired forages. Used as part of an integrated management program, ForeFront R&P can serve as a catalyst for rapid improvement of rangeland, permanent grass pasture, CRP, and non-cropland sites by alleviating the adverse competitive effect of weeds on the yield and quality of forages and other desirable plant species. Agricultural and natural resources specialists with federal and state government agencies can provide guidance on best management practices and development of integrated vegetation management systems.

Broadleaf Weeds Controlled

The following weeds will be controlled at 1.5 to 2.6 pint/acre. For best results, apply when weeds are actively growing and conditions favorable for plant growth. Use a higher rate in the rate range when growing conditions are less than favorable, when weeds are mature, or when weed foliage is tall and dense. ForeFront R&P also provides preemergence control of germinating seeds or emerged seedlings of broadleaf weeds following application.

Weed Species			
Common Name	Scientific Name	Life Cycle***	Plant Family
Rate Range: 1.5 to 2 pints/acre			
carrot, wild*	<i>Daucus carota</i>	biennial	Apiaceae
cinquefoil, sulfur**	<i>Potentilla recta</i>	perennial	Rosaceae
clover, sweet	<i>Melilotus officinalis</i>	biennial	Fabaceae
clover, white	<i>Trifolium repens</i>	perennial	Fabaceae
crownvetch*	<i>Coronilla varia</i>	perennial	Fabaceae
daisy, oxeye**,**	<i>Leucanthemum vulgare</i>	perennial	Asteraceae
falsedandelion, Carolina*	<i>Pyrrhopappus carolinianus</i>	annual/biennial	Asteraceae
horsenettle, Carolina**,**	<i>Solanum carolinense</i>	perennial	Solanaceae
pokeweed, common	<i>Phytolacca americana</i>	perennial	Phytolaccaceae
ragweed, common**,**	<i>Ambrosia artemisiifolia</i>	annual	Asteraceae
ragweed, western	<i>Ambrosia psilostachya</i>	perennial	Asteraceae
ragwort, tansy***	<i>Senecio jacobaea</i>	perennial	Asteraceae
starthistle, yellow***	<i>Centaurea solstitialis</i>	annual	Asteraceae
thistle, bull**	<i>Cirsium vulgare</i>	biennial	Asteraceae
thistle, musk**,**	<i>Carduus nutans</i>	biennial	Asteraceae
thistle, plumelless**,**	<i>Carduus acanthoides</i>	biennial	Asteraceae
vicia, common*	<i>Vicia sativa</i>	annual	Fabaceae
woodsorrel, yellow*	<i>Oxalis stricta</i>	perennial	Oxalidaceae
wormwood, absinth**	<i>Artemisia absinthium</i>	perennial	Asteraceae
Rate Range: 2 to 2.6 pints/acre			
actinomeris, wingstem	<i>Verbesina alternifolia</i>	perennial	Asteraceae
amaranth, spiny	<i>Amaranthus spinosus</i>	annual	Amaranthaceae
broomweed, annual*	<i>Amphichyris dracunculoides</i>	annual	Asteraceae
burdock, common**	<i>Arctium minus</i>	biennial	Asteraceae
buttercup, hairy*	<i>Ranunculus sardous</i>	perennial	Ranunculaceae
buttercup, tall*	<i>Ranunculus acris</i>	perennial	Ranunculaceae
camphorweed*	<i>Heterotheca subaxillaris</i>	annual	Asteraceae
chickweed, common*	<i>Stellaria media</i>	annual	Caryophyllaceae
chicory*	<i>Cichorium intybus</i>	perennial	Asteraceae
cocklebur*	<i>Xanthium strumarium</i>	annual	Asteraceae
croton, woolly**,**	<i>Croton capitatus</i>	annual	Euphorbiaceae
cudweed, purple	<i>Gnaphalium purpureum</i>	annual	Asteraceae
dandelion, common*	<i>Taraxacum officinale</i>	perennial	Asteraceae

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dock, broadleaf*	<i>Rumex obtusifolius</i>	perennial	Polygonaceae
dock, curly*	<i>Rumex crispus</i>	perennial	Polygonaceae
evening primrose, cutleaf*	<i>Oenothera laciniata</i>	annual	Asteraceae
false dandelion, Carolina*	<i>Tragopogon dubius</i>	biennial	Asteraceae
fiddleneck, common	<i>Amsinckia intermedia</i>	annual	Boraginaceae
fleabane, annual*	<i>Erigeron annuus</i>	annual	Asteraceae
goldenrod, Canada*	<i>Solidago canadensis</i>	perennial	Asteraceae
goldenrod, Missouri*	<i>Solidago missouriensis</i>	perennial	Asteraceae
goldenrod, rigid	<i>Solidago rigida</i>	perennial	Asteraceae
hawkweed, orange**,**	<i>Hieracium aurantiacum</i>	perennial	Asteraceae
hawkweed, yellow**,**	<i>Hieracium pratense</i>	perennial	Asteraceae
henbit*	<i>Lamium amplexicaule</i>	annual/biennial	Lamiaceae
horseweed*	<i>Conyza canadensis</i>	annual	Asteraceae
ironweed, tall	<i>Vernonia gigantea</i>	perennial	Asteraceae
ironweed, western	<i>Vernonia baldwinii</i>	perennial	Asteraceae
knapweed, diffuse**,**	<i>Centaurea diffusa</i>	biennial	Asteraceae
knapweed, Russian**,**	<i>Acroptilon repens</i>	perennial	Asteraceae
knapweed, spotted**,**	<i>Centaurea stoebe</i>	biennial	Asteraceae
kudzu**,**	<i>Pueraria montana</i>	perennial	Fabaceae
lambquarters, common*	<i>Chenopodium album</i>	annual	Chenopodiaceae
lettuce, prickly*	<i>Lactuca serriola</i>	annual	Asteraceae
marshelder, annual*	<i>Iva annua</i>	annual	Asteraceae
mayweed, scentless*	<i>Tripleurospermum perforata</i>	annual	Asteraceae
mayweed, stinking**,**	<i>Anthemis cotula</i>	annual	Asteraceae
medic, black*	<i>Medicago lupulina</i>	perennial	Fabaceae
mexicantea	<i>Dysphania ambrosioides</i>	annual/perennial	Chenopodiaceae
partridgepea*	<i>Chamaecrista fasciculata</i>	annual	Fabaceae
plantain, broadleaf*	<i>Plantago major</i>	perennial	Plantaginaceae
plantain, buckhorn*	<i>Plantago lanceolata</i>	perennial	Plantaginaceae
sicklepod*	<i>Senna obtusifolia</i>	annual	Fabaceae
sneezeweed, bitter*	<i>Helenium amarum</i>	annual	Asteraceae
soda apple, tropical**,**	<i>Solanum viarum</i>	perennial	Solanaceae
sowthistle, perennial**,**	<i>Sonchus arvensis</i>	perennial	Asteraceae
sowthistle, prickly*	<i>Sonchus asper</i>	annual	Asteraceae
starthistle, yellow**,**	<i>Centaurea solstitialis</i>	annual	Asteraceae
sunflower, common*	<i>Helianthus annuus</i>	annual	Asteraceae
teasel, fuller's*	<i>Dipsacus sativus</i>	biennial	Dipsacaceae
thistle, Canada**,**	<i>Cirsium arvense</i>	perennial	Asteraceae
vervain, blue*	<i>Verbena hastata</i>	perennial	Asteraceae
vervain, hoary*	<i>Verbena stricta</i>	perennial	Asteraceae
yarrow, common*	<i>Achillea millefolium</i>	perennial	Asteraceae

*Invasive plants are introduced species that are indicated to be invasive in the USDA-NRCS, PLANTS Database (<http://plants.usda.gov/index.html>).

**Plants designated as noxious weeds in at least one state (PLANTS Database, USDA-NRCS, <http://plants.usda.gov/index.html>).

***Spot treatment at rates up to 84 fl oz (5.2 pints) of ForeFront R&P may be particularly effective against dense patches of perennial broadleaf plants.

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Site Specific Use Directions

Rangeland, Permanent Grass Pastures and CRP Acres

ForeFront R&P may be applied alone or in tank mix combination to rangeland, permanent pasture or CRP acres seeded to permanent grasses as an aerial or ground broadcast treatment, as a spot application, or as a high volume foliar application. (See Application Methods section.) Refer to the Broadleaf Weeds Controlled section for application rates and timing recommendations for specific broadleaf weeds.

Do not use ForeFront R&P if loss of legumes species or other broadleaf species cannot be tolerated.

During the season of establishment, ForeFront R&P should be applied only after perennial grasses are well established (have developed a good secondary root system and show good vigor). Most perennial grasses are tolerant to ForeFront R&P at this stage of development.

ForeFront R&P may suppress certain established grasses, such as smooth brome grass (*Bromus inermis*) and buffalograss (*Buchloe dactyloides*), especially when plants are stressed by adverse environmental conditions. Plants should recover from this transient suppression with the onset of environmental conditions favorable to grass growth and upon release from weed competition.

Restriction: Do not apply more than a total of 42 fl oz (2.6 pints) per acre of ForeFront R&P per annual growing season as a result of broadcast, spot or repeat applications.

Non-Cropland Areas

ForeFront R&P may be applied alone or in tank mix combination to non-cropland areas, such as non-irrigation ditch banks, industrial and storage areas, airports, roadsides, railroad and utility rights-of-way, including grazed areas on these sites as an aerial or ground broadcast treatment, as a spot application, or as a high volume foliar application (see Application Methods section). Refer to the Broadleaf Weeds Controlled section for application rates recommended for specific broadleaf weeds.

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