



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

AUG 19 2010

Subject: Amendment to the Supplemental Label for Control of Herbaceous Broadleaf Weeds and
Woody Plants in Forests and Grazed Areas in and Around These Sites
Milestone® VM Plus
EPA Reg. No. 62719-572
Your Submission, Dated May 24, 2010

Dear Mr. Jachetta:

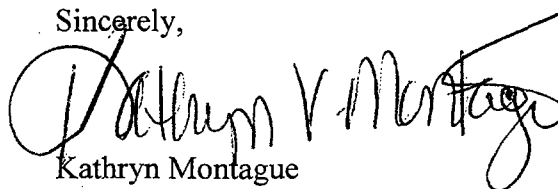
The supplemental labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable, provided you make the following changes:

1. On page 1, in the third line of the paragraph under "Non-Cropland, Forests, and Industrial Non-Crop Areas", revise the statement in parentheses to read "see Application Methods section on the label affixed to the container."
2. On page 1, revise the second sentence of the paragraph under "Non-Cropland, Forests, and Industrial Non-Crop Areas" to read "Do not allow spray containing Milestone VM Plus to come in contact with foliage of desirable tree species."
3. On page 1, revise the last sentence of the paragraph under "Non-Cropland, Forests, and Industrial Non-Crop Areas" to read "Follow Mixing Instructions under the General Mixing and Application Instructions section on the label affixed to the container."
4. On page 2, under "Directed Spray Applications for Conifer Release" insert the following statement after the first sentence (as proposed in the e-mail message from Amy Hudson to Susan Stanton, dated 06/17/2010): "See Spot Application section below for rates and mixing instructions."
5. On page 2, under "Spot Application", delete "Use of" from the beginning of the third sentence so that it reads "A high quality non-ionic agricultural surfactant may be added"

Our records indicate that this supplemental label was first submitted to the Agency by Notification on 05/22/2007. Since supplemental labeling must be reviewed and accepted by EPA before being distributed, EPA erred in accepting the 05/22/2007 submission as a notification. In the future, you must submit new supplemental labeling for this and other products as registration amendments. Most changes to the directions for use (DFU) on a supplemental label must also be made by amendment, rather than notification. PR Notice 98-10 allows registrants to make few changes to the DFU by notification.

A stamped copy of your label is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. At your next label printing, or within eighteen (18) months of the date of this letter, whichever comes first, you must incorporate this supplemental labeling into the main product labeling. 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,



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

Enclosure

3/5
ACCEPTED
with COMMENTS
In EPA Letter Dated:
AUG 19 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

62719-572

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Milestone[®] VM Plus

EPA Reg. No. 62719-572

For Control Of Herbaceous Broadleaf Weeds And Woody Plants In Forests And Grazed Areas In And Around These Sites

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 Plus specialty herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of Milestone VM Plus according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container.

Directions for Use

Refer to product package label for further use directions including requirements for the Worker Protection Standard (WPS), Use Precautions and Restrictions, Precautions for Avoiding Spray Drift, Mixing Instructions, Application Directions, and Broadleaf Weeds Controlled.

Non-Cropland, Forests, and Industrial Non-Crop Areas

Milestone[®] VM Plus specialty herbicide may be applied to non-cropland, forests, and industrial non-crop areas as an aerial or ground broadcast application, as a spot application, or as a high volume foliar application (see Application Methods section) to control herbaceous broadleaf weeds and woody plants. Avoid spray containing Milestone VM Plus from coming in contact with foliage of desirable tree species. Milestone VM Plus 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 General Mixing and Application Instructions section below.

Forest Management Applications

For best control from broadcast and directed spray applications of Milestone VM Plus, use a spray volume which will provide thorough plant coverage. Recommended spray volumes are usually 10 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground. To improve spray coverage of spray volumes less than 50 gallons per acre, add an agriculturally labeled non-ionic surfactant at rate specified on surfactant label.

Forest Site Preparation (Not for Conifer Release)

Use up to 9 pints of Milestone VM Plus and apply in a total spray volume of 10 to 30 gallons per acre. Use a non-ionic agricultural surfactant for all foliar applications. Tank mixtures with other herbicides registered for forest use may be necessary to control woody brush if brush is not susceptible to Milestone

VM Plus. When tank mixtures of herbicides are used for forest site preparation, labels for all products in the mixture must be followed and the longest recommended waiting period before planting observed.

Directed Spray Applications for Conifer Release

Use Milestone VM Plus to release conifers from competing hardwoods such as red maple, sugar maple, striped maple, sweetgum, red and white oaks, ash, hickory, alder, birch, aspen, and pin cherry. To improve spray coverage, add an agriculturally labeled non-ionic surfactant at rate specified on surfactant label. The spray mixture should be directed onto foliage of competitive hardwoods using knapsack or backpack sprayers with flat fan nozzles or equivalent any time after hardwoods have reached full leaf size, but before autumn coloration. The majority of treated hardwoods should be less than 6 feet in height to ensure adequate spray coverage. Care should be taken to direct spray away from contact with conifer foliage, particularly foliage of desirable pines.

Note: Over-the-top spray applications can severely injure or kill some species such as redbud and locust.

Mid-Rotation Understory Brush and Weed Control in Loblolly, Slash, Shortleaf, and Longleaf Pine Stands only.

Apply with ground equipment only for control of herbaceous broadleaf weeds and woody plants in forests (and grazed areas in and around these sites) as broadcast applied or as spot IPT applications for mid-rotation understory brush and weed control in loblolly, slash, shortleaf, and longleaf pine stands only.

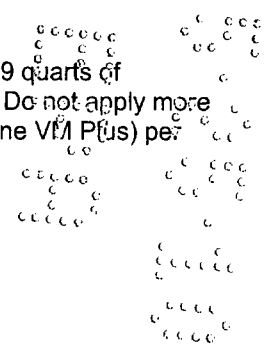
For control of susceptible understory woody species and broadleaf weeds, in loblolly, slash, shortleaf, and longleaf pine stands, apply up to 9 pints of Milestone VM Plus per acre. To broaden the spectrum of woody plants controlled, apply 9 pints of Milestone VM Plus in tank mix combination with additional Forestry Garlon XRT or Garlon 4 Ultra.

These mixtures should be broadcast applied over target understory brush & weed species, with ground equipment only. Backpack IPT or spot applications are also allowed. Make applications underneath the foliage of pines only. Care must be taken to adjust spray equipment such that application is applied uniformly to understory brush/weed foliage only without contacting the crop tree (planted pine) canopy. Some contact with lower pine branches is usually acceptable and tolerated by most crop trees.

Mid-Rotation Understory Application Notes: For best control from broadcast and directed spray applications of Milestone VM Plus, use a spray volume which will provide thorough plant coverage. Recommended spray volumes are usually 10 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground. To improve spray coverage of spray volumes less than 50 gallons per acre, add an agriculturally labeled non-ionic surfactant at recommended rate specified on surfactant label.

Spot Application: Spot applications may be made at rates equivalent to the broadcast-applied rate of 4 to a maximum of 9 pints per acre per annual growing season. Spray volume should be sufficient to thoroughly and uniformly wet weed foliage. Use of a high quality non-ionic agricultural surfactant may be added to the spray mixture as recommended by the surfactant manufacturer. Repeat treatments may be made, but the total amount of Milestone VM Plus applied must not exceed 9 pints per acre per year. To prevent misapplication, spot treatments should be applied with a calibrated boom, boomless spray system, hand-held, or backpack sprayers.

Spot applications may be made at a rate of up to 0.22 lb acid equivalent aminopyralid (9 quarts of Milestone VM Plus) per acre; however, not more than 50% of an acre may be treated. Do not apply more than a total of 0.11 lb acid equivalent aminopyralid per acre (9 pints per acre of Milestone VM Plus) per annual growing season as a result of broadcast, spot or repeat applications.



Cut-Stump Treatment

To control unwanted trees of hardwood species such as elm, maple, oak and conifers, apply Milestone VM Plus, undiluted, by spraying or painting the cut surfaces of freshly cut stumps and stubs as soon as possible after cutting, if possible within about 5 minutes; waiting longer will reduce efficacy due to loss of turgor pressure (suction) in the cut stump. The cambium area next to the bark is the most vital area to wet.

With Tree Injector Method

Apply by injecting 1 milliliter of undiluted Milestone VM Plus 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 undiluted Milestone VM Plus 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 undiluted solution.

Both of the above methods may be used successfully at any season except during periods of heavy sap flow of certain species - for example, maples.

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R886-006
EPA accepted / /
Replaces: R886-005

