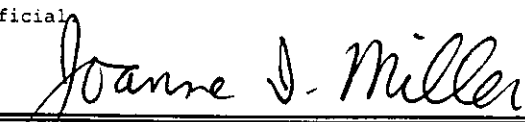
	U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505C) 401 "M" St., S.W. Washington, D.C. 20460	EPA Reg. Number: 70506-117	Date of Issuance: NOV 4 2005	
	NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> Registration <input type="checkbox"/> Reregistration (under FIFRA, as amended)	Term of Issuance: Conditional		Name of Pesticide Product: Clopyr Brush
	Name and Address of Registrant (include ZIP Code): United Phosphorus Inc. 423 River View Plaza Trenton, NJ 08611			
<p>Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</p> <p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.</p> <p>Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:</p> <ol style="list-style-type: none"> 1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit data. 2. Make the following label changes listed below before you release the product for shipment: <ol style="list-style-type: none"> a. Add the phrase, "EPA Reg. No. 70506-117". b. In the Hazards to Humans section add the following: Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. 				
Signature of Approving Official 		Date: NOV 4 2005		

page 2

EPA Reg. No. 70506-117

3. Submit one (1) copy of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

4. Submit the results of storage stability (GRN 830.6317) and corrosion characteristics (GRN 830.6320) studies to EPA upon completion.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

CLOPYR BRUSH

CLOPYR BRUSH may be used for selective postemergence control of mesquite and certain associated woody species on rangeland and permanent grass pastures in the following states: Arizona, New Mexico, Oklahoma and Texas

ACTIVE INGREDIENT:

clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid, monoethanolamine salt 40.9%

OTHER INGREDIENTS: 59.1%

TOTAL: 100.0%

Acid Equivalent: clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid - 31% (3 lb/gal)

Keep Out of Reach of Children

CAUTION PRECAUCION

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

For 24-Hour Emergency Contact, call CHEMTREC (1-800-424-9300)

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present; after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

NOV 4 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

70506-117

EPA Reg. No. 70506-

Manufactured For:
United Phosphorus, Inc.
Trenton, NJ 08611

EPA Est. No.

Net Contents:

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Do not contaminate water used for irrigation or domestic purposes.

Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions contaminate groundwater which may be used for irrigation or drinking purposes. Users are advised not to apply clopyralid where soils have a rapid to very rapid permeability throughout the profile (such as loamy sand to sand) and the water table of an underlying aquifer is shallow, or to soils containing sinkholes over limestone bedrock, severely fractured surfaces, and substrates which could allow direct introduction into an aquifer. Your local agricultural agencies can provide further information on the type of soil in your area and the location of groundwater.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

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" elsewhere on this label. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 800-424-9300.

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

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.

GENERAL INFORMATION

CLOPYR BRUSH is a highly active, water-soluble liquid product for control of mesquite and certain associated woody species such as catclaw acacia and twisted acacia on rangeland and permanent grass pastures in the following states:

- Arizona
- New Mexico
- Oklahoma
- Texas

This product affects plants directly through foliage and indirectly by root uptake from treated soil. Very small amounts of this product can kill or injure sensitive broadleaf plants. Follow all directions and precautions on this label to prevent accidental damage to crops and other desirable plants.

Avoiding Injury to Non-Target Plants

Because CLOPYR BRUSH can affect broadleaf plants by either foliar contact or root uptake, it should not be applied either directly or indirectly (via spray drift) to the following: Vegetables, ornamentals, various susceptible broadleaf crops or other susceptible desirable non-target plants.

Avoid Residues from Plants or Manure:

- Do not use plant materials from treated areas or manure from animals that have grazed or consumed forage from areas treated with CLOPYR BRUSH to compost or mulch where susceptible plants may be grown the following season. Plant materials and manure may contain enough clopyralid to cause injury to susceptible plant species.

Avoid Spray Drift:

- Because very small quantities of this product can severely injure sensitive or susceptible crops during their active growth or dormant periods, avoid spray drift from coming in contact with these crops.
- Use as coarse a spray as possible to minimize drift.
- To aid in reducing spray drift, use a drift control or deposition agent suitable for agricultural applications with this product. Follow all use recommendations and precautions on the product label.

When applying with ground equipment, spray drift can be reduced by doing the following:

- **Do not under any circumstances apply with a mist blower.**
- Apply 10 or more gallons of spray per acre
- Keep the spray boom as low as possible
- Keep the operating spray pressures at the manufacturer's minimum recommended pressures for the specified nozzle type used (low pressure nozzles are available from spray equipment manufacturers)
- Spray when the wind velocity is low (follow all state regulations), but avoid applications in completely calm conditions which may lead to air inversions.
- In hand-gun applications, use the minimum pressure necessary to obtain adequate plant coverage without forming a mist.

When applying with aircraft, spray drift can be reduced by doing the following:

- **Do not apply by aircraft when an air temperature inversion condition exists.** This situation is characterized by little or no wind and lower air temperature near the ground than at higher levels. The use of a smoke device on the aircraft or continuous smoke column at or near the site of application will indicate air direction and velocity, and whether a temperature inversion is present, as indicated by horizontal layering of the smoke.
- Use straight stream nozzles directed straight back
- Use a spray boom no longer than $\frac{3}{4}$ the wing span of the aircraft
- Use drift control systems or drift control additives, however, do not use a thickening agent with systems that cannot handle thick sprays (such as the Microfoil or Thru-Valve booms).
- Keep spray pressures low enough to provide coarse spray droplets.
- Spray only when wind velocity is low (follow all state regulations), but avoid applications in completely calm conditions which may lead to air inversions.

Sprayer Clean-Out:

To avoid injury to desirable plants, equipment used to apply CLOPYR BRUSH should be thoroughly cleaned before re-using to apply any other chemicals.

1. Rinse and flush application equipment thoroughly after use at least three times with water. Dispose of all rinse water by application to treatment area or apply to non-cropland area away from water supplies.
2. During the second rinse, add 1 qt of household ammonia for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15-20 min). Let the solution stand for several hours, preferably overnight.
3. Flush the solution out of the spray tank through the boom.
4. Rinse the system twice with clean water, recirculating and draining each time.
5. Remove nozzles and screens and clean separately.

MIXING INSTRUCTIONS

Water Dilution – To prepare a water dilution of CLOPYR BRUSH:

Note: Allow time for thorough mixing of each spray ingredient before adding the next.

1. Add $\frac{3}{4}$ of the water volume to the spray tank and begin agitation.
2. Add the amount of CLOPYR BRUSH indicated in this label.
3. Add any surfactants, crop oils, or other adjuvants according to manufacturer's label(s).
4. If needed to control drift, add any spray thickening agents according to the manufacturer's label.
5. Continue agitation during final filling of the spray tank and maintain agitation during application. If allowed to stand after mixing, agitate the spray mixture before use.

Oil-Water Emulsion

Spray mixtures prepared as oil-water emulsions perform more dependably than water or water plus surfactant dilutions. Either diesel fuel, fuel oil or kerosene may be used. **NOTE: For either ground or aerial applications, do not use more than 1 gallon of oil per acre.**

- For aerial application, add oil to the spray mix at the ratio of 1 part oil to 5 parts water. Use an appropriate agricultural spray emulsifier (such as Sponto 712 or Triton X-100) according to the manufacturer's recommended rate.
- For ground application, add oil to the total spray mix at the rate of 5 to 10 percent of total volume up to a maximum of 1 gallon of oil per acre.

A jar test is recommended prior to large scale batch mixing of CLOPYR BRUSH.

1. Using a clear glass quart jar with lid, mix the tank mix ingredients in their relative proportions.
2. Thoroughly shake the jar to mix the ingredients.
3. For the next 30 minutes, observe the mixture for signs of balling-up, formation of flakes, sludges, gels, oily films or layers, or other precipitates. If any of these are observed, it is not compatible and the tank mix combination should not be used.

Suggested Mixing and Application Procedure for Oil-Water Emulsions

1. NOTE: Maintain continuous, vigorous mechanical, jet or by-pass agitation during the entire process:
2. Add ½ the amount of water to be used to the spray mixing tanks.
3. Add the label indicated amount of CLOPYR BRUSH required for the total volume of spray being mixed.
4. With agitation operating, add the oil-emulsifier premix slowly to the mixing tank. NOTE: Any oil and / or emulsifier to be added must be premixed. Refer to the manufacturer's label for use directions and confirm the amount of emulsifier that should be used with a preliminary jar test.
5. Finally, add the remaining amount of water required to bring the spray batch to the desired volume. If using a drift control additive, meter this ingredient into the water being added during this final filling stage and check spray mixture for complete dispersion.
6. Maintain agitation in the spray tank during application.

USE PRECAUTIONS

- Do not apply more than 1-1/3 pts. CLOPYR BRUSH per annual growing season.
- Do not apply this product through any type of irrigation system.
- Do not plant broadleaf crops in treated areas until conducting a bioassay.

Field Bioassay Instructions:

- 1) A field bioassay may be done at any time prior to planting of the intended rotational crop.
 - 2) Plant test rows of the rotational crop so as to represent all different field conditions such as soil texture, soil pH, drainage, and any other variable that could affect the seed bed of the new crop.
 - 3) Observe the test rows of crop for signs of herbicidal activity such as poor germination, chlorosis (yellowing), necrosis (dead leaves or shoots), or stunting (reduced growth).
 - 4) The test crop can be grown if herbicidal effects are not observed. Do not plant the field to the desired rotational crop if any herbicidal activity is observed; wait one year before repeating the bioassay or plant a crop tolerant to clopyralid such as barley, canola (rapeseed), grasses, field corn, oats, sugar beets, or wheat.
- Do not contaminate irrigation ditches or water used for irrigation or domestic purposes.
 - To maximize woody plant control, do not disturb treated plants or remove by mechanical means or by fire for at least 1 year after application.
 - When CLOPYR BRUSH is used at labeled rates, there are no restrictions on grazing of treated areas. However, because of standing woody plants hay harvest is not considered to be feasible for at least 1 year following application.
 - Do not spray pastures containing desirable broadleaf plants, especially legumes, unless injury can be tolerated. However, the stand and growth of established perennial grasses is usually improved after controlling broadleaf weeds, especially when rainfall is adequate and grazing is deferred.
 - Observe the label of other products used in tank mixtures and follow all applicable label directions. If directions on this label and tank mix partners differ, follow the most restrictive label directions.

- Do not use in newly seeded areas until grass is established.

RANGELAND AND PERMANENT GRASS PASTURES

Application Instructions

- Apply CLOPYR BRUSH as a coarse low-pressure spray using ground equipment or aircraft.
- Use sufficient spray volume to provide uniform coverage of target vegetation.

MESQUITE CONTROL

- For best results, apply when new growth foliage has turned from light to dark green and soil moisture is adequate for plant growth.
- Avoid treatment if mesquite exhibits new terminal (light green) growth, usually after a heavy rainfall during the growing season.
- Apply when soil moisture is adequate for active growth.
- A soil temperature above 75°F at a depth of 12 to 18 inches is optimal for good plant kills. Soil temperature of less than 75°F at this depth will reduce the amount of root kill. Application should be made within 60 days after the minimum soil temperature of 75°F at a depth of 12 to 18 inches has been reached.
- To maximize woody plant control, do not disturb treated plants or remove by mechanical means or by fire for at least 1 year after application.
- Do not reapply CLOPYR BRUSH during the same growing season. Re-treatment is not effective until woody plants have developed sufficient new foliage to intercept the spray and provide uptake adequate to control the plant when translocated to the root system. Following mechanical removal, mesquite regrowth should be at least 4 feet tall before application of CLOPYR BRUSH.
- Unsatisfactory control of rangeland brush or weeds may be observed under adverse growing conditions such as severe drought stress.

When CLOPYR BRUSH is used at labeled rates, there are no restrictions on grazing of treated areas. However, because of standing woody plants hay harvest is not considered to be feasible for at least 1 year following application.

NOTE: Mesquite treated with CLOPYR BRUSH often reacts differently than when treated with other herbicides. Complete brownout and leaf drop of treated mesquite may be delayed and not occur before the first frost. Discoloration and rupture and/or "bleeding" of bark on branches and trunks may also be observed.

Broadcast Ground or Aerial Application: Use CLOPYR BRUSH alone or in combination with Remedy™ herbicide or Tordon™ 22K herbicide as recommended in the table below.

Brush Species	Application Rates (pint/acre)	Specific Use Recommendations
Mesquite	1 1/3 CLOPYR BRUSH or 2/3 – 1 1/3 CLOPYR BRUSH plus ½ - 1 Remedy™ or 2/3 – 1 1/3 CLOPYR BRUSH plus 2 Tordon™ 22K	Apply as a water spray or oil-water emulsion (see "Mixing Instructions") in a total spray volume of 4 or more gallons per acre by air or 10 or more gallons per acre by ground application using higher spray volumes with increasing brush and height. Note: Where control of pricklypear cactus is desired, the tank mixture of Reclaim and Tordon™ 22K should be used.
South Texas mixed brush including: mesquite, pricklypear, blackbrush, twisted acacia, catclaw acacia, granjeno and guajillo	2/3 – 1 1/3 CLOPYR BRUSH plus 2 Tordon™ 22K	See "Use Guidelines" section above for information on mesquite treatment. Apply in a spray volume of 4 or more gallons per acre by air or 10 or more gallons per acre by ground application using higher spray volumes with increasing brush and height. For best results, apply as an oil-water emulsion.
Mesquite in Stands of Live Oak	1-1/3 CLOPYR BRUSH by air as a water dilution with surfactant (0.25% v/v) at a total spray volume of 4 or more gallons per acre	Live oak over-sprayed with CLOPYR BRUSH may show a 10 to 20 percent canopy reduction the year of treatment but will recover. CLOPYR BRUSH applied in a tank mix with other herbicides may increase injury to live oak.

Individual Plant Treatment: Low to moderate density infestations of mesquite can be controlled using backpack or hand-held sprayers or a vehicle mounted sprayer with hand-held spray wand or spray gun. This method of treatment is only recommended for brush less than 8 feet tall.

Application Method	Application Rate (pints / acre)	Specific Use Recommendations
High-Volume Leaf Stem Treatment (Ground Application)	3 quarts CLOPYR BRUSH per 100 gallons of spray per acre.	Apply in water or as a 5% oil-water emulsion as described in the "Mixing Instructions" section.
	2 quarts CLOPYR BRUSH + 2 quarts Remedy per 100 gal. spray per acre. (1/2% v/v of each product)	Apply as a complete spray-to-wet foliar application, including all leaves, stems, and root collars. Thorough coverage is required for good results, but do not spray to the point of runoff. If desired, a spray dye may be added to the spray mixture to mark the treated plants.

Minimizing Spray Drift During Individual Plant Treatment:

- Select a spray nozzle and pressure that will provide good coverage while forming a coarse spray.
- Use the minimum pressure necessary to obtain plant coverage without forming a mist
- Direct sprays no higher than the tops of target plants.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store above 28° F or warm to 40° F and agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

United Phosphorus, Inc. 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. United Phosphorus, Inc. **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. Plant 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 United Phosphorus, Inc. or the seller. All such risks shall be assumed by buyer.

LIMITATION OF REMEDIES

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 United Phosphorus, Inc.'s 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

United Phosphorus, Inc. shall not be liable for losses or damages resulting from handling or use of this product unless United Phosphorus, Inc. is promptly notified of such loss or damage in writing. In no case shall United Phosphorus, Inc. be liable for consequential, incidental or special damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of United Phosphorus, Inc. or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner. Buyer accepts this product subject to the foregoing limitations of warranty and of liability.

Remedy™ and Tordon™ are trademarks of Dow AgroSciences LLC.