

62719 -614

9/30/2010

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

SEP 30 2010

Ms. Niamh McMahon  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46248

Subject: Notification of Name Changes for the Co-Pack Component Products  
Under PR Notice 98-10  
FirstStep™ Herbicide Tank Mix  
EPA Reg. No. 62719-614  
Application, Dated August 20, 2010

Dear Ms. McMahon:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested (Changing name of "EF-1343" to "FirstStep™ A" and "Durango DMA" to "FirstStep™ B") falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

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

Sincerely,

A handwritten signature in cursive script that reads "Susan L. Stanton, for".

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

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

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number Dow AgroSciences LLC/62719-614	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences LLC/FirstStep Herbicide Tank Mix	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application.

Notification - Explain below.  Other - Explain below.

**NOTIFICATION**

**SEP 30 2010**

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

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
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3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product  
 Lithograph  Paper, glued  Stenciled  Other \_\_\_\_\_

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Niamh McMahon	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4609 (fax: 317-337-4649)
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**Certification**  
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Regulatory Manager	6. Date Application Received (Stamped)
4. Typed Name Niamh McMahon (nmcmahon@dow.com)	5. Date August 20, 2010	

Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268-1054



308/2E  
August 20, 2010

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

FIRSTSTEP HERBICIDE TANK MIX (A.I. FLORASULAM, GLYPHOSATE)  
EPA REGISTRATION NUMBER: 62719-614  
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of FirstStep™ Herbicide Tank Mix. The following changes have been made by notification:

1. Changed name of EF-1343 to FirstStep A.
2. Changed name of Durango DMA to FirstStep B.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Contents of Submission**

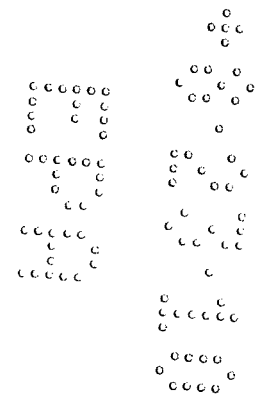
- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled FirstStep (P6J/FirstStep/MSTR Notif/08-20-10) (23 Pages plus Registration Notes) (1 Copy)

If you require further information, please contact Cindy Loy, Regulatory Specialist at (317) 337-4655.

Sincerely,

Niamh McMahon  
Regulatory Leader  
(317) 337-4609  
(317) 337-4649 (FAX)

Enclosures



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# FirstStep™ Herbicide Tank Mix

EPA Reg. No. 62719-614

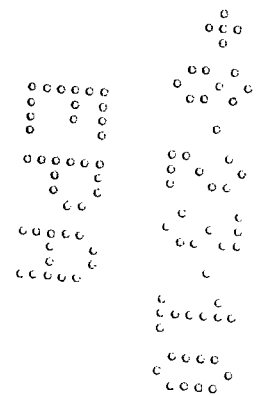
## Registration Notes:

Source label text based on EPA accepted text dated February 24, 2010.

### Changes made by notification:

1. Changed name of EF-1343 to FirstStep A.
2. Changed name of Durango DMA to FirstStep B.

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**NOTIFICATION**

**SEP 30 2010**

[Box label: Label text appearing on outside of box.]

**FirstStep™ Herbicide Tank Mix**

**A multi-pack product containing FirstStep A and FirstStep B herbicides, which must be used together**

**For preseed control of annual broadleaf weeds and grasses in spring wheat (including durum), spring barley, and oats.**

<p><b>FirstStep™ A</b> Herbicide</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 30%;"><b>Group</b></td> <td style="width: 30%;"><b>2</b></td> <td style="width: 40%;"><b>HERBICIDE</b></td> </tr> </table> <p>Active Ingredient:                      florasulam: N-(2,6-difluorophenyl)-8-fluoro-5-methoxy (1,2,4)triazolo(1,5-c)pyrimidine-2-sulfonamide..... 4.84%                      Other Ingredients ..... 95.16%                      Total ..... 100.0%                      Contains 0.42 lb of active ingredient per gallon.</p> <p><b>Keep Out of Reach of Children</b> <b>CAUTION</b></p> <hr/> <p><b>Precautionary Statements</b> <b>Hazards to Humans and Domestic Animals</b></p> <p><b>Harmful If Absorbed Through Skin</b>                      Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.</p>	<b>Group</b>	<b>2</b>	<b>HERBICIDE</b>	<p><b>FirstStep™ B</b> Herbicide</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 30%;"><b>Group</b></td> <td style="width: 30%;"><b>9</b></td> <td style="width: 40%;"><b>HERBICIDE</b></td> </tr> </table> <p>Active Ingredient:                      glyphosate: N-(phosphonomethyl)glycine, dimethylamine salt .....50.2%                      Other Ingredients .....49.8%                      Total..... 100.0%                      Contains 5.4 lb of glyphosate, dimethylamine salt per gallon (4 lb of glyphosate acid per gallon).</p> <p><b>Keep Out of Reach of Children</b> <b>CAUTION</b></p> <hr/> <p><b>Precautionary Statements</b> <b>Hazards to Humans and Domestic Animals</b></p> <p><b>Causes Moderate Eye Irritation • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals</b></p> <p>Avoid contact with skin, eyes or clothing.</p> <p><b>Personal Protective Equipment (PPE)</b>                      Some materials that are chemical-resistant to this product are listed</p>	<b>Group</b>	<b>9</b>	<b>HERBICIDE</b>
<b>Group</b>	<b>2</b>	<b>HERBICIDE</b>					
<b>Group</b>	<b>9</b>	<b>HERBICIDE</b>					

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NOTIFICATION  
SEP 30 2010  
STJ

**Personal Protective Equipment (PPE)**

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves
- 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.

**Engineering Controls**

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

**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.

**First Aid**

**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.

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, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water disposing of equipment washwater or rinsate.

**Groundwater Advisory:** This chemical has properties and characteristics

below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selection chart.

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- 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.

**Engineering Controls**

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in 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.

**First Aid**

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

**If 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.

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**

**Domestic Animals:** This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or

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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.

**Storage and Disposal**

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

**Pesticide Storage:** Store in original container only. Storage below 14°F will cause the product to freeze. If product freezes, bring to room temperature and agitate before use.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site according to label use directions or at an approved waste disposal facility.

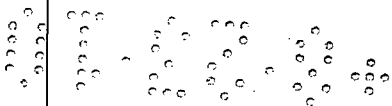
**Container Handling:** Nonrefillable container. Do not reuse or refill this container.

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.

EPA Reg. No. 62719-560

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

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



large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

**Physical or Chemical Hazards**

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

**Do not mix, store or apply this product or spray solutions of this product in galvanized steel or unlined steel (except stainless steel) containers or spray tanks.** This product, or spray solutions of this product react with such containers and tanks to produce hydrogen gas that may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

**Storage and Disposal**

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

**Pesticide Storage:** Store in original container only.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site according to label use directions or at an approved waste disposal facility.

**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.

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	if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.
	EPA Reg. No. 62719-556 EPA Est. _____ <b>Net Contents</b> _____

**Agricultural Use Requirements**  
Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

**Directions for Use:** Refer to inside of label booklet for use directions and additional information.

**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.**

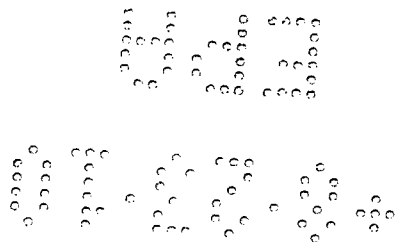
In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

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

FirstStep Herbicide Tank Mix  
EPA Reg. No. 62719-614

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

®™ Trademark of Dow AgroSciences LLC  
**Produced for**  
**Dow AgroSciences LLC**  
**9330 Zionsville Road**  
**Indianapolis, IN 46268**



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[Base label for individual container – FirstStep A]

# FirstStep™ Herbicide Tank Mix

**A multi-pack product containing FirstStep A and FirstStep B herbicides, which must be used together**

**For preseed control of annual broadleaf weeds and grasses in spring wheat (including durum), spring barley, and oats.**

FirstStep Herbicide Tank Mix  
EPA Reg. No. 62719-614

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

## FirstStep™ A

Herbicide

<b>Group</b>	<b>2</b>	<b>HERBICIDE</b>
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Active Ingredient:

florasulam: N-(2,6-difluorophenyl)-8-fluoro-5-methoxy (1,2,4)triazolo(1,5-c)pyrimidine-2-sulfonamide .....	4.84%
Other Ingredients .....	95.16%
Total.....	100.00%

Contains 0.42 lb of active ingredient per gallon.

**Keep Out of Reach of Children**

### CAUTION

#### Precautionary Statements

##### Hazards to Humans and Domestic Animals

###### Harmful If Absorbed Through Skin

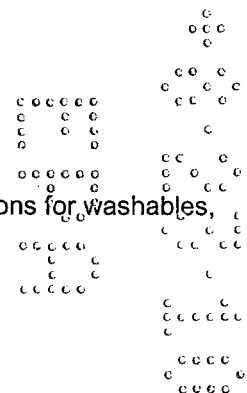
**Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.**

###### Personal Protective Equipment (PPE)

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves
- 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.



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**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.

**First Aid**

**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.

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, 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 rinsate.

**Groundwater Advisory:** This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

**Agricultural Use Requirements**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

**Storage and Disposal**

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

**Pesticide Storage:** Store in original container only. Storage below 14°F will cause the product to freeze. If product freezes, bring to room temperature and agitate before use.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site according to label use directions or at an approved waste disposal facility.

**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.

**Directions for Use:** Refer to inside of label booklet for use directions and additional information.

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

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

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

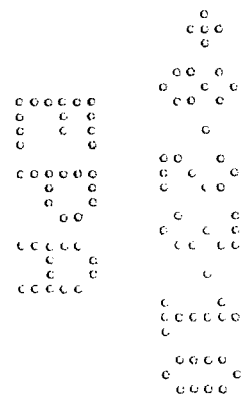
EPA Reg. No. 62719-560

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

™ Trademark of Dow AgroSciences LLC

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

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



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[Base label for individual container – FirstStep B]

# FirstStep™ Herbicide Tank Mix

**A multi-pack product containing FirstStep A and FirstStep B herbicides, which must be used together**

**For preseed control of annual broadleaf weeds and grasses in spring wheat (including durum), spring barley, and oats.**

FirstStep Herbicide Tank Mix  
EPA Reg. No. 62719-614

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

## FirstStep™ B

Herbicide

<b>Group</b>	<b>9</b>	<b>HERBICIDE</b>
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Active Ingredient:

glyphosate: N-(phosphonomethyl)glycine, dimethylamine salt .....	50.2%
Other Ingredients .....	49.8%
Total .....	100.0%

Contains 5.4 lb of glyphosate, dimethylamine salt per gallon (4 lb of glyphosate acid per gallon).

**Keep Out of Reach of Children**

### CAUTION

#### Precautionary Statements

##### Hazards to Humans and Domestic Animals

**Causes Moderate Eye Irritation • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals**

**Avoid contact with skin, eyes or clothing.**

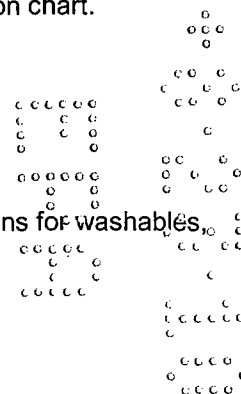
##### Personal Protective Equipment (PPE)

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

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- 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.



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## Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in 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.

## First Aid

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

**If 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.

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

**Domestic Animals:** This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

## Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

**Do not mix, store or apply this product or spray solutions of this product in galvanized steel or unlined steel (except stainless steel) containers or spray tanks.** This product, or spray solutions of this product react with such containers and tanks to produce hydrogen gas that may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

## Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

## Storage and Disposal

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

**Pesticide Storage:** Store in original container only.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site according to label use directions or at an approved waste disposal facility.

**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

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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.

**Directions for Use:** Refer to inside of label booklet for use directions and additional information.

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

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

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

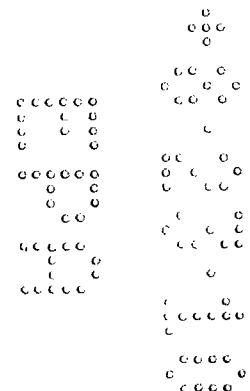
EPA Reg. No. 62719-556

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

™Trademark of Dow AgroSciences LLC

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

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



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[Label booklet cover]

# FirstStep™ Herbicide Tank Mix

**A multi-pack product containing FirstStep A and FirstStep B herbicides, which must be used together**

**For preseed control of annual broadleaf weeds and grasses in spring wheat (including durum), spring barley, and oats.**

**Keep Out of Reach of Children**

## CAUTION

### Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

**Directions for Use: Refer to inside of label booklet for use directions and additional information.**

**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.**

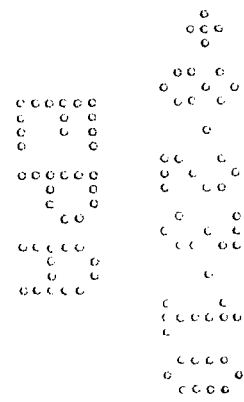
In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

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

FirstStep Herbicide Tank Mix  
EPA Reg. No. 62719-614

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



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(inside booklet)

# FirstStep™ A

## Herbicide

<b>Group</b>	<b>2</b>	<b>HERBICIDE</b>
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**Active Ingredient:**

florasulam: N-(2,6-difluorophenyl)-8-fluoro-5-methoxy (1,2,4)triazolo(1,5-c)pyrimidine-2-sulfonamide ..... 4.84%

Other Ingredients ..... 95.16%

Total..... 100.00%

Contains 0.42 lb of active ingredient per gallon.

### Keep Out of Reach of Children

## CAUTION

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

#### Harmful If Absorbed Through Skin

**Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.**

#### Personal Protective Equipment (PPE)

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves
- 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.

#### 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.

### First Aid



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**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.

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, 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 rinsate.

**Groundwater Advisory:** This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

**Agricultural Use Requirements**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

**Storage and Disposal**

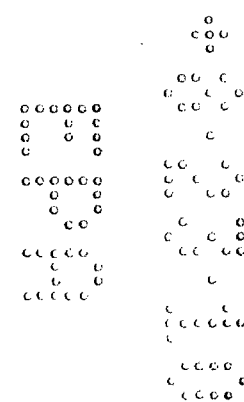
Do not contaminate water, food, or feed by storage and disposal.

**Pesticide Storage:** Store in original container only. Storage below 14°F will cause the product to freeze. If product freezes, bring to room temperature and agitate before use.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site according to label use directions or at an approved waste disposal facility.

**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.



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# FirstStep™ B

## Herbicide

<b>Group</b>	<b>9</b>	<b>HERBICIDE</b>
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**Active Ingredient:**

glyphosate: N-(phosphonomethyl)glycine, dimethylamine salt .....	50.2%
Other Ingredients .....	49.8%
Total .....	100.0%

Contains 5.4 lb of glyphosate, dimethylamine salt per gallon (4 lb of glyphosate acid per gallon).

### Keep Out of Reach of Children

## CAUTION

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**Causes Moderate Eye Irritation • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals**

**Avoid contact with skin, eyes or clothing.**

#### Personal Protective Equipment (PPE)

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

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- 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.

#### Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in 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.

### 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.

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**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.

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**

**Domestic Animals:** This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

**Physical or Chemical Hazards**

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

**Do not mix, store or apply this product or spray solutions of this product in galvanized steel or unlined steel (except stainless steel) containers or spray tanks.** This product, or spray solutions of this product react with such containers and tanks to produce hydrogen gas that may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

**Agricultural Use Requirements**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

**Storage and Disposal**

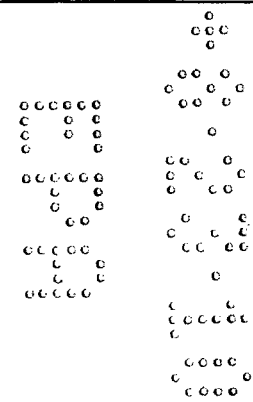
Do not contaminate water, food, or feed by storage and disposal.

**Pesticide Storage:** Store in original container only.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site according to label use directions or at an approved waste disposal facility.

**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.



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# FirstStep™ Herbicide Tank Mix

**A multi-pack product containing FirstStep A and FirstStep B herbicides, which must be used together**

**For preseed control of annual broadleaf weeds and grasses in spring wheat (including durum), spring barley, and oats.**

## 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 4 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

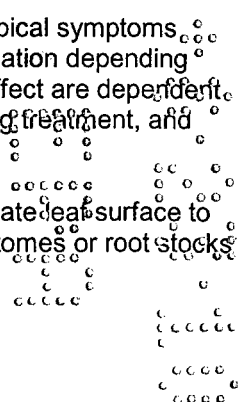
### Information

FirstStep Herbicide Tank Mix will control annual broadleaved weeds and grasses when applied in the spring prior to planting spring wheat (including durum), spring barley and oats. Mix FirstStep Herbicide Tank Mix with water and apply as a uniform broadcast spray.

FirstStep Herbicide Tank Mix must be applied to emerged, actively growing weeds. Warm, moist growing conditions promote active weed growth and enhance the activity of FirstStep Herbicide Tank Mix 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.

FirstStep Herbicide Tank Mix rapidly stops growth of susceptible weeds. However, typical symptoms (discoloration) of dying weeds may not be noticeable for one to two 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.

Delay application until weeds have emerged to the stages described to provide adequate leaf surface to receive the herbicide. Unemerged weeds or vegetation arising from underground rhizomes or root stocks



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of perennials will not be affected by the herbicide and will continue to grow. For this reason, best control of most perennial weeds is obtained when treatment is made at late growth stages approaching maturity.

**Use Precautions and Restrictions**

- When applying this product in tank mix combination, follow all applicable use directions, precautions, and limitations on each manufacturer’s label.
- **Chemigation:** Do not apply this product through any type of irrigation system.
- Do not allow spray mist to drift since even very small quantities of spray can cause severe damage or destruction to nearby crops, plants or other areas on which treatment is not intended. It may also cause other unintended consequences.
- For best resistance management stewardship, do not use more than once per season.
- This product has the potential to leach. Do not apply excessive irrigation.
- Do not apply to crops underseeded with legumes.
- Do not treat weeds under poor growing conditions such as drought stress, disease or insect damage, as reduced weed control may result. Reduced results may also occur when treating weeds heavily covered with dust.
- This product does not provide residual weed control. For subsequent residual weed control, follow a label approved herbicide program. Read and carefully observe the precautionary statement and all other information appearing on the labels of all herbicides used.
- Heavy rainfall immediately after application may wash the herbicide off of the foliage and a repeat treatment may be required. Do not apply if rainfall is forecast for the time of application.
- For best results, spray coverage should be uniform and complete. Do not spray weed foliage to the point of runoff.

**Crop Rotation Intervals**

The following rotational crops may be planted at the indicated interval following application of FirstStep Herbicide Tank Mix.

Numbers in parentheses (-) refer to Specific Crop Rotation Information.

Crop	Rotation Interval (1) (Months)
barley, oats, wheat, grasses	0
field corn, popcorn, seed corn, sweet corn, sorghum	3
alfalfa, canola, chickpea, soybean, dry bean, field pea, flax, lentil, potato, safflower, sugar beet, sunflower	9
other crops not listed	12

**Specific Crop Rotation Information:**

1. Minimum number of months that must elapse before planting other crops after application of FirstStep Herbicide Tank Mix.

**Herbicide Resistance Management**

The mode of action of FirstStep Herbicide Tank Mix is the inhibition of the acetolactate synthase (ALS) enzyme. Weed populations may develop biotypes that are resistant to different herbicides with the same mode of action. If herbicides with the same mode of action are used repeatedly in the same field, resistant biotypes may eventually dominate the weed population and may not be controlled by these products. Other resistance mechanisms, such as enhanced metabolism, may also exist and may cause reduced weed control. FirstStep Herbicide Tank Mix may not reliably control known ALS resistant weed biotypes.

FirstStep Herbicide Tank Mix contains a Group 2 and a Group 9 herbicide. Any weed population may



contain plants naturally resistant to FirstStep Herbicide Tank Mix and other Group 2 and/or Group 9 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same fields. 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 development of herbicide resistance, the following practices are recommended:

- Where possible, rotate the use of FirstStep Herbicide Tank Mix and other Group 2 or Group 9 herbicides with different herbicide groups that control the same weeds in a field.
- Use tank mixtures containing herbicides with different modes of action provided the products are registered for the intended use.
- Base herbicide use on a comprehensive Integrated Pest Management (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 in the field for loss of effectiveness.
- Prevent movement of resistant weed seeds to other fields by cleaning harvesting and tillage equipment and planting clean seed.
- Contact your local extension specialist, certified crop advisor, and or manufacturer for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.

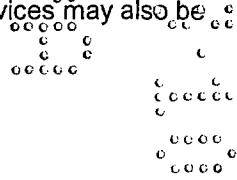
**Avoid Injurious Spray Drift**

This product can affect broadleaf plants directly through foliage and indirectly by root uptake from treated soil. Do not apply FirstStep Herbicide Tank Mix directly to, or allow spray drift to come into contact with, broadleaf crops including alfalfa, canola, beans, cotton, flowers, grapes, lettuce, lentils, mustard, 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 FirstStep Herbicide Tank Mix, 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 restrictions and precautions on the product label.

**Ground Applications:** To minimize spray drift, apply FirstStep Herbicide Tank Mix in a total spray volume of 8 gallons or more per acre using spray equipment designed to produce large-droplet, low pressure sprays. Refer to the spray equipment manufacturer's recommendations for detailed information on nozzle types, arrangement, spacing and operating height and pressure. Spot treatments should be applied 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 insecticide nozzles or other nozzles that produce a fine-droplet spray.

**Aerial Application:** To minimize spray drift, apply FirstStep Herbicide Tank Mix in a total spray volume of 3 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 making 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 that does not exceed 75% of wingspan or 90% of rotor diameter. 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.



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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).

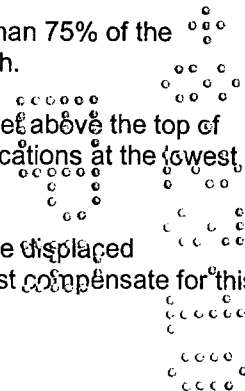
**Controlling Droplet Size:**

- **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 recommended 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 airstream produces larger droplets than other orientations and is the recommended practice. 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:** 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.

**Sensitive Areas:** The pesticide should only be applied 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).

#### Ammonium Sulfate

The addition of 1 to 2% dry ammonium sulfate by weight or 8.5 to 17 lb per 100 gallons of water may increase the performance of this product, particularly when tank mixed with certain residual herbicides on annual and perennial weeds. The equivalent rate of ammonium sulfate in a liquid formulation may also be used. Ensure that ammonium sulfate is completely dissolved in the spray tank before adding herbicides. Thoroughly rinse the spray system with clean water after use to reduce corrosion. **Note:** When using ammonium sulfate, apply this product at rates specified in this label. Lower rates will result in reduced performance.

#### Mixing Directions

1. Fill the spray tank with 1/2 of the total amount of water.
2. Start agitation.
3. Add the required amount of ammonium sulfate.
4. Add the required amount of FirstStep A.
5. Add the required amount of FirstStep B.
6. Continue agitation while filling the spray tank to the required volume. Allow time for complete mixing and dispersion after each addition.
7. 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.
8. After FirstStep A and FirstStep B are mixed, follow the most restrictive directions, precautions and limitations on the two product labels.

#### Tank Mixing Precautions:

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not exceed specified application rates for respective products or maximum allowable application



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- 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.

**Tank Mix Compatibility Testing:** A jar test is recommended prior to tank mixing to ensure compatibility of FirstStep Herbicide Tank Mix 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 proper amounts of both components of FirstStep Herbicide Tank Mix and agitate for 2 to 3 minutes
4. After adding both components of FirstStep Herbicide Tank Mix, 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.
2. Hose down the interior surfaces of the tank while filling the tank 1/2 full of water.
3. Add household ammonia at a rate of 1 gallon per 100 gallons of water. Recirculate for 5 minutes and spray out part of this mixture for 5 minutes through the boom. Drain tank.
4. Remove all spray nozzles and screens and clean separately.
5. If spray equipment will be used for pesticide application to crops sensitive to FirstStep Herbicide Tank Mix, steps 1 through 3 should be repeated. Exterior surfaces of spray equipment should also be thoroughly cleaned.

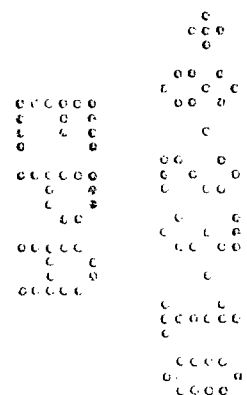
**Note:** Rinsate may be disposed of on site according to label use directions or at an approved waste disposal facility.

**Weeds Controlled or Suppressed**

**Weeds Controlled**

Annual Broadleaf Weeds

- |                                    |   |
|------------------------------------|---|
| bedstraw, catchweed (cleavers)     | mustard, wild                           |
| buckwheat, wild (up to 5 leaves)   | narrow-leaved hawk's beard <sup>2</sup> |
| canola, volunteer <sup>1</sup>     | pennycress, field                       |
| chickweed, common                  | pigweed, redroot                        |
| flax, volunteer                    | ragweed, common <sup>2</sup>            |
| flixweed                           | shepherdspurse                          |
| hempsnettle                        | smartweed, ladysthumb                   |
| horseweed (marestail) <sup>2</sup> | tansymustard                            |
| lambsquarters                      | thistle, Russian                        |



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Annual Grasses

barley, volunteer	foxtail, yellow
brome, downy	oats, wild
foxtail, giant	Persian darnel
foxtail, green	wheat, volunteer

Perennial Weeds

dandelion<sup>4</sup>

**Weeds Suppressed**

kochia	sowthistle, perennial <sup>3</sup>
sowthistle, annual	

<sup>1</sup>Including all herbicide-tolerant canola varieties.

<sup>2</sup>Less than 3 inches in height.

<sup>3</sup>Efficacy will be reduced when applications are made at advanced growth stages.

<sup>4</sup>Up to 6 inches in diameter.

**Application Directions for Spring Wheat (Including Durum), Spring Barley and Oats**

**Application Timing**

Apply FirstStep A at a rate of 1.34 fl oz per acre tank mixed with FirstStep B at a rate of 13.5 fl oz per acre in the spring prior to planting spring wheat (including durum), spring barley and oats. At these rates, one case of FirstStep Herbicide Tank Mix (0.42 gallons of FirstStep A plus 4.22 gallons of FirstStep B) will treat 40 acres. In the spring, apply from 10 days prior to seeding until two days after seeding. If applied after seeding, do not apply if soil has begun cracking over the drill row from emerging crop seedlings.

Target actively growing weeds in the 2 to 4 leaf stage except where noted in the Weeds Controlled or Suppressed section. Extreme growing conditions such as drought or near freezing temperatures prior to, at, or following time of application may reduce weed control and increase the risk of crop injury at all stages of growth. Only weeds that have emerged at the time of application are controlled. If foliage is wet at the time of application, control may be decreased.

**Spray Coverage**

Use sufficient spray volume to provide thorough coverage and a uniform spray pattern. Do not broadcast apply in less than 3 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, 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 in Avoid Injurious Spray Drift section.

**Restrictions:**

- **Preharvest Interval:** Do not apply with 60 days before grain harvest.
- Do not apply more than 1.34 fl oz of FirstStep A per acre per growing season.
- Livestock may be grazed on treated crops seven days following application.

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