



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. John J. Jachetta, Ph.D.
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46248

SEP 30 2011

Subject: Notification of Minor Label Change Per PR Notice 98-10
ForeFront® R&P
EPA Reg. No. 62719-524
Your Application, Dated September 22, 2011

Dear Dr. Jachetta:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested (minor revision of the directions for seeding grasses) falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at (703) 305-1243 or Susan Stanton of my staff at (703) 305-5218.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-524	2. EPA Product Manager Katherine Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/ForeFront® R&P	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <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. <u>NOTIFICATION</u> Product Name <u>SEP 30 2011</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
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 sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted					
If "Yes" Unit Packaging wgt.		No. per container	If "Yes" Package wgt.		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name John J. Jachetta, Ph.D.	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4683
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 Regulatory Manager	
4. Typed Name John J. Jachetta, Ph.D. ®Trademark of Dow AgroSciences LLC	5. Date September 22, 2011	

308/2E
September 22, 2011



Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

FOREFRONT R&P (A.I.: AMINOPYRALID, 2,4-D)
EPA REGISTRATION NUMBER: 62719-524
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of ForeFront® R&P specialty herbicide based on EPA accepted label dated August 4, 2011. The following changes have been made by notification:

1. Seeding grasses, Preemergence: revise section for clarity to state that grasses can be reseeded in the fall following an application in the spring or early summer. This revision is acceptable via EPA notification per Agency email (Susan Stanton) dated August 29, 2011.

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 sections 12 and 14 of FIFRA.

Contents of Submission

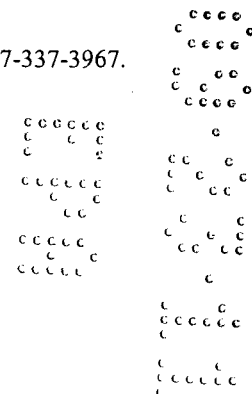
- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled ForeFront R&P (S5E / ForeFront R&P / MSTR Notif / 09-22-11)
(26 Pages plus Registration Notes) (1 Copy)
- Complimentary copy of Agency e-mail from S. Stanton dated August 29, 2011

If you require further information, please contact Amy Hudson, Regulatory Specialist at 317-337-3967.

Sincerely,

John J. Jachetta, Ph. D.
Regulatory Leader
Regulatory Success – Americas
317-337-4686
317-337-4649 (FAX)

JJJ/akh
Enclosures



ForeFront® R&P

EPA Reg. No. 62719-524

Registration Notes:

Source section 3 labeling based on EPA accepted label dated August 4, 2011. Following are changes by notification:

1. Seeding grasses, Preemergence: revise section for clarity to state that grasses can be reseeded in the fall following an application in the spring or early summer. This revision is acceptable via EPA notification per Agency email (Susan Stanton) dated August 29, 2011.

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A collection of 15 small, stylized line drawings of various birds, including shorebirds, waterfowl, and songbirds, arranged in a grid-like fashion.

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(Base label):

NOTIFICATION

SEP 30 2011

ForeFront® R&P

Specialty Herbicide

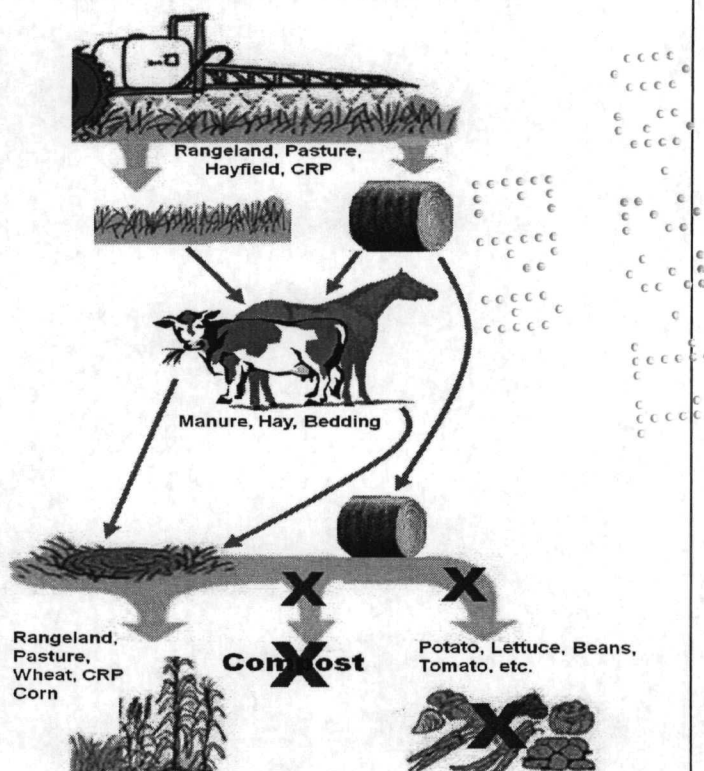
For control of susceptible weeds and certain woody plants, including invasive and noxious weeds, on rangeland, permanent grass pastures (including grasses grown for hay*), Conservation Reserve Program (CRP) acres, non-cropland areas including industrial sites, rights-of-way, (such as roadsides, electric utility and communication transmission lines, pipelines, and railroads) and non-irrigation ditch banks, natural areas (such as wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads and trails), and grazed areas in and around these sites

*Hay from grass treated with ForeFront R&P within the preceding 18-months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling

IMPORTANT USE PRECAUTIONS AND RESTRICTIONS TO PREVENT INJURY TO DESIRABLE PLANTS

- Carefully read the section "**Restrictions in Hay or Manure Use**."
- It is mandatory to follow the "**Use Precautions and Restrictions**" section of this label.
- Manure and urine from animals consuming grass or hay treated with this product may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- Hay can only be used on the farm or ranch where product is applied unless allowed by supplemental labeling.
- Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions". **Call [1-(800) 263-1196] Customer Information Group.**

Forage and Manure Management



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Not For Sale, Distribution, or Use in New York State.

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)
2,4-D [(2,4-dichlorophenoxy) acetic acid] – 27.37% - 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.)

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.

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

- Long-sleeved shirt and long pants
- Shoes plus socks
- Protective eyewear
- Chemical-resistant gloves, when applying with any handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.
- Chemical resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate

See engineering controls for additional requirements

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 exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protections 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 an enclosed cockpit that meets the requirements listed in the Worker Protections 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.

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.

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

Environmental Hazards

This product is toxic to aquatic invertebrates and may be toxic to fish. 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 except as permitted on this label. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

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.

Non-refillable containers 5 gallons or less:

Storage and Disposal

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

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: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. 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 Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers larger than 5 gallons:

Storage and Disposal

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

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: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. 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 Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers 5 gallons or larger:

Storage and Disposal

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

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: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. 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 Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container

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upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use.

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

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

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

EPA Reg. No. 62719-524

EPA Est. _____

®Trademark of Dow AgroSciences LLC

**Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268**

Net Contents ____

(cover/shipping container):

ForeFront® R&P

Specialty Herbicide

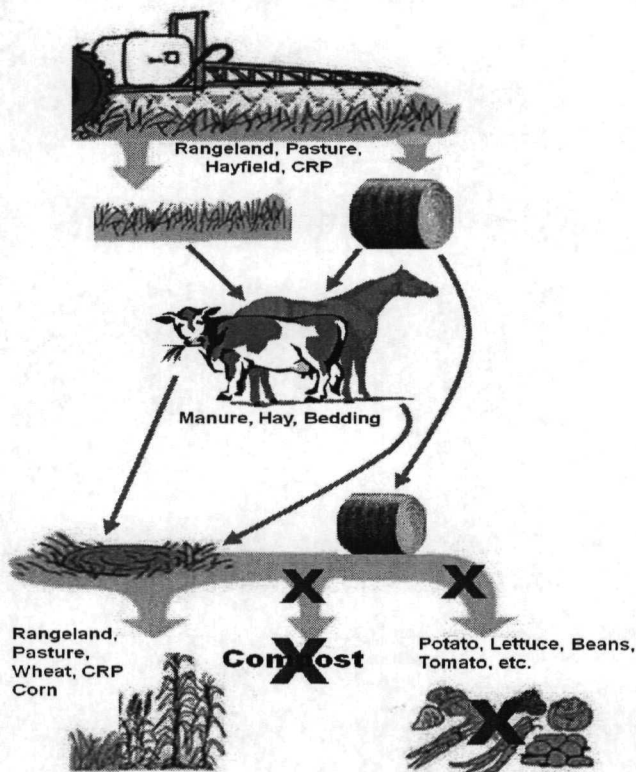
For control of susceptible weeds and certain woody plants, including invasive and noxious weeds, on rangeland, permanent grass pastures (including grasses grown for hay*), Conservation Reserve Program (CRP) acres, non-cropland areas including industrial sites, rights-of-way, (such as roadsides, electric utility and communication transmission lines, pipelines, and railroads) and non-irrigation ditch banks, natural areas (such as wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads and trails), and grazed areas in and around these sites

*Hay from grass treated with ForeFront R&P within the preceding 18-months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling

IMPORTANT USE PRECAUTIONS AND RESTRICTIONS TO PREVENT INJURY TO DESIRABLE PLANTS

- Carefully read the section "**Restrictions in Hay or Manure Use**."
- It is mandatory to follow the "**Use Precautions and Restrictions**" section of this label.
- Manure and urine from animals consuming grass or hay treated with this product may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- Hay can only be used on the farm or ranch where product is applied unless allowed by supplemental labeling.
- Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions". Call [1-(800) 263-1196] Customer Information Group.

Forage and Manure Management



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Not For Sale, Distribution, or Use in New York State.

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 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 Directions for Use.

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

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

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

EPA Reg. No. 62719-524

EPA Est. _____

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Produced for

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268

Net Contents ____

(Page 1 through end):

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.

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

- Long-sleeved shirt and long pants
- Shoes plus socks
- Protective eyewear
- Chemical-resistant gloves, when applying with any handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.
- Chemical resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate

See engineering controls for additional requirements

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 exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protections 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 an enclosed cockpit that meets the requirements listed in the Worker Protections 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.

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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.

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

Environmental Hazards

This product is toxic to aquatic invertebrates and may be toxic to fish. 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 except as permitted on this label. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

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.

Not For Sale, Distribution, or Use in New York State.

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

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Non-Agricultural Use Requirements

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

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

Storage and Disposal

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

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: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. 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.

Non-refillable containers 5 gallons or less:

Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers larger than 5 gallons:

Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers 5 gallons or larger:

Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with

water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Product Information

ForeFront® R&P specialty herbicide controls broadleaf weeds and certain woody plants, including invasive and noxious weeds, on rangeland, permanent grass pastures (including grasses grown for hay*), Conservation Reserve Program (CRP) acres, non-cropland areas including industrial sites, rights-of-way, (such as roadsides, electric utility and communication transmission lines, pipelines, and railroads) and non-irrigation ditch banks, natural areas (such as wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads and trails), and grazed areas in and around these sites.

***Hay from grass treated with ForeFront R&P within the preceding 18-months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling**

It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands (such as flood plains, deltas, marshes, swamps, or bogs) and transitional areas between upland and lowland sites. ForeFront R&P can be used to the waters edge. Do not apply directly to water and take precautions to minimize spray drift onto water.

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. EPA, C0131C, (W.D. W.A.). For further information, please refer to EPA Web site: <http://www.epa.gov/espp>.

Resistance Management Guidelines

- Development of plant populations resistant to this herbicide mode of action is usually not a problem on rangeland, permanent grass pastures, or CRP, 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

This product is not intended for reformulation or repackaging into other end-use products.

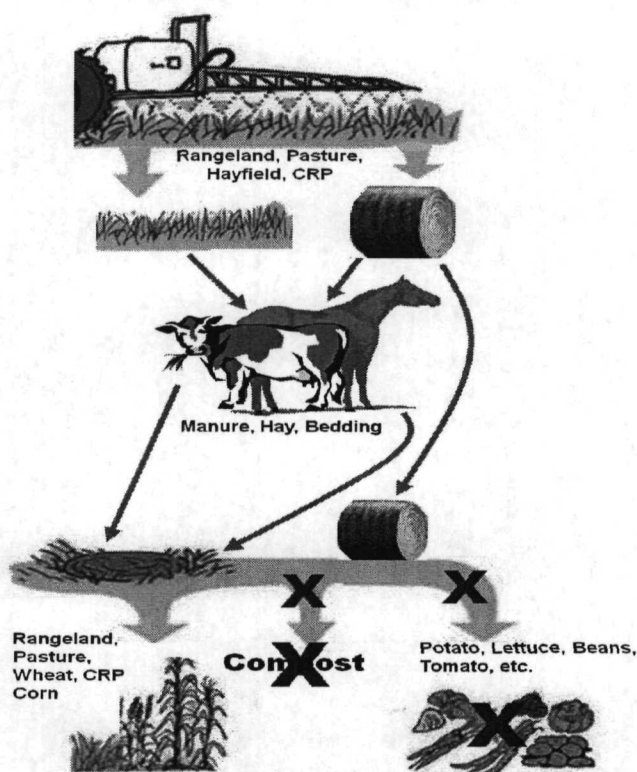
Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions." Call (1-800-263-1196) for more information.

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**IMPORTANT USE PRECAUTIONS
AND
RESTRICTIONS TO PREVENT
INJURY TO
DESIRABLE PLANTS**

- Carefully read the section **"Restrictions in Hay or Manure Use."**
- It is mandatory to follow the **"Use Precautions and Restrictions"** section of this label.
- Manure and urine from animals consuming grass or hay treated with this product may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- Hay can only be used on the farm or ranch where product is applied unless allowed by supplemental labeling.
- Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions". Call [1-(800) 263-1196] Customer Information Group.

Forage and Manure Management



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Pasture and Rangeland Restrictions

- Do not use grasses treated with ForeFront R&P in the preceding 18-months for hay intended for export outside the United States.
- Hay from areas treated with ForeFront R&P in the preceding 18-months **CANNOT** be distributed or made available for sale off the farm or ranch where harvested unless allowed by supplemental labeling.
- Hay from areas treated with ForeFront R&P in the preceding 18-months **CANNOT** be used for silage, haylage, bayslage and green chop unless allowed by supplemental labeling.
- Do not move hay made from grass treated with ForeFront R&P within the preceding 18-months off farm unless allowed by supplemental labeling.
- Do not use hay or straw from areas treated with ForeFront R&P within the preceding 18-months or manure from animals feeding on hay treated with ForeFront R&P in compost.

- **Do not use grasses treated with ForeFront R&P in the preceding 18-months for seed production.**
- **Preharvest Interval:** Do not cut forage for hay within 7 days of application. For program lands, such as CRP, 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.
- **Maximum seasonal rate:** Apply no more than 84 fl oz (1.75 lbs acid equivalent 2,4-D) per acre per use season
- Use 2 or more gallons of spray solution per acre
- Do not make more than two applications per year
- Do not apply within 30 days of previous application
- If grass is to be cut for hay, Agricultural Use Requirements for the Worker Protection Standard are applicable
- **Maximum Application Rate:** Do not broadcast apply more than 42 fl oz (2.6 pints) (0.87 lbs acid equivalent) per acre of ForeFront R&P per year. 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) (0.87 lbs acid equivalent) per acre. Spot treatments may be applied at an equivalent broadcast rate of up to 84 fl oz of ForeFront R&P (1.75 lbs acid equivalent) per acre per annual growing season; however, not more than 50% of an acre may be treated at that rate.

Restrictions for Non-Irrigation Canal Ditchbank Application

Postemergence:

Limited to 1 application per season.

Maximum of 42 fl oz (2.6 pints) (0.87 lbs ae)/acre per application.

Minimum of 30 days between applications

Spot treatments may be applied at an equivalent broadcast rate of up to 84 fl oz of ForeFront R&P (1.75 lbs acid equivalent) per acre per annual growing season; however, not more than 50% of an acre may be treated at that rate.

Do not use on small canals with a flow rate less than 10 cubic feet per second (CFS) where water will be used for drinking purposes. CFS may be estimated by using the formula below. The approximate velocity needed for the calculation can be determined by observing the length of time that it takes a floating object to travel a defined distance. Divide the distance (ft.) by the time (sec.) to estimate velocity (ft. per sec.). Repeat 3 times and use the average to calculate CFS.

Average Width (ft.) x Average Depth (ft.) x Average Velocity (ft. per sec.) = CFS

For ditchbank weeds:

Do not allow boom spray to be directed onto water surface.

Do not spray across stream to opposite bank.

For shoreline weeds:

Allow no more than 2 foot overspray onto water.

Use Restrictions

- **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.
- Do not apply this product to lawns, turf, ornamental plantings, urban walkways, driveways, tennis courts, golf courses, athletic fields, commercial sod operations, or other high-maintenance, fine turfgrass areas, or similar areas.

- Applications made during periods of intense rainfall, to soils saturated with water, surfaces paved with materials such as asphalt or concrete, or soils through which rainfall will not readily penetrate may result in runoff and movement of this product. Injury to crops may result if treated soil and/or runoff water containing this product is washed, or moved onto land used to produce crops. Exposure to this product may injure or kill susceptible crops and other plants, such as grapes, soybeans, tobacco, sensitive ornamentals. Do not treat frozen soil where runoff could damage sensitive plants.
- **Crop Rotation:** Do not rotate non-cropland to cropland for one year following an application of ForeFront R&P. Cereals and corn can be planted one year after treatment. Most broadleaf crops are more sensitive and can require **at least** 2 years depending on the crop and environmental conditions. 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 grasses:**
 - **Preemergence:** Grasses may be reseeded in the fall following an application of ForeFront R&P applied in the spring or early summer.
 - **Postemergence:** 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*), 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.
- **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.
- **Grazing and Haying Restrictions:** There are no restrictions on grazing or hay harvest following application of ForeFront R&P at labeled rates. Do not harvest forage for hay within 7 days of ForeFront R&P application. Cutting hay too soon after spraying weeds can compromise the weed control. Wait 14 days prior to cutting grass hay to allow for maximum herbicide activity. Do not transfer grazing animals 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.
- **Grazing Poisonous Plants:** Herbicide application may increase palatability of certain poisonous plants. Do not graze treated areas until poisonous plants are dry and no longer palatable to livestock.
- **Restrictions in Hay or Manure Use:**
 - Do not use treated plant residues, including hay or straw from areas treated within the preceeding 18-months, in compost, mulch or mushroom spawn .
 - Do not use manure from animals that have grazed forage or eaten hay harvested from treated areas within the previous 3 days, in compost, mulch or mushroom spawn.
 - 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 eaten hay harvested from aminopyralid-treated areas within the previous 3 days may only be used on pasture grasses, grass grown for seed, and wheat and corn.
 - Do not plant a broadleaf crop (including soybeans, sunflower, tobacco, vegetables, field beans, peanuts, and potatoes) in fields treated with manure from animals that have grazed forage or eaten hay harvested from aminopyralid-treated areas until an adequately sensitive field bioassay is conducted to determine that the aminopyralid concentration in the soil is at level that is not injurious to the crop to be planted.
 - Do not plant a broadleaf crop in fields treated in the previous year with manure from animals that have grazed forage or eaten 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.

- **Field Bioassay Instructions:** In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample variability in field conditions such as soil texture, soil organic matter, soil pH, rainfall pattern or drainage. The field bioassay can be initiated at any time between harvest of the treated crop and the planting of the intended rotational crop. 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 there is apparent herbicidal activity, do not plant the field to the intended rotational crop; plant only to wheat, forage grasses, native grasses or grasses grown for hay.
- **ForeFront R&P is highly active against many broadleaf plant species.** Do not use this product on areas where loss of desirable broadleaf forage plants, including legumes, cannot be tolerated.
- Trees adjacent to or in a treated area can occasionally be affected by root uptake of ForeFront R&P through movement into the soil. Do not apply ForeFront R&P within the root zone of desirable trees unless such injury can be tolerated. Use special caution near roses, and leguminous trees such as locusts, redbud, mimosa, and caragana.

Sprayer Clean-Out Instructions

It is recommended that separate spray equipment be used on highly sensitive crops such as tobacco, soybeans, peanuts, and tomatoes.

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 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

Apply the recommended rate of ForeFront R&P as a coarse low-pressure spray. **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.**

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. To enhance foliage wetting and coverage, an approved non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant label.

Ground Broadcast Application: Higher spray volumes (greater than 10 gallons per acre) generally provides better coverage and better control, particularly in dense and/or tall foliage.

Aerial Broadcast Application: Do not apply less than 2 gallons per acre total spray volume. Five gallons per acre or greater will generally provide better coverage and better control, particularly in dense and/or tall foliage.

High-Volume Foliar Application: High volume foliar treatments may be applied at rates equivalent 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.

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. 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 (see comments in the Use Precautions and Restrictions section above on Maximum Application Rate).

Table 1: 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)	(mL)
24	1.5	0.55	16.3
32	2	0.74	21.7
42	2.6	0.96	28.5

Note: 1 mL = 1cc and 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).

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.

Addition of Surfactants or Adjuvants on All Labeled Use Sites: The addition of a high quality non-ionic surfactant (of at least 80% active ingredient) 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 plant surfaces) or when weeds are heavily pubescent or more mature.

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, and (3) that the tank mix combination is physically compatible (see tank mix compatibility testing below). When tank mixing, use only in accordance with the restrictions, precautions and limitations on the respective product labels

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not exceed recommended application rates. If products containing the same active ingredient are mixed, do not exceed the maximum allowable active ingredient use rates.
- For direct injection or other spray equipment where the product formulations will be mixed in undiluted form, special care should be taken to ensure tank mix compatibility.

- Always perform a jar test to ensure the compatibility of products to be used in tank mixture.

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: Perform a jar test 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.

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.

Note: Foliar-applied liquid fertilizers themselves can cause injury (such as: yellowing and burning) to the foliage of forage grasses and other vegetation especially in the summer. The addition of a surfactant to fertilizer blends may increase the injury potential.

Use Rates and Timing

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

ForeFront R&P may be applied postemergence as a broadcast spray or as a spot application to control weeds listed on this label; weeds other than those listed may also be controlled by this herbicide. 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) or for longer residual control. 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 susceptible weeds and re-growth of certain perennial 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 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, biological control agents, replanting, fertilization, prescribed fire, reseeding with desirable plants, 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, and 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 or when residual control is important. ForeFront R&P also provides preemergence control of germinating seeds or emerged seedlings of susceptible weeds following application.

Table 2: Broadleaf Weeds Controlled

Weed Species			
Common Name	Scientific Name	Life Cycle***	Plant Family
Rate Range: 1.5 to 2 pints/acre			
bedstraw	<i>Galium spp.</i>	perennial	Rubiaceae
bedstraw, smooth	<i>Galium mollugo</i>	perennial	Rubiaceae
carrot, wild*	<i>Daucus carota</i>	biennial	Apiaceae
Cinquefoil, hoary	<i>Potentilla argentea</i>	perennial	Rosaceae
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>Securigera varia</i>	perennial	Fabaceae
daisy, oxeye*,**	<i>Leucanthemum vulgare</i>	perennial	Asteraceae
falsedandelion, Carolina*	<i>Pyrhopappus carolinianus</i>	annual/biennial	Asteraceae
gumweed, curlycup	<i>Grindelia squarrosa</i>	biennial	Asteraceae
horsenettle, Carolina*,**	<i>Solanum carolinense</i>	perennial	Solanaceae
jimsonweed	<i>Datura stramonium</i>	annual	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, plumeless*,**	<i>Carduus acanthoides</i>	biennial	Asteraceae
thistle, scotch	<i>Onopordum acanthium</i>	biennial	Asteraceae
tickclover	<i>Desmodium sp.</i>	perennial	Fabaceae
vetch, 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>Amphiachyris 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
deadnettle, purple	<i>Lamium purpureum</i>	annual/biennial	Lamiaceae
dock, broadleaf*	<i>Rumex obtusifolius</i>	perennial	Polygonaceae
dock, curly*	<i>Rumex crispus</i>	perennial	Polygonaceae
dogfennel***	<i>Eupatorium capillifolium</i>	perennial	Asteraceae
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
fireweed	<i>Epilobium angustifolium</i>	perennial	Onagraceae
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	<i>Centaurea sp.</i>	biennial	Asteraceae
knapweed, brown	<i>Centaurea jacea</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
lespedeza, annual	<i>Lespedeza striata</i>	annual	Fabaceae
lettuce, prickly*	<i>Lactuca serriola</i>	annual	Asteraceae
locust	<i>Robinia pseudoacacia</i>	perennial	Fabaceae
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

mullein****	<i>Verbascum spp.</i>	biennial	Scrophulariaceae
mugwort	<i>Artmeisia vulgaris</i>	Perennial	Asteraceae
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
smartweed, Pennsylvania	<i>Polygonum pennsylvanicum</i>	annual	Polygonaceae
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
Spanish needles	<i>Bidens bipinnata</i>	annual	Asteraceae
starthistle, yellow*,**	<i>Centaurea solstitialis</i>	annual	Asteraceae
sunflower, common*	<i>Helianthus annua</i>	annual	Asteraceae
teasel*	<i>Dipsacus spp.</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

*These plants 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.

**** apply during rosette stage

Susceptible Brush such as Multiflora rose:

Individual Plant Treatment - Use 32 fl oz (0.25% v/v) of ForeFront R&P tank-mixed with Remedy® Ultra at 32 fl oz (0.25% v/v). Apply from full leaf through flowering. For best results, delay treatment for 9-12 months after mowing. Spot treatments may be applied at an equivalent broadcast rate of up to 84 fl oz of ForeFront R&P per acre per annual growing season; however, not more than 50% of an acre may be treated at that rate.

Broadcast - Use 32 to 42 fl oz of ForeFront R&P tank mixed with Remedy Ultra at 16 to 32 fl oz. Apply from full leaf through flowering. For best results, delay treatment for 9-12 months after mowing.

Spray Drift Management

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.

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, 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 nontarget species, nontarget 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, fruit trees, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that may not be visible may injure susceptible broadleaf plants.

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.

Aerial Application

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.

Ground Boom Application

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

Non-Cropland and Natural Areas**Restrictions:**

Postemergence (annual and perennial weeds):

- Limited to 2 applications per year
- Maximum of 42 fl oz (0.87 lbs ae/acre 2,4-D)/acre per application
- Minimum of 30 days between application

Postemergence (woody plants)

- Limited to 1 application per year
- Maximum of 42 fl oz (0.87 lbs ae/acre 2,4-D)/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 purposes.

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.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. To the extent permitted by law, otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent permitted by law, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in

writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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EPA accepted: 08/04/11

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

ForeFront® R&P

EPA Reg. No. 62719-524

For Distribution and Use Only in AL, AR, AZ, CO, FL, GA, ID, KS, KY, LA, MO, MS, MT, ND, NE, NV, NM, OK, SD, TN, TX, UT, WY

For Use on Grass Harvested for Hay Intended for Distribution or Sale Off the Farm or Ranch

For Use on Grass Harvested for Silage, Haylage, Baylage, or Green Chop Intended for Use On the Farm or Ranch

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for ForeFront® R&P herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of ForeFront R&P according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for ForeFront R&P.

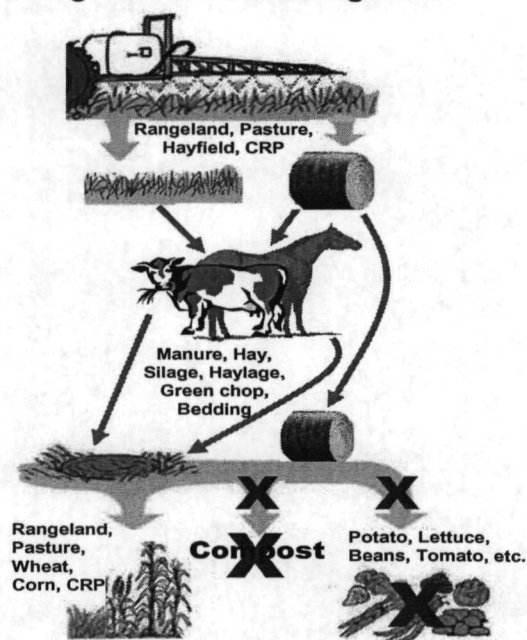
Use Precautions and Restrictions

Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions." Call (1-800-263-1196) for more information.

IMPORTANT USE PRECAUTIONS AND RESTRICTIONS TO PREVENT INJURY TO DESIRABLE PLANTS

- It is mandatory to follow the "**Use Precautions and Restrictions**" section of this product label.
- Manure and urine from animals consuming treated grass or forage may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- The Applicator must provide the land manager with a copy of the Dow AgroSciences Stewardship instructions regarding uses of forage from areas treated with aminopyralid.
- A printable version of the stewardship instructions can be found at www.aminopyralidstewardshipinstructions.com

Forage and Manure Management



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- **Do not use grasses treated with ForeFront R&P in the preceding 18-months for hay intended for export outside the United States.**
- **Do not use hay or straw from areas treated with ForeFront R&P within the preceding 18-months, or manure from animals feeding on hay treated with ForeFront R&P, in compost.**
- **Do not use grasses treated within the preceding 18-months for seed production.**
- **Grazing and Haying Restrictions:** There are no restrictions on grazing or hay harvest following application of ForeFront R&P at labeled rates. Do not harvest forage for hay within 7 days of ForeFront R&P application. Cutting hay too soon after spraying weeds can compromise the weed control. Wait 14 days prior to cutting grass hay to allow for maximum herbicide activity.
- **Transfer of Animals Feeding on ForeFront R&P-Treated Forage:** Do not transfer animals grazing or feeding on hay 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.
- **Grazing Poisonous Plants:** Herbicide application may increase palatability of certain poisonous plants. Do not graze treated areas until poisonous plants are dry and no longer palatable to livestock.
- **Restrictions in Hay or Manure Use:**
 - Do not use treated plant residues, including hay or straw from areas treated within the preceding 18-months, in compost, mulch or mushroom spawn.
 - Do not use manure from animals that have grazed forage or eaten hay harvested from treated areas within the previous 3 days, in compost, mulch or mushroom spawn.
 - 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 eaten hay harvested from aminopyralid-treated areas within the previous 3 days may only be used on pasture grasses, grass grown for seed, wheat, and corn.
 - Do not plant a broadleaf crop (including soybeans, sunflower, tobacco, vegetables, field beans, peanuts, and potatoes) in fields treated with manure from animals that have grazed forage or eaten hay harvested from aminopyralid-treated areas until an adequately sensitive field bioassay is conducted to determine that the aminopyralid concentration in the soil is at level that is not injurious to the crop to be planted.
 - Do not plant a broadleaf crop in fields treated in the previous year with manure from animals that have grazed forage or eaten 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.
- **Preharvest Interval:** Do not cut forage for hay within 7 days of application. For program lands, such as CRP, 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.
- **Chemigation:** Do not apply this product through any type of irrigation system.

- **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.
- **Field Bioassay Instructions:** In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample variability in field conditions such as soil texture, soil organic matter, soil pH, rainfall pattern or drainage. The field bioassay can be initiated at any time between harvest of the treated crop and the planting of the intended rotational crop. 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 there is apparent herbicidal activity, do not plant the field to the intended rotational crop; plant only to wheat, forage grasses, native grasses or grasses grown for hay.
- **ForeFront R&P is highly active against many broadleaf plant species.** Do not use this product on areas where loss of desirable broadleaf forage plants, including legumes, cannot be tolerated.
- Trees adjacent to or in a treated area can occasionally be affected by root uptake of ForeFront R&P through movement into the soil. Do not apply ForeFront R&P within the root zone of desirable trees unless such injury can be tolerated. Use special caution near roses, and leguminous trees such as locusts, redbud, mimosa, and caragana.

Expiration Date: August 10, 2014

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R881-003

EPA Accepted: 08/04/11

Replaces: Initial