

62719-614

8/3/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

AUG - 3 2011

Ms. Niamh McMahon
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

Dear Ms. McMahon:

RE: YOUR ADMINISTRATIVE LETTER DATED May 12, 2011; FIRSTSTEP HERBICIDE TANK MIX (AI: FLORASULAM, GLYPHOSATE); EPA REG. NO. 62719-614; AMENDED MAIN LABEL

The requested draft label is approved without comment.

This label supersedes all preceding labels. Products shipped after eighteen months from the date of this letter must bear the new revised label. You must submit one copy of the final printed label before you release the product for shipment. A stamped Accepted label is enclosed for your files.

Please contact Phil Errico at 703-305-6663/ errico.philip@epa.gov for any assistance in this matter.

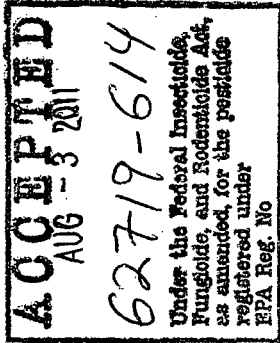
Kind Regards,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn V. Montague, PM 23
Herbicide Branch/Registration Division 7505P

[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 wheat (including durum), barley, triticale, and oats.

FirstStep® A

Herbicide

| Group | 2 | HERBICIDE |
|-------|---|-----------|
|-------|---|-----------|

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.

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.

FirstStep® B

Herbicide

| Group | 9 | HERBICIDE |
|-------|---|-----------|
|-------|---|-----------|

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

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|---|---|
| <p>Personal Protective Equipment (PPE) Applicators and other handlers must wear:</p> <ul style="list-style-type: none"> • Long-sleeved shirt and long pants • Chemical-resistant gloves • Shoes plus socks <p>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.</p> <p>Engineering Controls</p> <p>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.</p> | <p>below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selection chart.</p> <p>Applicators and other handlers must wear:</p> <ul style="list-style-type: none"> • Long-sleeved shirt and long pants • Chemical-resistant gloves made of any waterproof material • Shoes plus socks <p>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.</p> <p>Engineering Controls</p> <p>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.</p> |
| <p>User Safety Recommendations</p> <p>Users should:</p> <ul style="list-style-type: none"> • 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. | <p>User Safety Recommendations</p> <p>Users should:</p> <ul style="list-style-type: none"> • Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. |
| <p>First Aid</p> <p>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.</p> <p>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.</p> | <p>First Aid</p> <p>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.</p> <p>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.</p> |
| <p>Environmental Hazards</p> <p>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.</p> <p>Groundwater Advisory: This chemical has properties and characteristics</p> | <p>Environmental Hazards</p> <p>Domestic Animals: This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or</p> |

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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.

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

[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 wheat (including durum), barley, triticale, and oats.

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

EPA Est. _____

FirstStep[®] A

Herbicide

| Group | 2 | HERBICIDE |
|-------|---|-----------|
|-------|---|-----------|

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

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. _____

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**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 wheat (including durum), barley, triticale, and oats.

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

EPA Est. _____

FirstStep[®] B

Herbicide

| | | |
|-------|---|-----------|
| Group | 9 | HERBICIDE |
|-------|---|-----------|

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.

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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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[Cover, shipping container]

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 wheat (including durum), barley, triticale, 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.

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

®Trademark of Dow AgroSciences LLC

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

(inside booklet)

FirstStep® A

Herbicide

| | | |
|--------------|----------|------------------|
| Group | 2 | HERBICIDE |
|--------------|----------|------------------|

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.

| |
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| <p>User Safety Recommendations</p> <p>Users should:</p> <ul style="list-style-type: none"> • 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. |
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|------------------|
| 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

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FirstStep® B

Herbicide

| | | |
|--------------|----------|------------------|
| Group | 9 | HERBICIDE |
|--------------|----------|------------------|

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

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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
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- Shoes plus socks

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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.

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 wheat (including durum), barley, triticale, 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

Product Information

Use FirstStep Herbicide Tank Mix in the spring or fall prior to planting, or as a summer (chemical) fallow application for the control of annual broadleaf and grass weeds such as chickweed, wild buckwheat, mustards, cleavers, foxtails, downy brome and wild oat. Applications may be made in fields to be seeded to wheat (including durum), barley, oats, rye and triticale not underseeded with legumes. 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 species, sensitivity, weed size, crop competition, growing conditions immediately prior to and following treatment, and spray coverage.

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Delay application until weeds have emerged to the stages described to provide adequate leaf surface to receive the herbicide. Unemerged weed seedlings or vegetation arising from underground rhizomes or root stocks of perennials will not be affected by the herbicide. 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.

Herbicide Resistance Management

FirstStep Herbicide Tank Mix contains two modes of action, inhibition of the acetolactate synthase (ALS) enzyme and inhibition of the 5-enolpyruvylshikimate-3-phosphate synthase (EPSP) 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 or EPSP 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 herbicide resistance development:

- 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.
- Tank mix 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 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.

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, peas (dry and succulent), 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.

Avoid Injurious Spray Drift

This product can affect sensitive plants directly through foliage or 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, sensitive 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. Do not allow spray to drift onto soil where sensitive crops will be planted the same season. (See Crop Rotation Intervals section.)

Apply only when there is little or no hazard of 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 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. Apply spot treatments 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 when wind speed is 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.

Do not apply under conditions of a low level air temperature inversion. A temperature inversion is characterized by little or no wind with 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 with 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 regarding the application.

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 must 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 least drift.

Boom Width: For some use patterns, reducing the effective boom width to less than 75% of the wingspan or 90% of rotor width 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 effective spray 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 influence spray drift.

Temperature and Humidity: When making applications in low relative humidity, adjust equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe with high air temperature and low humidity.

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 past sunrise. 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).

Mixing Directions

FirstStep Herbicide Tank Mix - Alone

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 component is added.
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.

FirstStep Herbicide Tank Mix – Tank Mix

If a broader spectrum of weed control is needed, FirstStep Herbicide Tank Mix 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.

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 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: When tank mixing FirstStep Herbicide Tank Mix with other materials, a jar test using relative proportions of the tank mix should be conducted prior to mixing ingredients in the

spray tank. Use a clear glass quart jar with lid and mix the tank mix ingredients, including water or other spray carrier, 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 with water or appropriate carrier to 3/4 of the total spray volume.
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. Do not allow tank mixes to set overnight.

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.

Clean-Out Procedures for Spray Equipment

1. Drain any remaining spray mixture from the application equipment.
2. Rinse 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, repeat steps 1 through 3.
6. Thoroughly clean exterior surfaces of spray equipment.

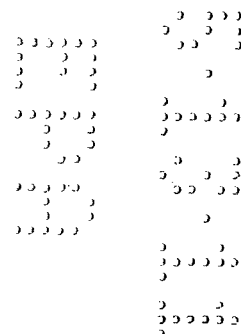
Note: Rinsate may be disposed of on site according to label use directions or at an approved waste disposal facility.

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 ² |
| canola, volunteer ¹ | pennycress, field |
| chickweed, common | pigweed, redroot |



| | |
|------------------------------------|------------------------------|
| flax, volunteer | ragweed, common ² |
| flixweed | shepherdspurse |
| hempnettle | smartweed, ladythumb |
| horseweed (marestail) ² | tansymustard |
| lambsquarters | thistle, Russian |

Annual Grasses

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

Perennial Weeds

dandelion⁴

Weeds Suppressed

| | |
|--------------------|------------------------------------|
| kochia | sowthistle, perennial ³ |
| sowthistle, annual | |

¹Including all herbicide-tolerant canola varieties.

²Less than 3 inches in height.

³Efficacy will be reduced when applications are made at advanced growth stages.

⁴Up to 6 inches in diameter.

Application Directions

Application Timing

Spring Prior to Crop Emergence: Apply FirstStep A at a rate of 1.36 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 wheat (including spring, winter, and durum), barley, rye, triticale, 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.

Summer: When applied as a summer (chemical) fallow application, apply in the initial application to establish summer fallow in the spring or early summer. Do not apply as a summer (chemical) fallow application after July 1.

Fall: Apply FirstStep A at a rate of 1.36 fl oz per acre tank mixed with FirstStep B at a rate of 13.5 fl oz per acre in the fall prior to planting wheat (including durum), barley, rye, triticale, 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.

Apply in the spring, summer or fall as directed above only when weeds are actively growing, 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. Best results are obtained from application made to seedling weeds. 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 or weed density increases, 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 1.36 fl oz of FirstStep A per acre per growing season.
- Livestock may be grazed on treated crops seven days following application.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. Dow AgroSciences **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories) shall be limited to, at Dow AgroSciences' election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

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