

62719-568

11/27/2013

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

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Niamh McMahon  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

NOV 27 2013

**Subject:** Updating label with State Specific language.  
**Product name:** SIMPLICITY  
**EPA Reg. No:** 62719-568  
**Application Dated:** April 19, 2013

Dear Ms. McMahon,

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 the 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 released for shipping after eighteen (18) months 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.

If you have any questions, please contact Grant Rowland at 703-347-0254 or at [Rowland.Grant@epa.gov](mailto:Rowland.Grant@epa.gov).

Sincerely,

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

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

# Simplicity™

EPA Reg. No. 62719-568

## Registration Notes:

Source label text based on EPA accepted text dated September 28, 2010.

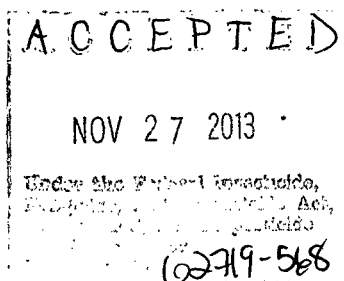
### Proposed changes by amendment:

1. Updated trademark information
2. First Aid: Corrected spelling of "center" under "If Swallowed" statement
3. Storage and Disposal: (1) Revised 3<sup>rd</sup> sentence in first paragraph to read, "Do not store below 16°F/-9°C."; (2) revised "Pesticide Storage" statement to read, "Store in original container only. Do not store below 16°F. Allow product to warm above...mix the product prior to use."
4. Crop Rotation Intervals: (1) Deleted crop rotation table; (2) added crop rotation interval table for all states except Arizona, California, Idaho, Oregon, and Washington; (3) added a crop rotation interval table for Arizona and California; (3) added a crop rotation interval table for Idaho, Oregon, and Washington.
5. California Application Requirements for Protection of Sensitive Crops: Added section to include "Ground Application," Aerial Application," and "Buffer Zones"
6. Mixing Directions: Added 6<sup>th</sup> bullet to "Tank Mixing Precautions" to read, "Incompatible mixtures may lead to difficult to clean herbicide residues in the spray tank which if not properly cleaned could cause damage to sensitive crops."
7. Clean-Out Procedures for Spray Equipment: Revised section
8. Weeds Controlled (C) or Suppressed (S): (1) Added the following statement to the paragraph, "Simplicity will not control known ALS (Group 2) resistant biotypes of labeled weeds."; (2) Added "fiddleneck, coast", "goosefoot, nettleleaf", "nettle, burning", "dogfennel", and "radish, wild" to listing of broadleaf weeds controlled
9. Resistance Management: Added the following statement to 1<sup>st</sup> paragraph, "Simplicity will not control known ALS (Group 2) resistant biotypes of labeled weeds."
10. Application Directions: Changed the following text to magenta text under the "Application in Fluid Fertilizer" instructions, "instead of crop oil concentrate or methylated seed oil." This text will be excluded from the commercial label.
11. Wheat (Including Durum) and Triticale: Added "a total of" to 2<sup>nd</sup> bullet under "Crop Specific Use Restrictions."

### Additional changes by amendment per request of Grant Rowland (EPA) via email to Niamh McMahon (DAS) dated September 4, 2013:

1. Use Precautions and Restrictions: Revised section to separate "Precautions" from "Restrictions" into distinct sections with their own headers.

®™ Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow



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(Page 1 through end)

### IMPORTANT NOTICE

U.S. LABEL - It is a violation of United States law to use this product in the United States in a manner inconsistent with its United States labeling.

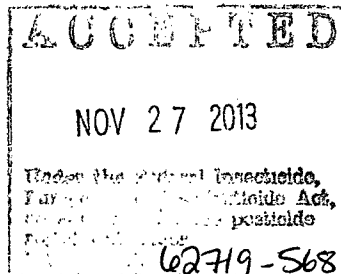
### Simplicity™ HERBICIDE

GROUP **2** HERBICIDE

ACTIVE INGREDIENTS/GUARANTEE:

PYROXSULAM.....	2.87%
Other Ingredients.....	97.13%
Total.....	100.00%

Warning, contains the allergen soy.  
 Contains petroleum distillates.  
 Equivalent to 0.25 lb per gallon or 30 g per liter of pyroxsulam.



KEEP OUT OF REACH OF CHILDREN

**WARNING/AVISO** (insert a skull & crossbones in an inverted triangle here) **POISON**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 62719-568  
EPA Est. \_\_\_\_\_

NET CONTENTS \_\_\_\_\_

**FIRST AID**  
**When seeking medical attention, take the container label if at all possible. If not, take information which identifies the product, that is, the product name and registration numbers.**  
**If swallowed:** Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control centre or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.  
**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.  
**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.  
**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 eye. Call a poison control center or doctor for treatment advice.  
**In the U.S. -** In case of emergency endangering health or the environment involving this product call 1-800-992-5994.

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116**TOXICOLOGICAL INFORMATION**

No specific antidote. Employ supportive care. Treatment should be based on judgment of the physician in response to reactions of the patient. This product contains petroleum distillates. Vomiting may cause aspiration pneumonia.

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**Precautionary Statements**

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**Hazards to Humans and Domestic Animals**

**WARNING/AVISO** (insert a skull & crossbones in an inverted triangle here) **POISON**

**POTENTIAL DERMAL SENSITIZER****EYE AND SKIN IRRITANT**

Harmful if inhaled • Harmful if Swallowed • Causes eye and skin irritation • Do not get in eyes or on skin • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals

**Personal Protective Equipment (PPE)**

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

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves
- Shoes plus socks
- Protective eyewear

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

**Engineering Controls**

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

**User Safety Recommendations**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**Environmental Hazards**

TOXIC to aquatic organisms and non-target terrestrial plants. Do not apply directly to water, or 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 disposing of wastes. Overspray or drift to sensitive habitats should be avoided. Do not apply during periods of dead calm or when winds are gusty. This product contains petroleum distillate.

This product may contaminate surface water due to runoff of rainwater. This is especially true for poorly draining soils and soils with shallow ground water.

This product is classified as having high potential for runoff for several days after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential for contamination of water from runoff of rainwater. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

### Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

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

### Agricultural Use Requirements

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

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours.

For early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear:

- Coveralls
- Chemical-resistant gloves (made of any waterproof material)
- Shoes plus socks
- Protective eyewear

### Storage and Disposal

Store in original container in a secure, dry, heated storage. This product will freeze at 14°F/-10°C. Do not store below 16°F/-9°C. Allow product to warm above 45°F/7°C before using and thoroughly mix the product prior to use. Do not contaminate food, feedstuffs or domestic water supplies.

**Pesticide Storage:** Store in original container only. Do not store below 16°F. Allow product to warm above 45°F before using and thoroughly mix the product 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.

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

**Refillable containers 5 gallons or larger:**

**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 and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

**Nonrefillable containers 5 gallons or larger:**

**Container Handling:** Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then 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.

**Product Information**

Use Simplicity™ herbicide as a postemergence herbicide for the control of annual grass and broadleaf weeds in wheat (including durum) and triticale.

Simplicity rapidly stops growth of susceptible weeds. However, typical symptoms (discoloration) of controlled or suppressed weeds may not be noticeable for 1 to 2 weeks after application, depending upon growing conditions and weed susceptibility. Degree of control and duration of effect are dependent upon weed sensitivity, weed size, crop competition, growing conditions at and following treatment, and spray coverage.

**Product Precautions**

When applying this product in tank mix combination, follow all applicable use directions, precautions, and limitations on each manufacturer's label.

**Product Restrictions**

**Chemigation:** Do not apply this product through any type of irrigation system.

Do not apply Simplicity directly to, or otherwise permit it to come into direct contact with, susceptible crops or desirable plants including alfalfa, barley, canola, beans, cotton, flowers, grapes, lettuce, lentils, mustard, oats, peas, potatoes, radishes, soybeans, sugar beets, sunflowers, tobacco, tomatoes, vegetables, or other desirable broadleaf crops or ornamental plants. Do not permit spray mists containing Simplicity to drift onto such plants.

Do not apply to crops underseeded with legumes.

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## Crop Rotation Intervals

The following rotational crops may be planted at the indicated interval following application of Simplicity.

**Crop Rotation Intervals for All States Except Arizona, California, Idaho, Oregon, and Washington**  
Superscripted numbers refer to Crop Specific Rotation Information.

Crop	Rotation Interval (Months) <sup>1</sup>
wheat, triticale	1
soybean <sup>2</sup>	5
barley, field corn, grasses, millet, oats, popcorn, seed corn, sweet corn, grain sorghum <sup>4</sup> , sunflower <sup>4</sup>	9
alfalfa, camelina, canola, chickpea, cotton <sup>3</sup> , dry bean, pea (dry and succulent), flax, lentil, mustard, peanuts, potato, safflower, sugar beet, sunflower	
other crops not listed	12

### Crop Specific Rotation Information:

<sup>1</sup>Minimum number of months that must elapse before planting other crops after application of Simplicity

<sup>2</sup>As a rotation crop, soybeans may be planted 3 months following an application of Simplicity in February or later in the following states: Alabama, Arkansas, Delaware, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Missouri, Mississippi, North Carolina, Nebraska, New Jersey, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas and Virginia. However, to ensure adequate crop safety, avoid planting soybeans prior to April 30 following an application of Simplicity made before February. All other states not listed require a minimum rotation interval of 5 months after an application of Simplicity.

<sup>3</sup>As a rotation crop, cotton may be planted 3 months following an application of Simplicity in February or later in the following states: Alabama, Arkansas, Georgia, Kansas, Kentucky, Louisiana, Missouri, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia. However, to ensure adequate crop safety, avoid planting cotton prior to April 30 following an application of Simplicity made before February. All other states not listed require a minimum rotation interval of 9 months after an application of Simplicity.

<sup>4</sup>As a rotation crop, grain sorghum and sunflowers may be planted 3 months following an application of Simplicity in February or later in the following states: Alabama, Arkansas, Colorado, Delaware, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Missouri, Mississippi, North Carolina, Nebraska, New Jersey, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, and Virginia. However, to ensure adequate crop safety, avoid planting sunflowers and grain sorghum prior to April 30 following an application of Simplicity made before February. All other states not listed require a minimum rotation interval of 9 months after an application of Simplicity.

### Crop Rotation Intervals for Arizona and California

Superscripted numbers refer to Crop Specific Rotation Information.

Crop	Rotation Interval (Months) <sup>1</sup>
triticale, wheat	1
corn (field, silage), cotton, dry beans, melons, sorghum (grain, silage), sudangrass	3
alfalfa, broccoli, cabbage,	5

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cauliflower, lettuce, onion	
barley, grasses, millet, oats, popcorn, seed corn, sweet corn, camelina, canola, chickpea, flax, lentil, mustard, pea (dry and succulent), potato, safflower, soybean, sugar beet, sunflower, tomato	9
other crops not listed	12

<sup>1</sup>Minimum number of months that must elapse before planting other crops after application of Simplicity.

### Crop Rotation Intervals for Idaho, Oregon, and Washington

Superscripted numbers refer to Crop Specific Rotation Information.

Crop	Rotation Interval (Months) <sup>1</sup>	
	Soil pH >6 and Rainfall <sup>2</sup> >16 Inches	Soil pH <6 or Rainfall <sup>2</sup> <16 Inches
wheat, triticale	1	1
barley, field corn, grasses, millet, oats, popcorn, seed corn, sweet corn, grain sorghum	10	10
alfalfa, camelina, canola, cotton, dry bean, flax, mustard, peanuts, safflower, soybean, sugar beet, sunflower		
pulse crops <sup>3</sup> including chickpea, lentil, and pea (dry and succulent), potato <sup>3</sup>		18
other crops not listed	12	

### Crop Specific Rotation Information:

<sup>1</sup>Minimum number of months that must elapse before planting other crops after application of Simplicity.

<sup>2</sup>Including irrigation.

<sup>3</sup>Pulse crops, including chickpea, lentil, and pea (dry and succulent), and potatoes may be planted 10 months after application if the soil pH is uniformly 6 or greater AND total rainfall (including irrigation) during the interval is greater than 16 inches. If the soil pH is less than 6 OR total rainfall (including irrigation) is less than 16 inches, then the rotation interval is 18 months.

**Note:** Simplicity is degraded primarily by microbial activity and breaks down more rapidly under favorable soil moisture and temperature conditions. Correspondingly, the rate of degradation may be slower under extreme conditions of drought or cold temperatures. When soil moisture conditions are abnormally dry during the interval between an application of Simplicity and planting the next crop, conduct a field bio-assay by planting test strips of the desired rotational crop. Monitor the test strips during germination and emergence for any abnormal growth to determine if the rotational crop can be grown successfully.

### Avoiding Injurious Spray Drift

This product can affect broadleaf plants directly through foliage and indirectly by root uptake from treated soil. Do not apply Simplicity directly to, or allow spray drift to come into contact with, broadleaf crops including alfalfa, barley, canola, beans, cotton, flowers, grapes, lettuce, lentils, mustard, oats, peas, potatoes, radishes, soybeans, sugar beets, sunflowers, tobacco, tomatoes, vegetables, or other desirable broadleaf crops or ornamental plants or soil where sensitive crops will be planted the same season. (See Crop Rotation Intervals section.)

Make applications only when there is little or no hazard from spray drift. Very small quantities of spray, which may not be visible, may seriously injure crops, whether dormant or actively growing. When applying Simplicity, use low pressure equipment capable of producing sprays of uniform droplet size with a minimum of fine spray droplets. Under adverse weather conditions, fine spray droplets that do not



settle rapidly onto target vegetation may be carried a considerable distance from the treatment area. A drift control or spray thickening agent may be used with this product to improve spray deposition and minimize the potential for spray drift. If used, follow all use directions and precautions on the product label.

**Ground Applications:** To minimize spray drift, apply Simplicity in a total spray volume of 10 gallons or more per acre using spray equipment designed to produce large droplet, low pressure sprays. Refer to the spray equipment manufacturer's directions for detailed information on nozzle types, arrangement, spacing and operating height and pressure. Apply spot treatments only with a calibrated boom to prevent over application. Operate equipment at spray pressures no greater than is necessary to produce a uniform spray pattern. Operate the spray boom no higher than is necessary to produce a uniformly overlapping pattern between spray nozzles. Do not apply with hollow cone-type nozzles or other nozzles that produce a fine-droplet spray.

**Aerial Application:** To minimize spray drift, apply Simplicity in a total spray volume of 5 gallons or more per acre. 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. Avoid applications below 2 mph due to variable wind direction and high potential for temperature inversion. Spray drift from aerial application can be minimized by applying a coarse spray at spray boom pressure no greater than 30 psi; by using straight-stream nozzles directed straight back; and by using a spray boom no longer than 3/4 the rotor or wing span of the aircraft. Spray pattern and droplet size distribution can be evaluated by applying sprays containing a water-soluble dye marker or appropriate drift control agents over a paper tape (adding machine tape). Mechanical flagging devices may also be used.

Do not apply under conditions of a low level air temperature inversion. A temperature inversion is characterized by little or no wind and lower air temperature near the ground than at higher levels. The behavior of smoke generated by an aircraft-mounted device or continuous smoke column released at or near site of application will indicate the direction and velocity of air movement. A temperature inversion is indicated by layering of smoke at some level above the ground and little or no lateral movement.

#### **Spray Drift Management**

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determine the potential for spray drift. The applicator and the grower 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:

- The distance of the outer most operating nozzles on the boom must not exceed 75% of wingspan or 90% of rotor diameter.
- Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

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

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).

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- **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 provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the air stream produces 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 the wingspan or 90% of rotor length may further reduce drift without reducing swath width.

**Application Height:** Do not make applications 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. Avoid making applications 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:** Do not apply 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.

**Sensitive Areas:** Apply the pesticide only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

**California Application Requirements for Protection of Sensitive Crops**

In addition to precautions in the **Aerial Drift Reduction Advisory** section, the following drift management requirements must be followed to minimize the potential for exposure of sensitive crops in California.

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Determine the prevailing wind speed and direction before application. Choose nozzles that will give a coarse droplet size spectrum (volume median diameter (VMD) of 350-400 microns) and minimize droplets that are less than 200 microns.

### Ground Application

Avoid spraying if sustained wind speeds exceed 10 mph. Avoid applying in gusty wind conditions. Setting the boom at the lowest height which provides uniform coverage reduces the exposure of droplets to evaporation and wind. Application more than 2 feet above the crop canopy increases the potential for spray drift. Medium to coarse droplet size reduces off-target drift. See table below for buffer zones to sensitive crops.

### Aerial Application

Solid stream nozzles oriented straight back produce the largest droplet size spectrum and the lowest drift. Boom length should be 75% or less of wing span. For helicopters, use a boom length or position that prevents droplets from entering the rotor vortices. Apply using a spray volume of 5 GPA or greater. Avoid spraying if sustained wind speeds exceed 10 mph. Avoid applying in gusty wind conditions. Application more than 10 feet above the canopy increases the potential for spray drift. Applications must be made at the lowest application height that provides uniform coverage and should be consistent with the safe operation of the aircraft. Coarse droplet size reduces off-target drift. See table below for buffer zones to sensitive crops.

### Buffer Zones

The following buffer zones between the treated area and sensitive crops are required when these sensitive crops are downwind of the application site.

Sensitive Crop	Downwind buffer zone, feet	
	Ground	Air
carrot	120	500
onions	10	100
oat and ryegrass	50	250
All other broadleaf annual crops	20	160
tree and vine crops	20	160
dormant tree and vine crops	No buffer zone is required	

### Mixing Directions

#### Simplicity - Alone

1. Fill the tank with 1/2 of the total amount of water.
2. Start agitation.
3. Add the required amount of Simplicity.
4. Add the required amount of adjuvant (refer to Adjuvants section).
5. Continue agitation while filling the spray tank to the required volume.
6. To ensure a uniform spray mixture, continuous agitation is required during application. If product is allowed to settle, thoroughly agitate to resuspend the mixture before spraying. Apply mixture immediately after it is prepared.

#### Simplicity - Tank Mix

If a broader spectrum of weed control is needed, Simplicity may be tank mixed 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) tank mixing is not prohibited by the label of the tank mix product.

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1/6**Tank Mixing Precautions:**

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not mix with products containing dicamba or amine formulations of 2,4-D or MCPA as these products may reduce grass control provided by Simplicity.
- Do not tank mix with organophosphate insecticides as these mixtures may result in unacceptable crop injury.
- Do not exceed specified application rates for respective products or maximum allowable application rates for any active ingredient in the tank mix.
- Always perform a (jar) test to ensure the compatibility of products to be used in tank mixture.
- Incompatible mixtures may lead to difficult to clean herbicide residues in the spray tank which if not properly cleaned could cause damage to sensitive crops.

**Tank Mix Compatibility Testing:** Perform a jar test prior to tank mixing to ensure compatibility of Simplicity and other pesticides. Use a clear glass quart jar with lid and mix the tank mix ingredients in their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately 1/2 hour. If the mixture balls-up, forms flakes, sludges, jels, oily films or layers, or other precipitates, it is not compatible and the tank mix combination should not be used.

Vigorous, continuous agitation during mixing, filling and throughout application is required for all tank mixes. Sparger pipe agitators generally provide the most effective agitation in spray tanks. To prevent foaming in the spray tank, avoid stirring or splashing air into the spray mixture.

**Mixing Order for Tank Mixes:**

1. Fill the spray tank to 3/4 of the total spray volume required with water.
2. Start agitation.
3. Add Simplicity and agitate for 2 to 3 minutes
4. After adding Simplicity, add different formulation types in the following order: (1) dry flowables; (2) wettable powders; (3) aqueous suspensions, flowables and liquids. Maintain agitation and add: (4) emulsifiable concentrates; (5) solutions; and (6) adjuvants. Allow time for complete mixing and dispersion after each addition.
5. Finish filling the spray tank. Maintain continuous agitation during mixing and throughout application. If product is allowed to settle, thoroughly agitate to resuspend the mixture before spraying. Apply mixture immediately after it is prepared.

If application or agitation must be stopped before the spray tank is empty, the materials may settle to the bottom. Settled materials must be resuspended before spraying is resumed. A sparger agitator is particularly useful for this purpose. Settled material may be more difficult to resuspend than when originally mixed.

**Clean-Out Procedures for Spray Equipment**

1. Drain any remaining spray mixture from the application equipment, then wash out tank, boom, and hoses with clean water. Drain again.
2. Hose down the interior surfaces of the tank while filling the tank 1/2 full of water.
3. Add commercial tank cleaner, such as household ammonia, at a rate of 1 gallon per 100 gallons of water. Recirculate for 10 – 20 minutes and spray out the mixture through the boom.
4. Remove all spray nozzles and screens and clean separately.
5. If spray equipment will be used for pesticide application to crops sensitive to Simplicity, repeat steps 1 through 3. Additional steps may be required to remove all traces of Simplicity including replacing hoses or other fittings that may contain adsorbed actives.
6. Thoroughly clean exterior surfaces of spray equipment.

Note: Rinsate may be disposed of on site according to label use directions or at an approved waste disposal facility. Reduced results may occur if water containing soil is used, such as visibly muddy water or water from ponds and ditches that is not clear.

**Weeds Controlled (C) or Suppressed (S)**

Best results are obtained when grass weeds are treated at the 2-leaf to 2-tiller stage of growth and before broadleaf weeds are larger than 2 inches tall or 2 inches in diameter. Best control is achieved when applications are made to actively growing weeds. Control may be reduced when weeds are exposed to drought or extreme temperatures. Simplicity will not control known ALS (Group 2) resistant biotypes of labeled weeds.

Common name	Scientific Name	Control/Suppression
<b>Grass Weeds</b>		
barley, foxtail	<i>Hordeum jubatum</i>	S
blackgrass	<i>Alopecurus myosuroides</i>	C
brome, downy	<i>Bromus tectorum</i>	S
brome, Japanese	<i>Bromus japonicus</i>	C
brome, ripgut	<i>Bromus diandrus</i>	C
canarygrass, hood	<i>Phalaris paradoxa</i>	S
canarygrass, littleseed	<i>Phalaris minor</i>	S
cheat	<i>Bromus secalinus</i>	C
chess, hairy	<i>Bromus commutatus</i>	C
fescue, rattail	<i>Vulpia myuros</i>	S
foxtail, green	<i>Setaria viridis</i>	S
foxtail, yellow	<i>Setaria pumila</i>	C <sup>4</sup>
oat, wild	<i>Avena fatua</i>	C
quackgrass	<i>Elymus repens</i>	S
rescuegrass	<i>Bromus catharticus</i>	S
ryegrass, Italian	<i>Lolium perenne</i>	C
windgrass	<i>Apera spica-venti</i>	C
<b>Broadleaf Weeds</b>		
bedstraw, catchweed (cleavers)	<i>Galium aparine</i>	C
buckwheat, wild	<i>Polygonum convolvulus</i>	S
canola, volunteer (wild turnip) <sup>2</sup>	<i>Brassica rapa</i>	C
chickweed, common	<i>Stellaria media</i>	C
chickweed, mouseear	<i>Cerastium fontanum</i>	C
dogfennel	<i>Eupatorium capillifolium</i>	C
falseflax, smallseed <sup>1</sup>	<i>Camelina microcarpa</i>	C
fiddleneck, coast	<i>Amsinckia menziesii</i> var. intermedia	C
flixweed <sup>2</sup>	<i>Descurainia sophia</i>	C
goosefoot, nettleleaf	<i>Chenopodium murale</i>	C
gromwell, corn	<i>Buglossoides arvensis</i>	C
hempnettle, common	<i>Galeopsis tetrahit</i>	C
henbit	<i>Lamium amplexicaule</i>	S
ladysthumb	<i>Polygonum persicaria</i>	C
lambsquarters, common	<i>Chenopodium album</i>	C <sup>3</sup>
mustard, black	<i>Brassica nigra</i>	C
mustard, blue <sup>1</sup>	<i>Chorispora tenella</i>	C
mustard, tumble <sup>1</sup>	<i>Sisymbrium altissimum</i>	C
mustard, wild	<i>Sinapis arvensis</i>	C
mustard, wormseed <sup>1</sup>	<i>Erysimum cheiranthoides</i>	C
nettle, burning	<i>Urtica urens</i>	C
radish, wild	<i>Raphanus raphanistrum</i>	C
pennycress, field <sup>1</sup>	<i>Thlaspi arvense</i>	C

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pigweed, redroot	<i>Amaranthus retroflexus</i>	C
shepherd's-purse <sup>1</sup>	<i>Capsella bursa-pastoris</i>	C
tansymustard, pinnate <sup>1</sup>	<i>Descurainia pinnata</i>	C
thistle, Russian	<i>Salsola tragus</i>	C <sup>3</sup>
wallflower, bushy <sup>1</sup>	<i>Erysimum repandum</i>	C

<sup>1</sup>Control may be reduced when application is made after bolting

<sup>2</sup>Including herbicide-tolerant canola varieties except Clearfield (imidazolinone-tolerant) canola.

<sup>3</sup>Less than 2 inches tall. For control of lambsquarters over 2 inches tall, tank mix with 0.25 lb ae MCPA or 2,4-D. For control of Russian thistle over 2 inches tall, tank mix with 0.25 lb ae 2,4-D.

<sup>4</sup>One to four-leaf stage of growth

## Resistance Management

Simplicity is an ALS mode of action (Group 2) herbicide. Any weed population may contain or develop plants naturally resistant to this product and other ALS herbicides. Simplicity will not control known ALS (Group 2) resistant biotypes of labeled weeds. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field. Other resistance mechanisms that are not linked to site of action, but specific for individual chemicals, such as enhanced metabolism, may also exist. Appropriate resistance management strategies should be followed.

To delay herbicide resistance:

- Where possible, rotate the use of Simplicity or other ALS herbicides with different herbicide groups that control the same weeds in a field.
- For best resistance management stewardship, do not use more than once per season.
- Use tank mixtures with herbicides from a different group when such use is permitted.
- Herbicide use should be based upon an IPM program that includes scouting, historical information related to herbicide use and crop rotation, and considers tillage (or other mechanical), cultural, biological and other chemical control practices.
- Monitor treated weed populations for resistance development.
- Prevent movement of resistant weed seeds to other fields by cleaning harvesting and tillage equipment and planting clean seed.
- Contact your local extension specialist or certified crop advisers for any additional pesticide resistance management and/or integrated weed management requirements for specific crops and weed biotypes.

## Application Directions

### Application Timing

Apply Simplicity postemergence to the main flush of actively growing weeds according to the target weed stage shown in the above table. Extreme growing conditions such as drought, temperatures near or below freezing prior to, at, or following time of application may reduce weed control and increase the risk of crop injury at all stages of growth.

Warm, moist growing conditions promote active weed growth and enhance the activity of Simplicity by allowing maximum foliar uptake and contact activity. Weeds hardened off by cold weather or drought stress may not be adequately controlled or suppressed and re-growth may occur. For best results, ensure thorough spray coverage of target weeds.

If foliage is wet at the time of application, control may be decreased. Applications of Simplicity are rainfast within 4 hours after application.

### Spray Coverage

Use sufficient spray volume to provide thorough coverage and a uniform spray pattern. Do not broadcast apply in less than 5 gallons of total spray volume per acre. For best results and to minimize spray drift, apply in a spray volume of 10 gallons or more per acre. As vegetative canopy and weed density, increase spray volume to obtain equivalent weed control. Use only nozzle types and spray equipment

designed for herbicide application. To reduce spray drift, follow precautions under Avoiding Injurious Spray Drift.

#### Adjuvants

When Simplicity is applied alone, use one of the following surfactants or adjuvants:

- Non-ionic surfactant with at least 80% active ingredient at 0.25% to 0.50% v/v (1 to 2 quarts per 100 gallons spray solution). In conditions of moisture stress or low relative humidity, add spray grade ammonium sulfate at 1.5 lb per acre.
- Crop oil concentrate adjuvant at 0.8% v/v (0.8 gallons per 100 gallons of spray solution)
- Methylated seed oil adjuvant at 0.8% v/v (0.8 gallons per 100 gallons of spray solution).

When Simplicity is applied in spray solutions containing liquid fertilizer, use a non-ionic surfactant with at least 80% active ingredient at a maximum of 0.25% v/v (1 quart per 100 gallons of spray solution).

**When Simplicity is applied in combination with emulsifiable concentrate (EC) formulations, such as 2,4-D ester, MCPA ester, Starane or bromoxynil+MCPA products, do not use an adjuvant.**

Do not use additives that lower the spray solution below a pH of 6.0.

When an adjuvant is to be used with this product, Dow AgroSciences recommends the use of a Chemical Producers and Distributors Association certified adjuvant.

#### Application in Fluid Fertilizer

Simplicity may be applied in spray solutions containing liquid nitrogen. The spray solution should not be composed of more than 50% liquid nitrogen and should not exceed 30 lb of actual nitrogen per acre.

When Simplicity is applied in spray solutions containing liquid nitrogen, use a non-ionic surfactant at a maximum of 0.25% v/v instead of crop oil concentrate or methylated seed oil. Temporary crop injury may result when liquid nitrogen is used as the spray carrier. Foliar applied liquid nitrogen may cause foliar leaf burn, yellowing or reduced growth due to the activity of the liquid fertilizer on the crop.

#### Wheat (Including Durum) and Triticale

Apply 6.75 fl oz of Simplicity per acre in either fall or spring to actively growing wheat (including spring, winter and durum) and triticale from the 3-leaf to jointing stage (Zadoks scale 31) for control or suppression of target weeds (refer to section above entitled Weeds Controlled (C) or Suppressed (S)). Treat after the majority of weeds have emerged. Best results are obtained when application is made to weeds that are actively growing.

Occasionally, slight yellowing or height reduction may be observed in the treated crop. These transient symptoms disappear within 14 days with no reduction to yield. Do not apply to crops suffering from drought, water-logged soils, nutrient deficiency or exposed to frost or other agronomic factors affecting plant growth. Do not use on wheat or triticale varieties that are sensitive to ALS herbicides.

**Tank Mixtures:** Simplicity may be applied in tank mix combination with labeled rates of other products registered for postemergence application in wheat or triticale. See Tank Mixing Precautions under Mixing Directions. When tank mixing, do not exceed specified application rates and use only in accordance with the most restrictive precautions and limitations on the respective product labels.

#### Crop Specific Use Restrictions:

- **Preharvest Interval:** Do not apply within 60 days of harvest.
- Do not apply more than a total of 6.75 fl oz of Simplicity per acre per growing season.
- Do not graze the treated crop within 7 days following application.
- Do not cut the treated crop for hay within 28 days following application.
- Do not apply a product containing organophosphates for five days before or five days after an application of Simplicity.

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**Inherent Risks of Use**

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