

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

AUG - 4 2011

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

Subject: Label Amendment Revising Hay and Grass Restrictions to Specify an 18-Month Interval and Making Other Minor Changes.

Milestone® VM

EPA Reg. No. 62719-537

Your Submission, Dated June 16, 2011, as Amended by Email July 28, 2011

Dear Dr. Jachetta:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely

FOR I

Kathryn Montague Product Manager 23 Herbicide Branch

Registration Division (7505P)

Enclosure

L1B / Milestone VM / Amend / 07-28-11 file: Milestone VM-537 MSTR 28Jul11d.docx

### Milestone® VM

EPA Reg. No. 62719-537

#### Registration Notes:

**Source section 3 labeling** based on EPA accepted label dated December 4, 2009. Following are changes by amendment:

- 1. Add the following to cover, base label and booklet: Hay from grass treated with Milestone VM within the preceding 18-months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling.
- 2. Revise advisory text and pictogram.
- 3. Add Groundwater Advisory to Environmental Hazards
- 4. Restrictions:
  - a. add restrictions for on and off farm hay
  - b. moved restrictions for hay and seed production
  - c. add reference to supplemental label for hay and silage
  - d. revise restriction on residential or commercial lawn to add specific sites
  - e. add advisory for applications made during period of intense rainfall
  - f. Seeding Grasses: change subheading to "Grass Revegetation: and added section on Application before seeding grasses" to replace the "Preemergence" section; change "Postemergence" subheading to "Postemergence application on grasses."
- 5. Restrictions in Hay or Manure Use:
  - a. revise subheading from "Plant Residues or Manure" to "Restrictions in Hay or Manure Use"
  - b. revise restriction to add "treated within the preceding 18-months; and from "mulch that will be applied..." to "mulch or mushroom spawn."
  - c. add restriction for manure from ariimals that have grazed within the previous 3 days
  - d. add restriction for crops in field treated with manure from animals that have grazed forage
- 6. High-Volume Foliar Application: removed "broadcast up to"
- 7. Table 3 Weeds Controlled: added the following broadleaf weeds: common cat's ear, hairy fleabane, giant hogweed, giant knotweeds, Japanese knotweeds, wild licorice, purple loosestrife, silverleaf nightshade, Swainson pea, povertyweed, sicklepod, annual sowthistle, Japanese stiltgrass, blessed milk thistle, Russian thistle, Tree of heaven, panicle willoweed; and corrected Milestone to Milestone WM in notes.
- 8. Add footnotes on invasive knotweeds and purple losestrife
- 9. Add section for Woody Plant Control including foliar applications, low volume foliar treatments in eastern and southern states, table for low volume tank mixes, low volume basal bark applications, low volume stem bark band treatment, guidelines and tables for basal applications, cut surface applications, and chemical side trimming.
- 10. Add section for Applications for Bareground
- 11. Add supplemental labeling for Milestone VM to end of label entitled: 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.

Note to artwork coordinator: changes to cover, base label and booklet and advisory graphic

Trademark of Dow AgroSciences LLC

L1B / Milestone VM / Amend / 07-28-11

(Base label):

## Milestone® VM

**Specialty Herbicide** 

ACCEPTED

AUG - 4 2011

Under the Pederal Insecticide, Fungicide, and Rodenticide Act, as amended, for the posticide registered under EPA Reg. No. 62719-537

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.

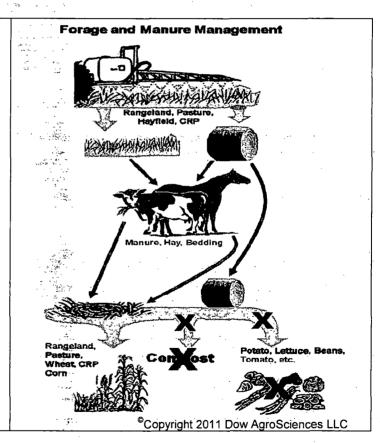
Hay from grass treated with Milestone VM in within the preceding 18-months can only be used on the farm or ranch where the product is applied unless allowed by supplemental labeling

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

- Carefully read the section "Restrictions in Hay or Manure
- It is mandatory to follow the "Use Precautions and Restrictions" section of this label.

Use."

- 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.



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

GROUP



HERBICIDE

Active Ingredient:

Triisopropanolammonium salt of 2-pyridine

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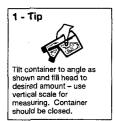
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carboxylic acid, 4-amino-3,6-dichloro	40.6%
Other Ingredients	59.4%
Total	.100.0%

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]







## Keep Out of Reach of Children **CAUTION**

#### **Precautionary Statements**

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.

This chemical has the 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.

#### Nonrefillable containers 5 gallons or less:

#### 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 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:

#### 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 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 a 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 larger than 5 gallons:

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#### 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 Est.

Trademark of Dow AgroSciences LLC

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

EPA Reg. No. 62719-537

Net Contents

(cover/shipping container):

## Milestone® VM

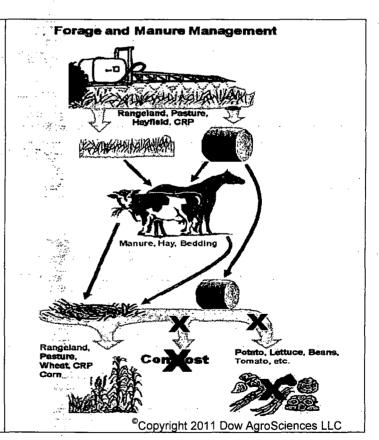
#### **Specialty Herbicide**

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.

Hay from grass treated with Milestone VM in 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.



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

GROUP HERBICIDE

#### L1B / Milestone VM / Amend / 07-28-11

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Active Ingredient:	
Triisopropanolammonium salt of 2-pyridine	
carboxylic acid, 4-amino-3,6-dichloro	.40.69
Other Ingredients	59.49

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 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.

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

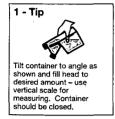
Net Contents

<sup>®</sup>Trademark of Dow AgroSciences LLC

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(Page 1 through end):

[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]







#### **Precautionary Statements**

#### **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 RPE 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.

This chemical has the 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.

#### **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.

**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.

#### Nonrefillable 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 a 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 larger than 5 gallons:

**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

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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.

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.

Hay from grass treated with Milestone VM in 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. 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**

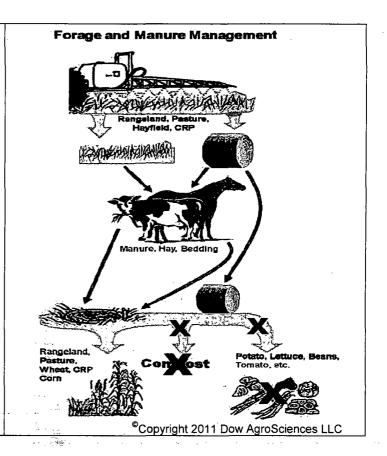
- Development of plant populations resistant to this herbicide mode of action is usually not a problem on non-cropland sites since these sites receive infrequent pesticide applications.
- Similar looking biotypes of a given weed species occurring in a treated area may vary in their susceptibility to 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**

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

- 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.



- Do not use grasses treated with Milestone VM in the preceding 18-months for hay intended for export outside the United States.
- Hay from areas treated with Milestone VM in the preceding 18-months CAN NOT be distributed or made available for sale off the farm or ranch where harvested unless allowed by supplemental labeling.
- Hay from areas treated with Milestone VM in the preceding 18-months CAN NOT be used for silage, haylage baylage and green chop unless allowed by supplemental labeling.
- Do not move hay made from grass treated with Milestone VM within the preceding 18-months off farm unless allowed by supplemental labeling.
- Do not use hay or straw from areas treated with Milestone VM within the preceding 18-months or manure from animals feeding on hay treated with Milestone VM in compost.
- Do not use grasses treated with Milestone VM in the preceding 18-months for seed production.

- . 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 retreatment, 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.
- Do not apply this product on 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.
- 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.
- 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 Milestone VM. Injury to crops may result if treated soil and/or
  runoff water containing Milestone VM is washed, or moved onto land used to produce crops.
  Exposure to Milestone VM 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.

#### Grass Revegetation:

- Application before seeding grasses
  - Milestone VM can be applied in the spring through fall to control broadleaf weeds prior to grass planting. Grasses can be seeded as a dormant planting (in the late fall or early winter) in the year of application or grasses can be seeded the following spring. The grasses should be planted when soil temperatures are low enough to ensure that the seeds will not germinate and emerge until the following spring.
  - O Grass seed germination and seedling development can be adversely effected by many factors such as seed viability and seedling vigor, soil condition (sub-optimal soil temperatures or soil water content), weather after planting, seedbed preparation and seed placement, disease, insects, or animals. Milestone VM applications will help to reduce competition from weeds and improve the chance for successful grass stand establishment. Some grass species are more sensitive to Milestone VM; consult DowAgroSciences' literature for more details.
- Postemergence application on grasses: 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

bromegrass (*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.
- **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 Uses:
  - 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 susceptible 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 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.

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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 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 fi 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

Use a syringe to measure cc

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

#### 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.

	,		
	lilestone VM per 1 ual Broadcast Rat		
Broadcast Rate (fl oz/acre)	Amount of Milestone VM per 100 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 Labled 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

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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 when 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 regrowth 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

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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		Life Cycle	Plant Family
amaranth, spiny	Amaranthus spinosus	4 to 7	annual	Amaranthaceae
bedstraw	Galium spp.	4 to 7	perennial	Rubiaceae
beggarticks	Bidens spp.	4 to 7	annual	Asteracea
broomweed, annual	Amphiachyris dracunculoides	4 to 7	annual	Asteraceae
burdock, common*, **	Arctium minus	4 to 7	biennial	Asteraceae
buttercup, hairy*	Ranunculus sardous	4 to 7	annuai	Ranunculaceae
buttercup, tali*, **	Ranunculus acris	4 to 7	perennial	Ranunculaceae
camelthorn	Alhagi pseudalhagi	5 to 7	perennial	Fabaceae
cat's ear, common	Hypochaeris radicata	5-7	perennial	Asteraceae
chamomile, scentless	Matricaria inodora	4 to 7	annual	Asteraceae
chicory*	Cichorium intybus	4 to 7	perennial	Asteraceae
chickweed	Stellaria media	7	annual	Caryophyllaceae
cinquefoil, sulfur (1)*, **	Potentilla recta	4 to 7	perennial	Rosaceae
cocklebur	Xanthium strumarium	3 to 5	annual	Asteraceae
clover	Trifolium spp.	5 to 7	perennial	Fabaceae
croton, tropic	Croton glandulosus	3 to 5	annual	Euphorbiaceae
crownvetch	Securigera varia	5 to 7	perennial	Fabaceae
cudweed, purple	Gamochaeta purpurea	4 to 7	annual	Asteraceae
daisy, oxeye (1)*, **	Leucanthemum vulgare	4 to 7	perennial	Asteraceae
dock, curly*	Rumex crispus	4 to 7	perennial	Polygonaceae
evening primrose, cutleaf	Oenothera laciniata	4 to 7	annual	Onagraceae
fleabane, hairy	Conyza bonariensis	5-7	annual/biennia I	Asteraceae
fiddleneck, common	Amsinckia intermedia	7	annual	Boraginaceae

fireweed	Epilobium angustifolium	5 to 7	perennial	Onagraceae
fleabane, flax-leaf	Conyza bonariensis	4 to 7	annual	Asteraceae
hawkweed, orange (2)*, **	Hieracium aurantiacum	4 to 7	perennial	Asteraceae
hawkweed, yellow (2)*, **	Hieracium caespitosum	4 to 7	perennial	Asteraceae
henbit*	Lamium amplexicaule	5 to 7	annual/	Lamiaceae
	·	•	biennial	<u></u>
	Heracleum			
hogweed, giant	mantegazzianum	7	perennial	Apiaceae
horsenettle, Carolina**	Solanum carolinense	4 to 7	perennial	Solanaceae
horseweed (marestail)	Conyza canadensis	4 to 7	annual	Asteraceae
ironweed, tall	Vernonia gigantea	5 to 7	perennial	Asteraceae
ironweed, western	Vernonia baldwinii	. 7	perennial	Asteraceae
knapweed, diffuse (3)*, **	Centaurea diffusa	⊶5 to 7	biennial/ perennial	Asteraceae
knapweed, Russian (4)*, **	Acroptilon repens	5 to 7	perennial	Asteraceae
knapweed, spotted (3)*, **	Centaurea stoebe	5 to 7	biennial/ perennial	Asteraceae
knapweeds	Centaurea spp.	5 to 7	biennial/ perennial	Asteraceae
knotweeds, Japanese,				
bohemian, giant (11)	Reynoutria japonica	7-14*	perennial	Polygonaceae
kudzu*, **	Pueraria montana	7	perennial	Fabaceae
lady's thumb*	Polygonum persicaria	3 to 5	annual	Polygonaceae
lambsquarters	Chenopodium album	⊸ 5 to 7	annual	Chenopodiaceae
lespedeza, annual	Lespedeza striata	5 to 7	annual	Fabaceae
licorice, wild		7	perennial	Fabaceae
locust, black	Robinia pseudoacacia	.7	woody perenniai	Fabaceae
locust, honey	Gleditsia triacanthos	7	woody perennial	Fabaceae
loosestrife, purple (12)	Lythrum salicaria	7-14*	perennial	Lythraceae
mayweed, scentless*	Tripleurospermum perforata	4 to 7	annual	Asteraceae
mayweed, stinking*, **	Anthemis cotula	. 7	annual	Asteraceae
medic, black*	Medicago lupulina	4 to 6	perennial	Fabaceae
mimosa	Albizia julibrissin	7	woody	Fabaceae
			perennial	
mullein (5)	Verbascum spp.	7	biennial	Scrophulariaceae
nightshade, silverleaf	Solanum elaeagnifolium	4-7	perennial	Solanaceae
oxtongue, bristly	Picris echioides	5 to 7	biennial	Asteraceae
pea, Swainson	Sphaerophysa salsula	5-7	perennial	Fabaceae
povertyweed	lva axillaris	5-7	perennial	Asteraceae
ragweed, common**	Ambrosia artemisiifolia	3 to 5	annual	Asteraceae
ragweed, western	Ambrosia psilostachya	4 to 7	perennial	Asteraceae
ragwort, tansy*, **	Senecio jacobaea	5 to 7	perennial	Asteraceae
redbud	Cercis Canadensis	7	woody perennial	Fabaceae
rose	Rosa spp.	7	Woody perennial	Rosaceae
rush skeletonweed	Chondrilla juncea	5 to 7	perennial	Asteraceae
		· · · · ·		
sicklepod	Cassia obtusifolia	171	perennial	Fabaceae

	pensylvanicum	<u> </u>		
sneezeweed, bitter	Helenium amarum	4 to 7	annual	Asteraceae
soda apple, tropical (6)*, **	Solanum viarum	5 to 7	perennial	Solanaceae
sowthistle, annual	Sonchus oleraceae	7	annual	Asteraceae
sowthistle, perennial*, **	Sonchus arvensis	3 to 5	perennial	Asteraceae
spanishneedles	Bidens bipinnata	4 to 7	annual	Asteraceae
star-thistle, Malta (7) *,**	Centaurea melitensis	3 to 5	annual	Asteraceae
starthirstle, purple (7) *.**	Centaurea calcitrapa	. 3 to 5	biennial	Asteraceae
star thistle, yellow (7)*, **	Centaurea solstitialis	3 to 5	annual	Asteraceae
St. Johnswort, common	Hypericum perforatum	5 to 7	perennial	Clusiaceae
stiltgrass, Japanese	Microstegium vimineum	5-7	annual	Poaceae
sunflower, common	Helianthus annuus	4 to 7	annual	Asteraceae
teasel	Dipsacus spp.	4 to 7	biennial	Dipsacaceae
thistle, artichoke	Cynara cardunculus 💮	5 to 7	perennial	Asteracea
thistle, blessed milk	Silybum marianum	4-7	biennial	Asteraceae
thistle, bull (8)*, **	Cirsium vulgare	3 to 5	biennial	Asteraceae
thistle, Canada (9)*, **	Cirsium arvense	<sup>3</sup> 5 to 7	perennial	Asteraceae
thistle, Italian	Carduus pycnocephalus	7	annual	Asteraceae
thistle, musk (8)*, **	Carduus nutans	3 to 5	biennial	Asteraceae
thistle, plumeless (8)*, **	Carduus acanthoides	3 to 5	biennial	Asteraceae
thistle, Scotch*, **	Onopordum acanthium	5 to 7	biennial	Asteracea
thistle, Russian		er er		
(preemergence)	Salsola tragus	7	annual	Chenopodiaceae
thistle, woolly distaff	Carthamus lanatus	4 to 7	annual	Asteraceae
Tree of heaven	Ailanthus altissima	7	perennial	Simaroubaceae
vetch	the state of the s	3 to 7	perennial	Fabaceae
willoweed, panicle	Epilobium brachycarpum	5-7	annual	Onagraceae
wisteria	Wisteria brachybotris	7	woody	Fabaceae
			perennial	
wormwood, absinth(10)*, **	Artemisia absinthium	6 to 7	perennial	Asteraceae
yarrow, common	Achillea millefolium	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).

- (1) **Sulfur cinquefoil or oxeye daisy:** Apply Milestone VM at 4 to 6 fl oz per acre to plants in the prebud stage of development.
- (2) Orange or yellow hawkweeds: Apply Milestone VM at 4 to 7 fl oz per acre to plants in the bolting stage of development.
- (3) **Diffuse and spotted knapweeds:** Apply Milestone VM 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 VM 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 VM 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 VM at 3 to 5 fl oz per acre to plants at the rosette through bolting growth stages.

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

- (8) **Bull, musk, and plumeless thistles:** Apply Milestone VM 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 VM 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
- (11) Invasive knotweeds: Japanese, Bohemian, giant knotweeds: Apply Milestone VM at 7 fl oz per acre broadcast using high volume per acre (100 gallons per acre) or apply as a spot treatment using 14 fl oz per acre. No more than 50% of an acre can be treated at the 14 oz/acre spot treatment rate. Optimum results for suppression of plant growth are obtained when applications are made to plants that are about 3 to 4 feet in height in early summer. Retreatment in subsequent years may be necessary to control resprouts.
- (12) Purple loosestrife: For optimum control apply Milestone VM at 7 fl oz per acre plus 1 pt to 1 qt of 2,4-D amine or 1 to 2 qts of Garlon 3A. Spot treatments may also be made by applying Milestone VM at 14 fl oz (see Spot treatment section of the label) with or without the addition of 2,4-D or Garlon 3A. No more than 50% of an acre can be treated at the 14 oz/acre spot treatment rate.

#### **Woody Plant Control**

Milestone VM may be applied alone or in tank-mix combinations with labeled rates of other herbicides provided: (1) the tank mix product is labeled for the timing and method of application for the use site to be treated and (2) mixing is not prohibited by the label of the registered tank mixed products. Use as directed in the Directions of Use section of the tank-mix partner. Follow Mixing Instructions under the Mixing Instructions section.

Add Milestone VM to brush control tank mixes for improved brush control on species such as alder, aspen, conifers (pine and cedar), coyotebrush, elm, maple, cherry, poplar, oak, broom (Scotch, Spanish, French, and Portuguese), boxelder, gorse, hackberry, Russian olive, saltcedar, and blackberry.

#### Foliar Applications:

For broad spectrum brush control using a foliar application, Milestone VM may be added to tank mixes with Accord XRT II, Rodeo, Arsenal Powerline, Garlon 4 Ultra Forestry Garlon XRT, or Garlon 3A, Tordon K, or other products labeled for use in industrial vegetation management programs.

#### Low Volume Foliar Treatments in eastern and southern states

To control susceptible woody plants, use tank mixes of Milestone VM with other herbicides (see table 4) in water and apply 10 to 100 gallons of finished spray. The spray concentration of Milestone VM tank mixes and total spray volume per acre should be adjusted according to the size and density of target woody plants and type of spray equipment used. With low volume application, use sufficient spray volume to obtain uniform coverage of target plants including the surfaces of all foliage, stems, and root collars.

For best results, a surfactant should be added to all spray mixtures. Match equipment and delivery rate of spray nozzles to height and density of woody plants. When treating tall, dense brush, a truck mounted spray gun with spray tips that deliver up to 2 gallons per minute at 40 to 60 psi may be required. Backpack or other types of specialized spray equipment with spray tips that deliver less than 1 gallon of spray per minute may be appropriate for short, low to moderate density brush.

TABLE 4. Low Volume Tank Mixes and Application Rates for Woody Plant Control including mixed hardwoods, elm, locust, pine, and cedar

D-46 001148 \/04		
Rate of Milestone® VM	Tank Mix	Special Note:

herbicide		
0.25 - 0.75% v/v	Rodeo <sup>®</sup> at 3-5% v/v + Arsenal Powerline at 0.25-0.75% v/v + surfactant	Not selective to grasses
0.25 - 0.75% v/v	Garlon® 3A at 2-5% v/v + surfactant or Garlon 4 Ultra at 2-4% v/v + surfactant	Selective to grasses

#### Low Volume Basal Bark Applications:

To control susceptible woody plants with stems less than 6 inches in basal diameter, apply herbicide mix (see below for rates) with a backpack or knapsack sprayer using low pressure and a solid cone or flat fan nozzle. Spray the basal parts of brush and tree trunks to a height of 12 to 15 inches from the ground in a manner that thoroughly wets the lower stems but not to the point of runoff. The use of a Spraying Systems Y2 nozzle or similar nozzle is recommended, which will narrow the spray pattern to target individual stems. Herbicide concentration should vary with tree diameter, bark thickness, volume used per acre, and susceptibility of species treated. Apply anytime, including the winter months, except when snow or water prevent spraying to the ground line or when stem surfaces are saturated with water.

Milestone VM Herbicide may be used as a low volume basal treatment alone, for sensitive woody species in the Fabaceae family (legumes), or in combination with Garlon 4 Ultra or Forestry Garlon XRT, for broader control of other sensitive woody species. Applications should not exceed the maximum use rate per acre.

Mix Milestone VM at 0.5 to 5% v/v alone (0.5 to 5 gallons of Milestone VM in enough oil to make 100 gallons of spray mixture), or with Garlon 4 Ultra or Forestry Garlon XRT in a commercially available basal diluent (or other oils or basal diluents as recommended by the manufacturer); the basal oil should be compatible with a water soluble herbicide such as Milestone VM. Make a stable tank mixture for basal bark application by first combining each product with a compatibility agent prior to final mixing in the desired ratio.Mix Milestone VM and Garlon 4 Ultra or Forestry Garlon XRT (if using a tank mix) thoroughly with basal oil; if the mixture stands for more than 30 minutes, reagitation may be required. Do not store the final mixture.

#### Low Volume Stem Bark Band Treatment for the North Central and Lake States

Use the rates and nozzles as described above and apply the spray in a 6- to 10-inch wide band that completely encircles the stem. Spray in a manner that completely wets the bark, but not to the point of runoff. The treatment band may be positioned at any height up to the first major branch. For best results apply the band as low as possible. Spray mixture concentration should vary with size and susceptibility of species to be treated. Applications may be made anytime, including winter months.

#### **Guidelines for Basal Applications**

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. See Table 5 below for mixing and application rates by volume (gallons per acre/GPA). See Table 6 for information about stem densities and use rates per acre.

Avoid treating high density of stems adjacent to desirable trees with roots in the treatment zone. 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.

Table 5:

% of Milestone VM in Basal Mix		Fluid ou	inces of Miles	tone VM by G	SPA (gallons	per acre)	
	1	2	3	4	5	6	. 7
1.0	1.3	2.6	3.8	5.1	6.4	7.7	9.0
1.5	1.9	3.8	5.8	7.7	9.6	11.5	13.4
2.0	2.6	5.1	7.7	10.2	12.8	A Same King La	TPACE NOT
2.5	3.2	6.4	9.6	12.8			
3.0	3.8	7.7	11.5	PART TOTAL		34.36.77.86	
3.5	4.5	9.0	13.4	15.55 2.75 2.75 2.2		F-1700 (4)	
4.0	5.1	10.2	3.29°.7°%	TO A SUFFI		744° 574	
5.0	6.4	12.8	#134×17##				

within spot treatment labeled rate
in excess of spot treatmentt labeled rate

Table 6:

Gallons per acre for basal bark applications on various densities of stems per acre					
	Volume/A	cre Range	Target		
Number of Stems/Acre	Gal/Acre	Gal/Acre	Spacing		
250	1.0	1.7	8.4		
500	2.0	3.3	5.9		
750	3.0	5.0	4.9		
1000	4.0	6.6	4.2		
1250	5.0	7.0	3.8		
1500	5.9	7.0	3.4		

### Cut Surface Applications Including Cut Stump, Tree Injection, Hack & Squirt and Frill & Girdle:

Apply Milestone VM alone in the cut surface applications listed below for control of susceptible tree species such as legumes like Albezia, mimosa, and locust. Mixtures of Milestone VM and Garlon 3A or Garlon 4 Ultra are effective on species other than legumes such as elm, maple, cherry, sweet gum, poplar, oak and conifers.

#### **Cut Surface:**

Apply Milestone VM in the cut surface applications listed below for control of susceptible tree species such as legumes like Albezia, mimosa, locust, etc. Mixtures of Milestone VM and Garlon 3A or Garlon 4 may be effective on species other than legumes such as elm, maple, oak and conifers..

Cut surface applications may be used successfully at any season except during periods of heavy sap flow of certain species - for example, maples.

#### **Cut-Stump Treatment**

Apply Milestone VM as a 10% dilution v/v in water, by spraying or painting the cut surfaces of freshly cut stumps and stubs as soon as possible after cutting with undiluted Milestone VM. The cambium area next to the bark is the most vital area to wet.



#### With Tree Injector Method

Apply by injecting 1 milliliter of 10% v/v in water Milestone VM through the bark at intervals of 3 to 4 inches between centers of the injector wound. The injections should completely surround the tree at any convenient height. Note: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is injected directly into plants.

#### With Hack and Squirt Method

Make cuts around the tree trunk at a convenient height with a hatchet or similar equipment so that the cuts overlap slightly and make a continuous circle around the trunk. Spray 1 milliliter of 10% v/v in water Milestone VM into the pocket created between the bark and the inner stem/trunk by each cut.

#### With Frill or Girdle Method

Make a single girdle through the bark completely around the tree at a convenient height. The frill should allow for the herbicide to remain next to the inner stem and absorb into the plant. Wet the cut surface with 10% v/v in water Milestone VM.

#### **Chemical Side Trimming**

Milestone VM may be tank mixed with, Garlon 3A, Rodeo, Krenite or other labelled herbicides for effective chemical limb trimming applications. These applications are designed to control only the portion of the plant which is treated. Mix Milestone VM at 0.1 – 0.4%v/v plus recommended rate of the tank mix partner(s) plus surfactant or mix Milestone VM at 7 fl oz/A with the other tank mix partner(s). Use lower rates where GPA is higher not to exceed Milestone VM maximum label rate. Direct the spray solution to thoroughly cover only the portion of the plant to be controlled. Avoid spraying the crown of the tree to provide for side trimming and not complete control of the tree.

#### Applications for Bareground

For preemergent applications apply Milestone VM at 7 fl oz per acre. When applied at lower rates, Milestone VM can provide short-term control of some susceptible weeds but when applied at higher rates, weed control is extended.

Milestone VM provides preemergent and post emergent control of susceptible weeds. See the Milestone VM label for directions on use for post emergent applications. Preemergent applications of Milestone VM can prevent germination and establishment of weeds, reducing weed biomass in treated areas. Apply Milestone VM as a preemergence spray before or during the rainy season when weeds are actively germinating. Control with preemergent applications will depend upon application rate, species susceptibility, application timing, and environmental conditions, such as precipitation, following application.

Best results for total vegetation control are obtained if Milestone VM at 7 fl oz per acre is tank mixed with other herbicides to broaden the weed spectrum by controlling grasses. If grasses and tolerant broadleaf weeds are present at application or will germinate on the site then tank mixtures with other herbicides such as Accord XRT II, Rodeo, Dimension 2EW (annual grasses), Oust XP, Payload, diuron, or other herbicides for bareground applications, are recommended.

#### **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:** The distance of the outer most operating nozzles on the boom must not exceed 75% of wingspan or 85% of rotor diameter.



**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.

#### 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.

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#### **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.

<sup>®</sup>Trademark of Dow AgroSciences LLC EPA accepted \_\_/\_\_/\_

# Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

### Milestone® VM

EPA Reg. No. 62719-537

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

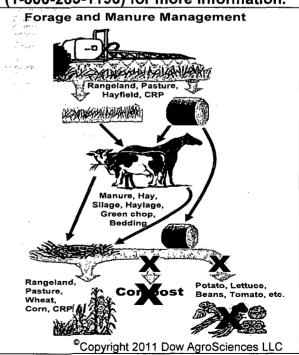
- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for Milestone VM herbicide before applying. Carefully follow all precautionary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

#### **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 amnopyralid to cause injury to sensitive brodleaf 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



- Do not use grasses treated with Milestone VM in the preceding 18-months for hay intended for export outside the United States.
- Do not use hay or straw from areas treated with Milestone VM within the preceding 18-months, or manure from animals feeding on hay treated with Milestone, in compost.
- Do not use grasses treated within the preceeding 18-months for seed production.
- Grazing and Haying Restrictions: There are no restrictions on grazing or grass 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 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.
- Transfer of Animals Feeding on Milestone VM-Treated Forage: Do not transfer animals grazing
  or feeding on hay from areas treated with Milestone VM 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.

#### 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 residues 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.
- **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.

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- 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.
- Milestone VM 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 Milestone VM
  through movement into the soil. 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.

Expiration Date: August 10, 2014

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R880-037

Accepted: \_\_/\_/\_
Replaces: Initial