



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

APR 5 2007

John J. Jachetta, Ph.D.  
Regulatory Leader  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

RE: Notification of Minor Label Changes  
EPA Registration Number: 62719-537  
Date of Submission: January 31, 2007

Dear Dr. Jachetta:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated for the product Milestone™ VM. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

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United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number Dow AgroSciences/62719-537	2. EPA Product Manager Joanne I. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/Milestone™ VM	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. _____ Product Name _____	

**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.

**NOTIFICATION**  
 APR 5 - 2007

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

The following changes have been made by notification:

- Added the following statement to base label, cover and booklet: Not For Sale, Distribution, or Use in New York State.
- Removed restriction prohibiting use in Nassau and Suffolk counties.

**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
* Certification must be submitted			If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt
					No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
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) 337-4386
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 <b>(Stamped)</b>
2. Signature <i>John J. Jachetta</i>	3. Title Regulatory Manager	
4. Typed Name John J. Jachetta, Ph.D. ™Trademark of Dow AgroSciences LLC	5. Date January 31, 2007	

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(Base label):

**NOTIFICATION**

APR 5 - 2007

# Milestone™ VM

## Specialty Herbicide

For control of susceptible weeds and certain woody plants, including many invasive and noxious weeds, on non-cropland areas including industrial sites, rights-of-way (such as roadsides, electric utility and communication transmission lines, pipelines, and railroads), 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.

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- .....	40.6%
Other Ingredients .....	59.4%
Total.....	100.0%

Acid Equivalent: aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) - 21.1% - 2 lb/gal


[Editor's Note: The following Container Use Directions should be included on the label for product that is packaged in a 1 quart Tip and Dispense bottle]

**1 - Tip**




Tilt container to angle as shown and fill head to desired amount - use vertical scale for measuring. Container should be closed.

**2 - Level**



Hold container up-right and check the amount for accuracy. Add or subtract as needed, using pour-back scale as guide.

**3 - Dispense**



Remove cap on head and pour into sprayer or other devices. No fluid will pour from the main container. Replace cap for storage in sealed condition.

Keep Out of Reach of Children

## CAUTION

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### Precautionary Statements

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#### Hazard to Humans and Domestic Animals

Causes Moderate Eye Irritation

Avoid contact with eyes or clothing.

#### Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

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.

### 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.

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

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.

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](http://www.dowagro.com).

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

EPA Reg. No. 62719-537

EPA Est. \_\_\_\_\_

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

Net Contents \_\_\_\_

(cover):

# Milestone™ VM

## Specialty Herbicide

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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- .....	40.6%
Other Ingredients .....	59.4%
Total.....	100.0%

Acid Equivalent: aminopyralid (2-pyridine carboxylic acid, 4-amino-3,6-dichloro-) - 21.1% - 2 lb/gal

**Keep Out of Reach of Children**

## CAUTION

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.

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EPA Reg. No. 62719-537

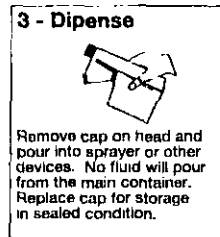
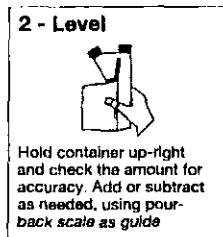
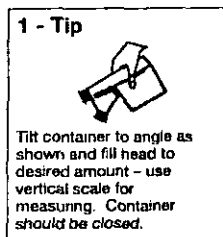
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Net Contents \_\_\_\_\_

(Page 1 through end):

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## Precautionary Statements

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### Hazards to Humans and Domestic Animals

## CAUTION

**Causes Moderate Eye Irritation**

**Avoid contact with eyes or clothing.**

### Personal Protective Equipment (PPE)

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Shoes plus socks

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.

### 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.

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

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.

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### Directions for Use

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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.**

**Entry Restrictions:** For applications on 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 active ingredient 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.

Milestone™ VM specialty herbicide may be applied by aerial or ground equipment to control susceptible weeds and certain woody plants, including invasive and noxious weeds on non-cropland areas including industrial sites, rights-of-way (including roadsides, electric utility and communication transmission lines, pipelines, and railroads), non-irrigation ditch banks, natural areas (including wildlife management areas, wildlife openings, wildlife habitats, recreation areas, campgrounds, trailheads and trails), and grazed areas in and around these sites without injury to most grasses.

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. Milestone VM can be used to the waters edge. Do not apply directly to water and take precautions to minimize spray drift onto water.

**Resistance Management Guidelines**

- Development of plant populations resistant to this herbicide mode of action is usually not a problem on non-cropland sites since these sites receive infrequent pesticide applications.
- 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 labeled 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.**
- **Maximum Application Rate:** On all labeled use sites do not broadcast apply more than 7 fl oz per acre of Milestone VM per year. The total amount of Milestone VM applied broadcast, as a re-treatment, and/or spot treatment cannot exceed 7 fl oz per acre per year. Spot treatments may be applied at an equivalent broadcast rate of up to 0.22 lb acid equivalent (14 fl oz of Milestone VM) per acre per annual growing season; however, not more than 50% of an acre may be treated at that rate. Do not apply more than a total of 0.11 lb acid equivalent (7 fl oz per acre of Milestone VM) per annual growing season as a result of broadcast, spot or repeat applications.
- **Avoiding Injury to Non-Target Plants:** Do not aerially apply Milestone VM within 50 feet of a border downwind (in 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 because very small quantities of spray may seriously injure susceptible crops. Read and consider the "Precautions for Avoiding Spray Drift and Spray Drift Advisory" at the end of the label to help minimize the potential for spray drift.

- **Milestone VM is highly active against many broadleaf plant species.** Do not use this product on areas where loss of desirable broadleaf 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.
- **Milestone VM should not be applied on residential or commercial lawns or ornamental plantings.**
- Trees adjacent to or in a treated area can occasionally be affected by root uptake of Milestone VM. Do not apply Milestone VM 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.
- **Seeding grasses:**
  - **Preemergence:** Milestone VM may be applied in the spring or early summer, depending on the target weed species, and grass planted the following fall or winter when appropriate for the grass species being planted.
  - **Postemergence:** During the season of establishment, Milestone VM should be applied only after perennial grasses are well established (have developed a secondary root system and are vigorous. Most perennial grasses are tolerant to Milestone VM at this stage of development. Milestone VM 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 or Susceptible Wildflowers:** Do not plant legumes or susceptible wildflowers until a soil bioassay has been conducted to determine if residues of Milestone VM remaining in the soil will adversely affect establishment of legumes and wildflowers.
- **Grazing and Haying Restrictions:** There are no restrictions on grazing or hay harvest following application of Milestone VM at labeled rates. Cutting hay too soon after spraying weeds will reduce weed control. Wait 14 days after herbicide application to cut grass hay to allow herbicide to work. Do not transfer grazing animals from areas treated with Milestone VM to areas where sensitive broadleaf crops occur without first allowing 3 days of grazing on an untreated pasture. Otherwise, urine and manure may contain enough Milestone VM to cause injury to broadleaf plants.
- **Milestone VM in Plant Residues or Manure:**
  - Do not use Milestone VM-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 as compost or mulch that will be applied to areas where commercially grown mushrooms or susceptible 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 susceptible broadleaf crops.
  - Manure from animals that have grazed forage or eaten hay harvested from Milestone VM-treated areas within the previous 3 days may only be spread 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 eaten hay harvested from Milestone VM-treated areas until an adequately sensitive field bioassay is conducted to determine that the Milestone VM residues in the soil is at a 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 Milestone VM in plant residues or manure is more rapid under warm, moist soil conditions and may be accelerated by supplemental irrigation.



- **Crop Rotation:** Do not rotate non-cropland to cropland for one year following an application of Milestone VM. 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 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, rainfall pattern or drainage. The field bioassay can be initiated at any time after application and before the planting of the intended species. Observe the seeded species for symptoms of herbicidal activity, such as poor stand (effect on seed germination), chlorosis (yellowing), necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the intended seeded species may be planted. If herbicidal activity is observed, do not plant the field to the intended seeded species, plant only to wheat, forage grasses, native grasses or grasses grown for hay.

### **Sprayer Clean-Out Instructions**

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

Do not use spray equipment used to apply Milestone VM for other applications to land planted to, or to be planted to, broadleaf plants unless it has been determined that all residues of this herbicide has been removed by thorough cleaning of equipment.

Equipment used to apply Milestone VM 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**

Apply the specified rate of Milestone VM as a coarse low-pressure spray. Do not apply this product with mist blower systems that deliver very fine spray droplets. 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 specified 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 broadcast up to a maximum of 7 fl oz per acre per annual growing season. Use sufficient spray volume to thoroughly and uniformly wet foliage and stems but not to runoff.

**Spot Application:** Spot treatments may be applied at an equivalent broadcast rate of up to 0.22 lb acid equivalent (14 fl oz of Milestone VM) per acre per annual growing season; however, not more than 50% of an acre may be treated at that rate. Do not apply more than a total of 0.11 lb acid equivalent (7 fl oz per acre of Milestone VM) per annual growing season as a result of broadcast, spot or repeat applications. Spray volume should be sufficient to thoroughly and uniformly wet weed foliage but not to the point of runoff.

Repeat treatments may be made, but the total amount of Milestone VM applied must not exceed 7 fl oz per acre per year. To prevent misapplication, spot treatments should be applied with a calibrated-sprayer.

Note: Table 1 below shows mixes for various sprayer outputs in gallons per acre (GPA).

Table 1: Amount of Milestone VM herbicide (in mL) to mix in 1 gallon of water

Milestone VM amount (in mL) to mix with various application rates			
GPA	5 fl oz/a	7 fl oz/a	14 fl oz/a
20	7.5	10.5	21.0
30	5.0	7.0	14.0
40	3.8	5.3	10.5
50	3.0	4.2	8.4
60	2.5	3.5	7.0
70	2.1	3.0	6.0
80	1.9	2.6	5.3
90	1.7	2.3	4.7
100	1.5	2.1	4.2

Use a syringe to measure cc

**Conversions:**

1 tsp = 5 mL    30 mL = 1 fluid ounce    1 cc = 1 mL  
 3 tsp = 1 Tbsp    2 Tbsp = 1 fluid ounce

Table 2: Application rates in the table below are based on treating an area of 1000 sq ft. An area of 1000 sq ft is about 31.5 ft by 31.5 ft (10.5 by 10.5 yards) in size. Mix the amount of Milestone VM (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 to 2.5 gallons per 1000 sq ft is equivalent to 22 to 109 gallons per acre.

Amount of Milestone VM per 1000 sq ft to Equal Broadcast Rate		
Broadcast Rate (fl oz/acre)	Amount of Milestone VM per 1000 sq ft	
	(fl oz)	(Milliliters)
3	0.069	2
5	0.115	3.4
7	0.161	4.8

**Note:** 1 mL = 1 cc and 1 fluid ounce (fl oz) = 29.6 milliliters (mL) = 2 tablespoons = 6 teaspoons

**To calculate the amount of Milestone VM 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 specified amount of Milestone 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:** For post emergent applications, a 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:** Milestone at rates of up to 7 fl oz per acre may be mixed with labeled rates of other herbicides registered for application on all labeled use sites. Milestone 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 specified 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 Mix Compatibility Testing:** Perform a jar test prior to mixing in a spray tank to ensure compatibility of Milestone 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 remix 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 aid may resolve mix incompatibility. If the mixture is incompatible do not use that tank mix partner in tank mixtures.

**Mixing with Sprayable Liquid Fertilizer Solutions:** Milestone is usually compatible with liquid fertilizer solutions. It is anticipated that Milestone 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.

**Note:** The lower the temperature of the liquid fertilizer, the greater the likelihood of mixing problems. Use of a compatibility aid may be required if Milestone is mixed with a 2,4-D-containing product and liquid fertilizer. **Mixing Milestone and 2,4-D 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 yellowing of the foliage of forage grasses and other vegetation.

Milestone VM may be applied to all labeled use sites as an aerial or ground broadcast treatment, as a spot or high volume foliar application, to control susceptible weeds and certain woody plants, including invasive weeds (see Weeds Controlled section).

**Do not use Milestone VM if loss of legumes species or other broadleaf species cannot be tolerated.**

Milestone VM may be applied post emergence as a broadcast spray or as a spot application to control weeds including, but not limited to, those listed on this label. When a rate range is given use the higher rate to control weeds at advanced growth stages, or under less than favorable growing conditions, or for longer residual control. Best results are obtained when spray volume is sufficient to provide uniform coverage of treated weeds. For optimum uptake and translocation of Milestone, avoid mowing, haying, shredding, burning or soil disturbance in treated areas for at least 14 days following application.

Milestone VM also provides preemergence control of emerging seedlings of susceptible weeds, and re-growth of certain perennial weeds following application. Preventing establishment of weeds will depend upon application rate, season of application, and environmental conditions after application.

Milestone VM can provide long-term control of susceptible 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 weed control is most effective where grass vegetation is allowed to recover from overgrazing, drought, etc., and compete with weeds.

Milestone VM can be an important component of integrated vegetation management programs designed to renovate or restore desired plant communities. To maximize and extend the benefits of weed control provided by Milestone VM, it is important that other vegetation management practices, including proper grazing management, biological control agents, replanting, fertilization, prescribed fire, etc., be used in appropriate sequences and combinations to further alleviate the adverse effects of weeds on desirable plant species and to promote development of desired plant communities. Agricultural and natural resources specialists with federal and state government agencies can provide guidance on best management practices and development of integrated vegetation management programs.

### Weeds Controlled

The following weeds will be controlled with the rates of Milestone VM indicated in table 3. For best results, most weeds should be treated when they are actively growing and under conditions favorable for growth. Use a higher rate in the rate range when growing conditions are less than favorable or when weed foliage is tall and dense or when residual control is desired. Milestone VM also provides preemergence control of germinating seeds and control of emerged seedlings of susceptible weeds following application.

Table 3: Weeds Controlled

**Note:** Numbers in parentheses (-) refer to specific use directions for a particular weeds species.

Common Name	Scientific Name	Rate Range (fl oz/acre)	Life Cycle	Plant Family
amaranth, spiny	<i>Amaranthus spinosus</i>	4 to 7	annual	Amaranthaceae
bedstraw	<i>Galium spp.</i>	4 to 7	perennial	Rubiaceae
beggarticks	<i>Bidens spp.</i>	4 to 7	annual	Asteraceae
broomweed, annual	<i>Amphiachyris dracunculoides</i>	4 to 7	annual	Asteraceae
burdock, common*, **	<i>Arctium minus</i>	4 to 7	biennial	Asteraceae
buttercup, hairy*	<i>Ranunculus sardous</i>	4 to 7	annual	Ranunculaceae
buttercup, tall*, **	<i>Ranunculus acris</i>	4 to 7	perennial	Ranunculaceae
camelthorn	<i>Alhagi pseudalhagi</i>	5 to 7	perennial	Fabaceae
chamomile, scentless	<i>Matricaria inodora</i>	4 to 7	annual	Asteraceae
chicory*	<i>Cichorium intybus</i>	4 to 7	perennial	Asteraceae
chickweed	<i>Stellaria media</i>	7	annual	Caryophyllaceae
cinquefoil, sulfur (1)*, **	<i>Potentilla recta</i>	4 to 7	perennial	Rosaceae

cocklebur	<i>Xanthium strumarium</i>	3 to 5	annual	Asteraceae
clover	<i>Trifolium spp.</i>	5 to 7	perennial	Fabaceae
croton, tropic	<i>Croton glandulosus</i>	3 to 5	annual	Euphorbiaceae
crownvetch	<i>Securigera varia</i>	5 to 7	perennial	Fabaceae
cudweed, purple	<i>Gnaphalium purpureum</i>	4 to 7	annual	Asteraceae
daisy, oxeye (1)*, **	<i>Leucanthemum vulgare</i>	4 to 7	perennial	Asteraceae
dock, curly*	<i>Rumex crispus</i>	4 to 7	perennial	Polygonaceae
evening primrose, cutleaf	<i>Oenothera laciniata</i>	4 to 7	annual	Onagraceae
fiddleneck, common	<i>Amsinckia intermedia</i>	7	annual	Boraginaceae
fireweed	<i>Epilobium angustifolium</i>	5 to 7	perennial	Onagraceae
fleabane, flax-leaf	<i>Conyza bonariensis</i>	4 to 7	annual	Asteraceae
hawkweed, orange (2)*, **	<i>Hieracium aurantiacum</i>	4 to 7	perennial	Asteraceae
hawkweed, yellow (2)*, **	<i>Hieracium caespitosum</i>	4 to 7	perennial	Asteraceae
henbit*	<i>Lamium amplexicaule</i>	5 to 7	annual/ biennial	Lamiaceae
horsenettle, Carolina**	<i>Solanum carolinense</i>	4 to 7	perennial	Solanaceae
horseweed (marestail)	<i>Conyza canadensis</i>	4 to 7	annual	Asteraceae
ironweed, tall	<i>Vernonia gigantea</i>	5 to 7	perennial	Asteraceae
ironweed, western	<i>Vernonia baldwinii</i>	7	perennial	Asteraceae
knapweed, diffuse (3)*, **	<i>Centaurea diffusa</i>	5 to 7	biennial/ perennial	Asteraceae
knapweed, Russian (4)*, **	<i>Acroptilon repens</i>	5 to 7	perennial	Asteraceae
knapweed, spotted (3)*, **	<i>Centaurea stoebe</i>	5 to 7	biennial/ perennial	Asteraceae
knapweeds	<i>Centaurea spp.</i>	5 to 7	biennial/ perennial	Asteraceae
kudzu*, **	<i>Pueraria montana</i>	7	perennial	Fabaceae
lady's thumb*	<i>Polygonum persicaria</i>	3 to 5	annual	Polygonaceae
lambsquarters	<i>Chenopodium album</i>	5 to 7	annual	Chenopodiaceae
lespedeza, annual	<i>Lespedeza striata</i>	5 to 7	annual	Fabaceae
locust, black	<i>Robinia pseudoacacia</i>	7	woody perennial	Fabaceae
locust, honey	<i>Gleditsia triacanthos</i>	7	woody perennial	Fabaceae
mayweed, scentless*	<i>Tripleurospermum perforata</i>	4 to 7	annual	Asteraceae
mayweed, stinking*, **	<i>Anthemis cotula</i>	7	annual	Asteraceae
medic, black*	<i>Medicago lupulina</i>	4 to 6	perennial	Fabaceae
mimosa	<i>Albizia julibrissin</i>	7	woody perennial	Fabaceae
mullein (5)	<i>Verbascum spp.</i>	7	biennial	Scrophulariaceae
ox tongue, bristly	<i>Picris echioides</i>	5 to 7	biennial	Asteraceae
ragweed, common**	<i>Ambrosia artemisiifolia</i>	3 to 5	annual	Asteraceae
ragweed, western	<i>Ambrosia psilostachya</i>	4 to 7	perennial	Asteraceae
ragwort, tansy*, **	<i>Senecio jacobaea</i>	5 to 7	perennial	Asteraceae
redbud	<i>Cercis Canadensis</i>	7	woody perennial	Fabaceae
rose	<i>Rosa spp.</i>	7	Woody perennial	Rosaceae
rush skeletonweed	<i>Chondrilla juncea</i>	5 to 7	perennial	Asteraceae
smartweed, Pennsylvania	<i>Polygonum pennsylvanicum</i>	3 to 5	annual	Polygonaceae

sneezeweed, bitter	<i>Helenium amarum</i>	4 to 7	annual	Asteraceae
soda apple, tropical (6)*, **	<i>Solanum viarum</i>	5 to 7	perennial	Solanaceae
sowthistle, perennial*, **	<i>Sonchus arvensis</i>	3 to 5	perennial	Asteraceae
spanishneedles	<i>Bidens bipinnata</i>	4 to 7	annual	Asteraceae
star-thistle, Malta (7)*, **	<i>Centaurea melitensis</i>	3 to 5	annual	Asteraceae
starthistle, purple (7)*, **	<i>Centaurea calcitrapa</i>	3 to 5	biennial	Asteraceae
star thistle, yellow (7)*, **	<i>Centaurea solstitialis</i>	3 to 5	annual	Asteraceae
St. Johnswort, common	<i>Hypericum perforatum</i>	5 to 7	perennial	Clusiaceae
sunflower, common	<i>Helianthus annuus</i>	4 to 7	annual	Asteraceae
teasel	<i>Dipsacus spp.</i>	4 to 7	biennial	Dipsacaceae
thistle, artichoke	<i>Cynara cardunculus</i>	5 to 7	perennial	Asteracea
thistle, bull (8)*, **	<i>Cirsium vulgare</i>	3 to 5	biennial	Asteraceae
thistle, Canada (9)*, **	<i>Cirsium arvense</i>	5 to 7	perennial	Asteraceae
thistle, woolly distaff	<i>Carthamus lanatus</i>	4 to 7	annual	Asteraceae
thistle, Italian	<i>Carduus pycnocephalus</i>	7	annual	Asteraceae
thistle, musk (8)*, **	<i>Carduus nutans</i>	3 to 5	biennial	Asteraceae
thistle, plumeless (8)*, **	<i>Carduus acanthoides</i>	3 to 5	biennial	Asteraceae
thistle, Scotch*, **	<i>Onopordum acanthium</i>	5 to 7	biennial	Asteracea
vetch	<i>Vicia spp.</i>	3 to 7	perennial	Fabaceae
wisteria	<i>Wisteria brachybotris</i>	7	woody perennial	Fabaceae
wormwood, absinth(10)*, **	<i>Artemisia absinthium</i>	6 to 7	perennial	Asteraceae
yarrow, common	<i>Achillea millefolium</i>	7	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>).

- (1) **Sulfur cinquefoil or oxeye daisy:** Apply Milestone at 4 to 6 fl oz per acre to plants in the prebud stage of development.
- (2) **Orange or yellow hawkweeds:** Apply Milestone at 4 to 7 fl oz per acre to plants in the bolting stage of development.
- (3) **Diffuse and spotted knapweeds:** Apply Milestone at 5 to 7 fl oz per acre when plants are actively growing with the optimum time of application occurring from rosette to the bolting stages of development or in the fall. Plants will be controlled by mid-summer and fall applications even though plants may not show any changes in form or stature the year of application.
- (4) **Russian knapweed:** Apply Milestone at 5 to 7 fl oz per acre to plants in the spring and summer to plants from early bud to flowering stage and to dormant plants in the fall.
- (5) **Mullein:** Apply to the rosette stage
- (6) **Tropical soda apple:** Apply Milestone at 5 to 7 fl oz per acre at any growth stage, but application by flowering will reduce seed production potential.
- (7) **Malta, purple, and Yellow starthistle:** Apply Milestone at 3 to 5 fl oz per acre to plants at the rosette through bolting growth stages.
- (8) **Bull, musk, and plumeless thistles:** Apply Milestone at 3 to 5 fl oz per acre in the spring and early summer to rosette or bolting plants or in the fall to seedlings and rosettes. Apply at 4 to 5 fl oz when plants are at the late bolt through early flowering growth stages. 2,4-D at 1 lb ae/acre should be tank-mixed with Milestone starting at the late bud stages
- (9) **Canada thistle:** Apply Milestone at 5 to 7 fl oz per acre either in the spring to plants in the prebud to early bud growth stage – the goal is to insure all plants have emerged. Applications are also effective in the fall before a killing frost.
- (10) **Absinth wormwood:** Apply 6 to 7 fl oz per acre before wormwood is 12 inches tall. When applying by air on CRP, coverage is important and a minimum of 3 GPA is specified. Remove old duff and litter by fire or mowing for best results

## 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 injure susceptible crops. This product should be applied only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, 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 reduced 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 specified 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 85% of the rotor diameter.
2. Nozzles should be pointed backward parallel with the air stream or not pointed downwards more than 45 degrees.

State regulations must be followed.

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 specified 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** - Orient nozzles so that the spray is released parallel to the airstream to produce larger droplets than other orientations. 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 75% of wingspan or 85% of the rotor diameter 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 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.

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### Terms and Conditions of Use

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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. 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.

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### Warranty Disclaimer

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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. Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

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### Inherent Risks of Use

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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. All such risks shall be assumed by buyer.

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### **Limitation of Remedies**

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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.

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308/2E  
January 31, 2007



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

MILESTONE VM (AI: AMINOPYRALID)  
EPA REGISTRATION NUMBER: 62719-537  
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of Milestone<sup>TM</sup> VM specialty herbicide based on EPA-accepted label dated January 26, 2007. The following changes have been made by notification:

1. Added the following statement to base label, cover and booklet: Not For Sale, Distribution, or Use in New York State.
2. Removed restriction prohibiting use in Nassau and Suffolk counties.

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 Milestone VM (LIB / Milestone VM / Notif / 01-31-07)  
(15 Pages plus Registration Notes) (5 Copies)

If you require further information, please contact Amy Hudson, Regulatory Specialist at 317-337-3967 or Joyce Carroll, Registration Assistant for this product, at 317-337-4631.

Sincerely,

A handwritten signature in black ink that reads "Amy Hudson" followed by a stylized flourish.

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

JJJ/akh  
Enclosures