

81943-17

06/21/2011

1/34



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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Sherry B. Hutcheson
Phoenix Environmental Care, LCC
PO Box 370
Valdosta, GA 31603-0370

JUN 21 2011

Subject: Label Amendment and CSF Amendment
GullWing
EPA Reg. No: 81943-17
Application Dated: 12/20/2010

Dear Ms. Hutcheson

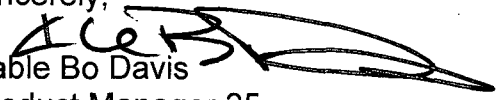
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

The Agency has also reviewed your submission for the revised Confidential Statement of Formula dated February 16, 2011 for the basic formulation. It has been determined that the Confidential Statement of Formula agrees with the label claim in compliance with PR Notice 91-2 and is acceptable. The Confidential Statement of Formula has been added to your file as part of the record, and will supersede all previously submitted Basic CSFs.

If you have any questions, please contact Grant Rowland at (703)347-0254 or at rowland.grant@epa.gov

Sincerely,


Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)

2/84

Draft GullWing Label
June 17, 2011
Revision 4

GullWing

GullWing will control weeds, brush and undesirable aquatic vegetation in the following sites:

Non-Cropland Uses: Fence Rows, Ditch banks (non-irrigation only), Wildlife openings

Industrial/Transportation Uses: Roads, Storage areas, Railroads, Transmission lines, Tank farms, Pipelines, Bareground areas, Pumping stations, Under paved surfaces

Aquatic / Wetland Uses: Estuaries. Marine environments, Vegetation in surface water, Wetlands, Riparian zones

NOTE: *This product is NOT to be used on food crops or Christmas trees.*

ACTIVE INGREDIENT:

Isopropylamine salt of Imazapyr (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid)*27.8%

OTHER INGREDIENTS:72.2%

TOTAL:100.0%

*Equivalent to 22.6% (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid or 2 pounds acid per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

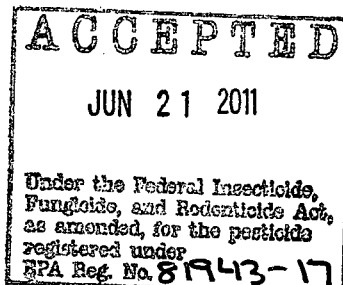
FIRST AID	
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse 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 inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
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 1-888-875-1724 for emergency medical treatment information.	

Net Contents: __ Gallons

EPA Reg. No. 81943-17

EPA Est. No. __

Phoenix Environmental Care, LLC
P.O. Box 370 • Valdosta, GA 31603-0370



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to plants. Drift and run-off may be hazardous to plants in water adjacent to treated areas. Do not apply to water except as specified on the label. Treatment of aquatic weeds may result in oxygen depletion or loss due to decomposition of dead plants. Do not treat more than one half the surface area of the water in a single operation and wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outward in bands to allow aquatic organisms to move into untreated areas. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements.

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.

Mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks,
- Chemical resistant gloves for all mixers and loaders, plus applicators using handheld equipment.

USER SAFETY REQUIREMENTS

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

ENGINEERING CONTROL STATEMENT

Pilots must use an enclosed cockpit that meet the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(6)].

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.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

PHYSICAL OR CHEMICAL HAZARDS

Mix, store and apply spray solutions of GullWing only in stainless steel, fiberglass, plastic and plastic-lined steel containers.

DO NOT mix, store or apply GullWing or spray solutions of GullWing in unlined steel (except stainless steel) containers or spray tanks.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact any person, pet, either directly or through drift. Keep people and pets out of the area during application.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

The following methods of application may be used to apply GullWing:

- Fixed-wing aircraft (for brush control ONLY)
- Helicopters
- Ground operated sprayers
- Backback and pump sprayers
- Tree injection equipment

IMPORTANT NOTE REGARDING AERIAL APPLICATIONS: Applications using fixed-wing aircraft may be made for brush control applications ONLY. Aerial applications to all other use sites including aquatic sites must be made using a helicopter. All other aerial applications (including aerial applications to aquatic sites) must not be made using fixed-wing aircraft and must be made by **HELICOPTER** only.

Precautions:

- To help prevent accidental exposure of desirable vegetation to this product, do not allow this product to come into contact with seeds, fertilizers, insecticides, and fungicides.
- When flushing and draining equipment, do not allow rinsate to enter areas where sensitive or desirable plants or their roots may become exposed.
- Side trimming desirable vegetation with this product may cause severe injury or death of the treated plants.
- Prevent spray drift from coming in contact with desirable plants.
- To avoid spills and contamination, keep containers closed when not in use.
- Refer to the "Application to Waters Used for Irrigation" section of this label prior to treating irrigation ditches or water used for crop irrigation.

Restrictions:

- Not intended for residential use.
- Do not apply this product to Christmas trees or to food crops.
- Do not make any applications of this product to flowing water that is one-half mile or less upstream of an active potable water intake.
- Do not make any applications of this product to standing water (such as lakes or reservoirs) that is one-half mile or less from an active potable water intake. See the Aquatic Applications section for specific instructions when making applications to water bodies.

Recommended Water Volumes

The spray volume used should be sufficient to create an accurate and uniform spray pattern over the area to be treated while minimizing spray drift. The spray equipment used will ultimately determine the actual minimum spray volume per acre.

Aerial Applications: Use 2 or more gallons of water per acre unless otherwise directed on this label.

Ground Applications (Broadcast): Use 5 or more gallons of water per acre unless otherwise directed on this label.

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 this label about personal protective equipment (PPE), 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 48 hours.

PPE required 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, is:

- Coveralls,
- Shoes plus socks,
- Chemical-resistant gloves made of any waterproof material,
- Protective eyewear.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR Part 170). The WPS applied when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter or allow others to enter treated areas until sprays have dried.

PRODUCT INFORMATION

GullWing is an aqueous solution that is prepared by mixing with water and a surfactant and applied by spraying. Plants readily absorb the product through both foliage and roots resulting in the stoppage of growth of treated plants shortly after application followed by yellowing of leaves (chlorosis) starting with the youngest vegetation. Tissue damage and death may not be obvious until several weeks after application and brush and trees may not indicate the full effects of the herbicide until several months after application. GullWing accumulates in the meristematic regions of a plant; it also translocates to the roots, which helps in preventing perennial species from resprouting.

This product controls many brush and vine species as well as most annual and perennial grasses and broadleaf weeds. GullWing also provides residual control of labeled weeds that germinate in the treated areas. While this product is most effective when applied post-emergence (especially for established biennial and perennial species), pre-emergence applications can be made when necessary. For maximum effect, applications should be made when the vegetation is vigorously growing. Use of a surfactant will also enhance the efficacy of this product and research indicates that use of methylated seed oils or vegetable oil concentrates may improve the efficacy of GullWing in plants under moisture and / or temperature stress; refer to the "Adjuvants" section below for specific information on using surfactants with GullWing.

Applications of GullWing are rainfast one hour after treatment.

Note Regarding Resistant Biotypes: Naturally occurring ALS/AHAS resistant biotypes of some weeds listed on this label may not be effectively controlled by GullWing. If resistant biotypes are known to exist in the area to be treated, this product should be tank mixed or applied in addition to another herbicide with a different mode of action.

PRECAUTIONS FOR AVOIDING INJURY TO NON-TARGET PLANTS

Because GullWing is absorbed by plants via their roots, desirable plants may be damaged or lost due to unintended root uptake from treated soil. To avoid injury to non-target plants, do not apply this product on or near desirable plants or to areas into which their roots may extend. Also, do not apply to soil that may be eroded or moved into contact with the roots of desirable plants.

Read and observe the directions in the Aquatic Applications section if aquatic sites are present in terrestrial noncrop areas and are part of the intended treatment area.

When applying in wet environments such as shorelines, plants with roots that may extend into the water are generally not affected by uptake of this product from the water.

Do not use vegetative matter that has been treated with this product as mulch or compost on or around desirable species.

The information that follows is general guidance for managing and minimizing off-target exposure of this product. Specific use recommendations in this label may vary from these general guidelines depending on the application method and objectives, and should supersede the general information provided below.

Spray Drift: 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 entity authorizing spraying 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:

1. The distance of the outer most operating nozzles must not exceed $\frac{3}{4}$ the length of the rotor.
2. 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.

Spray drift from applying this product may result in damage to sensitive plants adjacent to the treatment area. Only apply this product when the potential for drift to these and other adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, or non-target crops) is minimal. Do not apply when the following conditions exist that increase the likelihood of spray drift from intended targets: high or gusty winds, high temperatures, low humidity, temperature inversions.

To minimize spray drift, the applicator should be familiar with and take into account the following drift reduction advisory information. Additional information may be available from state enforcement agencies or the Cooperative Extension on the application of this product.

The best drift management strategy and most effective way to reduce drift potential are to apply large 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 recommended practice. Significant deflection from the 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. Do not use nozzles producing a mist droplet spray.

APPLICATION HEIGHT

Making applications at the lowest possible height (aircraft, ground driven spray boom) that is safe and practical 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 treatment area, the applicator must compensate for this displacement by adjusting the path of the application equipment (e.g. aircraft, ground) upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller droplets, etc.).

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type, determine drift potential at any given speed. Application should be avoided below 3 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

Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small-suspended droplets to remain in a concentrated cloud, which 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 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.

WIND EROSION

Avoid treating powdery dry or light sandy soils when conditions are favorable for wind erosion. Under these conditions, the soil surface should first be settled by rainfall or irrigation.

Managing spray drift from aerial applications: Applicators must follow these requirements to avoid off-target drift movement: 1) boom length – the distance of the outermost nozzles on the boom must not exceed $\frac{3}{4}$ the length of the wingspan or rotor, 2) nozzle orientation – nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees, and 3) application height – without compromising aircraft safety, applications should be made at a height of 10 feet or less above the crop canopy or tallest plants. Applicators must follow the most restrictive use precautions to avoid drift hazards, including those found in this labeling as well as applicable state and local regulations and ordinances.

MIXING AND APPLICATION INSTRUCTIONS

HELICOPTER SPRAY EQUIPMENT:

- Preparation:** Add the amount of GullWing in this label for the intended use to 2 – 30 gallons of water per acre, mixing thoroughly.
- Adjuvants:** To increase efficacy, a compatible nonionic surfactant may be added to the spray solution.
Except when applying with a Microfoil boom, Thru-Valve Boom™ or other similar equipment, a drift control agent may be added.
If necessary, a foam reducing agent may also be added.
- Application:** Applications should not be made under windy or gusty conditions and all possible precautions should be taken in order to minimize or eliminate spray drift. Using a controlled droplet boom and nozzle configuration is recommended to assist in mitigating spray drift.
Be sure to maintain adequate buffer zones.
- Precautions:** Because uncoated steel (except stainless steel) surfaces that experience prolonged exposure to this product may corrode and eventually fail, thoroughly clean application and mixing equipment as well as portions of the aircraft that may have been exposed to the spray (including landing gear) immediately after use by flushing with water.

GROUND OPERATED SPRAY EQUIPMENT:

- Preparation:** Add the amount of GullWing in this label for the intended use to 5 – 100 gallons of water per acre, mixing thoroughly.
- Adjuvants:** To increase efficacy, a compatible nonionic surfactant may be added to the spray solution.
Except when applying with a Microfoil boom, Thru-Valve Boom® or other similar equipment, a drift control agent may be added.
A spray pattern indicator may be added if desired.
If necessary, a foam reducing agent may also be added.
- Application:** Uniformly cover the foliage of the vegetation to be controlled with the spray solution.
Applications should not be made under windy or gusty conditions and all possible precautions should be taken in order to minimize or eliminate spray drift.
Be sure to maintain adequate buffer zones.
- Precautions:** Because uncoated steel (except stainless steel) surfaces that experience prolonged exposure to this product may corrode and eventually fail, thoroughly clean application and mixing equipment immediately after use by flushing with water.

DIRECTED FOLIAR OR SPOT SPRAY EQUIPMENT:

- Preparation:** Unless otherwise directed on this label, create a 1 – 5 percent by volume solution of GullWing in water using the table below:

SPRAY SOLUTION MIXING GUIDE

Solution Volume	Concentration			Surfactant
	1%	2.5%	5%	
1 gallon	1.3 oz.	3.25 oz.	6.5 oz.	1/3 oz.
3 gallons	3.8 oz.	9.5 oz.	1.2 pints	1 oz.
4 gallons	5.1 oz.	12.75 oz.	1.6 pints	1 1/4 oz.
5 gallons	6.5 oz.	1 pint	1 quart	1 2/3 oz.
10 gallons	13.0 oz.	1 quart	2 quarts	3 1/4 oz.
25 gallons	1 quart	2.5 quarts	1.25 gallons	8 oz.
50 gallons	2 quarts	1.25 gallons	2.5 gallons	1 pint
100 gallons	1 gallon	2.5 gallons	5 gallons	1 quart

% Solution	Amount GullWing per Gallon of Mix	Amount GullWing per 4 Gallon Backpack
0.25%	0.6 oz.	2.6 oz.
0.5%	1.3 oz.	5.1 oz.
1.0%	2.6 oz.	10.2 oz.
1.5%	3.8 oz.	15.4 oz.
2.5%	6.4 oz.	25.6 oz.

2 tablespoons = 1 fluid ounce

Adjuvants: A minimum of 1/4 percent by volume nonionic surfactant should be added to the spray solution using the last column of the above table.

A spray pattern indicator may be added if desired.

If necessary, a foam reducing agent may also be added.

Application: Uniformly cover the foliage of the vegetation to be controlled with the spray solution. For small brush, spray down on the crown to cover approximately 70% of the plant foliage. For larger brush, ensure coverage on as much of the crown as possible and spray at least two sides of the plant. Moisten, but do not drench target vegetation causing spray solution to run off.

Tips such as a 4004E or 1540E that produce an even, flat spray pattern with a spray angle of 40 degrees or less will help to produce ideal deposition on the vegetation. For a straight stream and cone pattern, adjustable cone nozzles such as the 5500 X3 or 5500 X4 may be used.

Applications should not be made under windy or gusty conditions and all possible precautions should be taken in order to minimize or eliminate spray drift.

Be sure to maintain adequate buffer zones.

Precautions: Injury may occur to desirable conifers or other plant species if applications are made directly to those plants.

Because uncoated steel (except stainless steel) surfaces that experience prolonged exposure to this product may corrode and eventually fail, thoroughly clean application and mixing equipment immediately after use by flushing with water.

ADJUVANTS

When making postemergence applications of GullWing, a spray adjuvant must be used.

10/34

NOTE: When applying to aquatic sites listed in this label, the adjuvant must be approved for aquatic uses.

Restrictions: DO NOT exceed dosage rate per acre.

DO NOT apply to the point of runoff from the treated foliage.

Nonionic Surfactants: Add at a 0.25% v/v or higher rate of the spray solution as directed by the manufacturer (NOTE: 0.25% v/v is equivalent to 1 quart in 100 gallons). Nonionic surfactants that have a HLB (hydrophilic to lipophilic balance) ratio between 12 – 17 and a formulated product consisting of at least 70% surfactant will provide the best results.

Methylated Seed Oils or Vegetable Oil Concentrates: Methylated seed oil or vegetable-based seed oil concentrate may be used in place of a surfactant, and research indicates that use of these oils may improve the efficacy of GullWing in plants under moisture and / or temperature stress. Use a rate of 1.5 to 2 pints per acre, or when using spray volumes greater than 30 gallons per acre use a rate of 1% of the total spray volume.

Silicone Based Surfactants: Silicon-based surfactants may cause greater spreading of droplets on the leaf surface than conventional nonionic surfactants, but may also dry more quickly limiting herbicide uptake. These surfactants should be used at the rates specified in the manufacturer's label.

Invert Emulsions: GullWing can be applied as an invert (water-in-oil) spray emulsion that will minimize spray drift and spray run-off. The invert spray emulsion may be batch mixed or injected (in-line mixing); consult the label of the invert chemical for instructions on mixing.

Fertilizer/Surfactant Blends: Nitrogen based liquid fertilizers may be used in combination with nonionic, methylated seed oil or vegetable oil concentrate surfactants. Tank mixing fertilizers without a surfactant is not recommended. Apply at a rate of 2 – 3 pints per acre.

If desired, other adjuvants such as spray pattern indicators or additives for reducing foaming or spray drift may be added to the mix. See the label(s) of the respective product(s) for specific instructions and application rates.

11/34

WEEDS CONTROLLED

GullWing controls the following weeds. Use the rates listed below for preemergence or postemergence control, as well as residual control of both annuals and perennials. For heavy or well established infestations, use the higher rates listed. These tables are based on broadcast treatments and in general, when making low-volume applications use the lower rates listed.

GRASSES			
		Life	Application Rate
Common Name	Scientific Name	Cycle	(Pints / Acre)
Annual Bluegrass	<i>Poa annua</i>	A	2.0 - 3.0
Bahiagrass	<i>Paspalum notatum</i>	P	4.0 - 6.0
Barnyardgrass [†]	<i>Echinochloa crus-gali</i>	A	3.0 - 4.0
Beardgrass	<i>Andropogon</i> spp.	P	3.0 - 4.0
Bermudagrass [†]	<i>Cynodon dactylon</i>	P	4.0 - 6.0
Big bluestem	<i>Andropogon gerardii</i>	P	4.0 - 6.0
Bluegrass, Annual [†]	<i>Poa annua</i>	A	3.0 - 4.0
Broadleaf signalgrass	<i>Brachiaria platyphylla</i>	A	2.0 - 3.0
Bulrush	<i>Scirpus validus</i>	P	3.0 - 4.0
Canada bluegrass	<i>Poa compressa</i>	P	2.0 - 3.0
Cattail	<i>Typha</i> spp.	P	4.0 - 6.0
Cheat	<i>Bromus secalinus</i>	A	3.0 - 4.0
Cogongrass	<i>Imperata cylindrica</i>	P	4.0 - 6.0
Crabgrass	<i>Digitaria</i> spp.	A	3.0 - 4.0
Crowfootgrass [†]	<i>Dactyloctenium aegyptium</i>	A	3.0 - 4.0
Dallisgrass	<i>Paspalum dilatatum</i>	P	4.0 - 6.0
Downy brome	<i>Bromus tectorum</i>	A	2.0 - 3.0
Fall panicum	<i>Panicum dichotomiflorum</i>	A	3.0 - 4.0
Feathertop	<i>Pennisetum villosum</i>	P	4.0 - 6.0
Fescue	<i>Festuca</i> spp.	A/P	2.0 - 3.0
Foxtail	<i>Setaria</i> spp.	A	2.0 - 3.0
Giant Reed	<i>Arundo donax</i>	A	3.0 - 4.0
Goosegrass	<i>Eleusine indica</i>	A	3.0 - 4.0
Guineagrass	<i>Panicum maximum</i>	P	4.0 - 6.0
Italian ryegrass	<i>Lolium multiflorum</i>	A	2.0 - 3.0
Itchgrass [†]	<i>Rottboellia exaltata</i>	A	3.0 - 4.0
Johnsongrass	<i>Sorghum halepense</i>	P	2.0 - 3.0
Junglerice [†]	<i>Echinochloa colonum</i>	A	3.0 - 4.0
Kentucky bluegrass	<i>Poa pratensis</i>	P	2.0 - 3.0
Lovegrass	<i>Eragrostis</i> spp.	A/P	2.0 - 3.0
Lovegrass [†]	<i>Eragrostis</i> spp.	A	3.0 - 4.0
Maidencane	<i>Panicum hemitomon</i>	A	3.0 - 4.0
Napier grass	<i>Pennisetum purpureum</i>	P	2.0 - 3.0
Orchardgrass	<i>Dactylis glomerata</i>	P	2.0 - 3.0
Panicum, Browntop [†]	<i>Panicum fasciculatum</i>	A	3.0 - 4.0
Panicum Texas [†]	<i>Panicum texanum</i>	A	3.0 - 4.0
Paragrass	<i>Brachiaria mutica</i>	P	2.0 - 3.0

12/34

Draft GullWing Label
June 17, 2011
Revision 4

GRASSES			
		Life	Application Rate
Common Name	Scientific Name	Cycle	(Pints / Acre)
Phragmites	<i>Phragmites australis</i>	P	4.0 - 6.0
Prairie cordgrass	<i>Spartina pectinata</i>	P	4.0 - 6.0
Prairie threeawn	<i>Aristida oligantha</i>	P	3.0 - 4.0
Quackgrass	<i>Agropyron repens</i>	P	2.0 - 3.0
Reed canarygrass	<i>Phalaris arundinacea</i>	P	3.0 - 4.0
Saltgrass [†]	<i>Distichlis stricta</i>	P	4.0 - 6.0
Sand dropseed	<i>Sporobolus cryptandrus</i>	A	2.0 - 3.0
Sand dropseed	<i>Sporobolus cryptandrus</i>	P	4.0 - 6.0
Sandbur	<i>Cenchrus</i> spp.	A	2.0 - 3.0
Sandbur, Field [†]	<i>Cenchrus incertus</i>	A	3.0 - 4.0
Signalgrass [†]	<i>Brachiaria platyphylla</i>	A	3.0 - 4.0
Smooth brome	<i>Bromus inermis</i>	P	2.0 - 3.0
Sprangletop [†]	<i>Leptochloa</i> spp.	A	4.0 - 6.0
Timothy	<i>Phleum pretense</i>	P	4.0 - 6.0
Torpedograss	<i>Panicum repens</i>	P	3.0 - 4.0
Vaseygrass	<i>Paspalum urvillei</i>	P	2.0 - 3.0
Wild barley	<i>Hordeum</i> spp.	A	3.0 - 4.0
Wild oats	<i>Avena fatua</i>	A	2.0 - 3.0
Wirestem muhly	<i>Muhlenbergia frondosa</i>	P	4.0 - 6.0
Witchgrass	<i>Panicum capillare</i>	A	2.0 - 3.0
Wooly Cupgrass [†]	<i>Eriochloa villosa</i>	A	3.0 - 4.0

BROADLEAF WEEDS			
		Life	Application Rate
Common Name	Scientific Name	Cycle	(Pints / Acre)
Alligatorweed	<i>Alternanthera philoxeroides</i>	A/P	2.0 - 3.0
Arrowhead	<i>Pluchea sericea</i>	A	4.0 - 6.0
Broom snakeweed ²	<i>Gutierrezia sarothrae</i>	P	3.0 - 4.0
Bull thistle	<i>Cirsium vulgare</i>	B	3.0 - 4.0
Burclover [†]	<i>Medicago</i> spp.	A	3.0 - 4.0
Burdock	<i>Arctium</i> spp.	B	2.0 - 3.0
Camphorweed	<i>Heterotheca subaxillaris</i>	P	2.0 - 3.0
Canada thistle	<i>Cirsium arvense</i>	P	4.0 - 6.0
Carolina geranium	<i>Geranium carolinianum</i>	A	2.0 - 3.0
Carpetweed	<i>Mollugo verticillata</i>	A	2.0 - 3.0
Chickweed, Mouseear ¹	<i>Cerastium vulgatum</i>	A	3.0 - 4.0
Clover	<i>Trifolium</i> spp.	A/P	2.0 - 3.0
Clover, Hop [†]	<i>Trifolium procumbens</i>	A	3.0 - 4.0
Cocklebur	<i>Xanthium strumarium</i>	A	3.0 - 4.0
Common chickweed	<i>Stellaria media</i>	A	2.0 - 3.0
Common ragweed	<i>Ambrosia artemisiifolia</i>	A	2.0 - 3.0
Cudweed [†]	<i>Gnaphalium</i> spp.	A	3.0 - 4.0

13/34

Draft GullWing Label
June 17, 2011
Revision 4

BROADLEAF WEEDS		Life	Application Rate
Common Name	Scientific Name	Cycle	(Pints / Acre)
Dandelion	<i>Taraxacum officinale</i>	P	2.0 - 3.0
Desert Camelthorn	<i>Alhagi pseudalhagi</i>	P	3.0 - 4.0
Diffuse knapweed	<i>Centaurea diffusa</i>	A	3.0 - 4.0
Dock	<i>Rumex</i> spp.	P	3.0 - 4.0
Dogfennel	<i>Eupatorium capillifolium</i>	A	2.0 - 3.0
Fiddleneck [†]	<i>Amsinckia intermedia</i>	A	3.0 - 4.0
Filaree	<i>Erodium</i> spp.	A	2.0 - 3.0
Fleabane	<i>Erigeron</i> spp.	A	2.0 - 3.0
Giant ragweed	<i>Ambrosia trifida</i>	A	4.0 - 6.0
Goldenrod	<i>Solidago</i> spp.	P	3.0 - 4.0
Grey rabbitbrush	<i>Chrysothamnus nauseosus</i>	P	4.0 - 6.0
Henbit [†]	<i>Lamium aplexicaule</i>	A	3.0 - 4.0
Hoary vervain	<i>Verbena stricta</i>	P	2.0 - 3.0
Horseweed	<i>Conyza canadensis</i>	A	2.0 - 3.0
Indian mustard	<i>Brassica juncea</i>	A	2.0 - 3.0
Japanese bamboo/knotweed	<i>Polygonum cuspidatum</i>	P	4.0 - 6.0
Knotweed, prostrate [†]	<i>Polygonum aviculare</i>	A/P	3.0 - 4.0
Kochia ¹	<i>Kochia scoparia</i>	A	2.0 - 3.0
Lambsquarters	<i>Chenopodium album</i>	A	2.0 - 3.0
Lespedeza	<i>Lespedeza</i> spp.	P	2.0 - 3.0
Little mallow	<i>Malva parviflora</i>	B	4.0 - 6.0
Milkweed	<i>Asclepias</i> spp.	P	4.0 - 6.0
Miners lettuce	<i>Montia perfoliata</i>	A	2.0 - 3.0
Mullein	<i>Verbascum</i> spp.	B	2.0 - 3.0
Nettleleaf goosefoot	<i>Chenopodium murale</i>	A	2.0 - 3.0
Oxeye daisy	<i>Chrysanthemum leucanthemum</i>	P	2.0 - 3.0
Pepperweed	<i>Lepidium</i> spp.	A	2.0 - 3.0
Pigweed	<i>Amaranthus</i> spp.	A	2.0 - 3.0
Plantain	<i>Plantago</i> spp.	P	2.0 - 3.0
Pokeweed	<i>Phytolacca Americana</i>	P	3.0 - 4.0
Primrose	<i>Oenothera kunthiana</i>	P	4.0 - 6.0
Puncturevine	<i>Tribulus terrestris</i>	A	2.0 - 3.0
Purple loosestrife ²	<i>Lythrum salicaria</i>	P	3.0 - 4.0
Purslane	<i>Portulaca</i> spp.	A	3.0 - 4.0
Pusley, Florida [†]	<i>Richardia scabra</i>	A	3.0 - 4.0
Rocket, London [†]	<i>Sisymbrium irio</i>	A	3.0 - 4.0
Rush skeletonweed ²	<i>Chondrilla juncea</i>	B	3.0 - 4.0
Russian knapweed	<i>Centaurea repens</i>	P	4.0 - 6.0
Russian thistle	<i>Salsola kali</i>	A	2.0 - 3.0
Saltbush	<i>Atriplex</i> spp.	A	3.0 - 4.0
Shepherd's-purse [†]	<i>Capsella bursa-pastoris</i>	A	3.0 - 4.0
Silverleaf nightshade	<i>Solanum elaeagnifolium</i>	P	4.0 - 6.0
Smartweed	<i>Polygonum</i> spp.	A/P	2.0 - 3.0

14/34

Draft GullWing Label
June 17, 2011
Revision 4

BROADLEAF WEEDS			
Common Name	Scientific Name	Life Cycle	Application Rate (Pints / Acre)
Sorrell	<i>Rumex</i> spp.	P	2.0 - 3.0
Sowthistle	<i>Sonchus</i> spp.	A	4.0 - 6.0
Spurge, Annual [†]	<i>Euphorbia</i> spp.	A	3.0 - 4.0
Stinging nettle ²	<i>Urtica dioica</i>	P	3.0 - 4.0
Sunflower	<i>Helianthus</i> spp.	A/B	2.0 - 3.0
Sweet clover	<i>Melilotus</i> spp.	A/B	2.0 - 3.0
Tansymustard	<i>Descurainia pinnate</i>	A	2.0 - 3.0
Texas thistle	<i>Cirsium texanum</i>	P	4.0 - 6.0
Velvetleaf [†]	<i>Abutilon theophrasti</i>	A	3.0 - 4.0
Western ragweed	<i>Ambrosia psilostachya</i>	P	2.0 - 3.0
Wild carrot	<i>Daucus carota</i>	B	2.0 - 3.0
Wild lettuce	<i>Lactuca</i> spp.	A/B	2.0 - 3.0
Wild parsnip	<i>Pastinaca sativa</i>	B	2.0 - 3.0
Wild turnip	<i>Brassica campestris</i>	B	2.0 - 3.0
Woollyleaf bursage	<i>Franseria tomentosa</i>	P	2.0 - 3.0
Yellow starthistle	<i>Centaurea solstitialis</i>	A	3.0 - 4.0
Yellow woodsorrel	<i>Oxalis stricta</i>	P	2.0 - 3.0

VINES AND BRAMBLES			
Common Name	Scientific Name	Life Cycle	Application Rate (Pints / Acre)
Blackberry ⁷	<i>Rubus</i> spp.	P	4.0 - 6.0
Dewberry ⁷	<i>Rubus</i> spp.	P	4.0 - 6.0
Field bindweed	<i>Convolvulus arvensis</i>	P	1.0
Greenbriar	<i>Smilax</i> spp.	P	3.0 - 4.0
Hedge bindweed	<i>Calystegia sepium</i>	A	1.0
Honeysuckle	<i>Lonicera</i> spp.	P	3.0 - 4.0
Kudzu [†]	<i>Pueraria lobata</i>	P	4.0 - 6.0
Morningglory	<i>Ipomoea</i> spp.	A/P	3.0 - 4.0
Poison ivy	<i>Rhus radicans</i>	P	3.0 - 4.0
Redvine	<i>Brunnichia cirrhosa</i>	P	3.0 - 4.0
Trumpet creeper	<i>Campsis radicans</i>	P	4.0 - 6.0
Virginia creeper	<i>Parthenocissus quinquefolia</i>	P	4.0 - 6.0
Wild buckwheat	<i>Polygonum convolvulus</i>	P	2.0 - 3.0
Wild grape	<i>Vitis</i> spp.	P	4.0 - 6.0
Wild rose	<i>Rosa</i> spp.	P	3.0 - 4.0

BRUSH			
		Life	Application Rate
Common Name	Scientific Name	Cycle	(Pints / Acre)
Black Locust ³	<i>Robinia pseudoacacia</i>	P	4.0 - 6.0
Blackgum	<i>Nyssa sylvatica</i>	P	4.0 - 6.0
Boxelder	<i>Acer negundo</i>	P	4.0 - 6.0
Brazilian peppertree	<i>Schinus terebinthifolius</i>	P	4.0 - 6.0
Cherry	<i>Prunus</i> spp.	P	4.0 - 6.0
Chinaberry	<i>Melia azadarach</i>	P	4.0 - 6.0
Chinese tallow-tree	<i>Sapium sebiferum</i>	P	4.0 - 6.0
Dogwood	<i>Cornus</i> spp.	P	4.0 - 6.0
Elm ⁴	<i>Ulmus</i> spp.	P	4.0 - 6.0
Hawthorn	<i>Crataegus</i> spp.	P	4.0 - 6.0
Hickory	<i>Carya</i> spp.	P	4.0 - 6.0
Honeylocust ⁵	<i>Gleditsia triacanthos</i>	P	4.0 - 6.0
Maple	<i>Acer</i> spp.	P	4.0 - 6.0
Melaleuca	<i>Melaleuca quiquenervia</i>	P	4.0 - 6.0
Mulberry	<i>Morus</i> spp.	P	4.0 - 6.0
Oak	<i>Quercus</i> spp.	P	4.0 - 6.0
Persimmon	<i>Diospyros virginiana</i>	P	4.0 - 6.0
Pine ⁶	<i>Pinus</i> spp.	P	4.0 - 6.0
Poplar	<i>Populus</i> spp.	P	4.0 - 6.0
Privet	<i>Ligustrum vulgare</i>	P	4.0 - 6.0
Red Alder	<i>Alnus rubra</i>	P	4.0 - 6.0
Red Maple	<i>Acer rubrum</i>	P	4.0 - 6.0
Rubber rabbitbrush	<i>Chrysothamnus nauseosus</i>	P	4.0 - 6.0
Russian Olive	<i>Eleagnus angustifolia</i>	P	4.0 - 6.0
Saltcedar	<i>Tamarix ramosissima</i>	P	4.0 - 6.0
Sassafras	<i>Sassafras albidum</i>	P	4.0 - 6.0
Sourwood	<i>Oxydendrum arboreum</i>	P	4.0 - 6.0
Sumac	<i>Rhus</i> spp.	P	4.0 - 6.0
Sweetgum	<i>Liquidambar styraciflua</i>	P	4.0 - 6.0
Water willow	<i>Justica americana</i>	P	4.0 - 6.0
Willow	<i>Salix</i> spp.	P	4.0 - 6.0
Yellow poplar	<i>Liriodendron tulipifera</i>	P	4.0 - 6.0

[†] For preemergence control, tank-mix with Pendulum®

[‡] Use a minimum of 75 GPA – Control of established stands may require repeat applications.

¹ For preemergence control, tank mix with Pendulum® or Karmex®.

² For best results, early postemergence applications are required.

³ Tank-mix with Roundup®, Accord®, Escort®, Krenite®, Garlon® 3A, or Tordon® K.

⁴ Tank-mix with Roundup®, Accord® or Escort®.

⁵ Tank-mix with Roundup®, Accord®, Garlon® 3A, or Tordon® K.

⁶ Tank-mix with Roundup®, Accord®, Krenite®, Garlon® 3A, or Tordon® K.

⁷ The degree of control is species dependent; some Rubus species may not be completely controlled.

NONCROP SITES

USE INFORMATION

NOTE: *DO NOT* make applications of this product by fixed wing aircraft *except* for aerial applications for brush control. Refer to the BRUSH CONTROL section of this label for more information.

Refer to the WEEDS CONTROLLED section of this label for a list of species controlled by GullWing. In addition to the species listed in the WEEDS CONTROLLED section, this product will also control the following woody brush and trees:

Common Name	Scientific Name	Common Name	Scientific Name
Alder	<i>Alnus</i> spp.	<i>Lyonia</i> spp.	
Aspen	<i>Populus</i> spp.	Including:	Fetterbush (<i>Lyonia lucida</i>)
Australian pine ³	<i>Casuarina equisetifolia</i>		Staggerbush (<i>Lyonia mariana</i>)
Autumn olive	<i>Elaeagnus umbellata</i>	Madrone	<i>Arbutus menziesii</i>
Birch ¹	<i>Betula</i> spp.	Manzanita, greenleaf ²	<i>Arctostaphylos patula</i>
Black oak	<i>Quercus kelloggii</i>	Poison oak	<i>Rhus diversiloba</i>
Ceanothis	<i>Ceanothis</i> spp.	Popcorn-tree	<i>Sapium sebiferum</i>
Chinquapin ²	<i>Castanopsis chrysophylla</i>	Scotch broom ³	<i>Cytisus scoparius</i>
Cottonwood	<i>Populus</i> spp.	Sweetbay magnolia ^{2,3}	<i>Magnolia virginiana</i>
Cypress	<i>Taxodium</i> spp.	Sycamore	<i>Platanus occidentalis</i>
Elderberry ³	<i>Sambucus</i> spp.	Tanoak ^{1,2,3}	<i>Lithocarpus densiflorus</i>
Eucalyptus	<i>Eucalyptus</i> spp.	TiTi ^{1,2}	<i>Cyrilla racemiflora</i>
Hazel ³	<i>Corylus cornuta</i>	Tree of heaven ³	<i>Ailanthus altissima</i>
Holly ^{1,2}		<i>Vaccinium</i> spp.	
Including:	Gallberry (<i>Ilex glabra</i>) ^{2,3}	Including:	Blueberry (<i>Vaccinium</i> spp.)
	Tall gallberry (<i>Ilex coriacea</i>) ²		Sparkleberry (<i>Vaccinium arboretum</i>)
	Yaupon (<i>Ilex vomitoria</i>) ²	Waxmyrtle ^{2,3}	<i>Myrica californica</i>
Huckleberry	<i>Gaylussacia</i> spp.		<i>Myrica cerifera</i>

¹ Use the higher label rates for this species.

² An oil emulsion carrier is recommended for this species.

³ Tank mix with Garlon® 4 as a basal or stump treatment.

APPLICATION NOTES FOR WET SITES

Except in the states of California and New York, GullWing can be applied to the following use sites:

With temporary surface water present:

- Areas between planting beds that have collected water
- Equipment ruts
- Depressions created by forest management activities

With no temporary surface water present:

- Drainage ditches
- Intermittent drainage
- Intermittently flooded low lying areas
- Seasonally dry flood plains
- Transitional areas between upland and lowland sites
- Marshes, swamps and bogs
- Seasonally dry flood deltas

NOTE: Only the edges of drainage ditches may be treated when water is present.

STUMP AND CUT STEM TREATMENTS

Undesirable woody vegetation may be controlled by applying GullWing to the cambium of freshly cut stump surfaces using either a dilute solution or concentrate, or to cuts on the stems of target woody vegetation using a dilute solution. Concentrated solutions require fewer cuts on the stem while still remaining effective. For best results, stump and cut stem treatments should be done in summer and early fall and are least effective in the spring.

NOTE: Desirable woody plants may be injured or killed if they are grafted to the root system of the treated tree or they extend from the same root system as the treated tree.

APPLICATION WITH DILUTE SOLUTIONS

- Preparation:** Add 8-12 fluid ounces of GullWing to one gallon of water, mixing thoroughly.
- Adjuvants:** To prevent freezing when applying in cold conditions, ethylene glycol antifreeze may be added according to the manufacturer's instructions.
- A surfactant or penetrating agent may be used to improve uptake of the herbicide through cambiums that have become partially callused.
- Application:** Cut Stump Treatments – Cut the stump surface and then brush or spray the solution onto the exposed cambium in the cuts, making sure to thoroughly wet the entire cambium area.
- Tree Injection Treatments – Making sure the injector completely penetrates the bark at each injection site, apply 1 milliliter of solution at each site. Use a one inch or smaller interval between injection sites completely around the trunk of the tree.
- Frill or Girdle Treatments: Make cuts through the bark at no more than two inch intervals around the tree using a hatchet, machete, or similar device. Spray or brush the solution into each cut until thoroughly wet.

APPLICATION WITH CONCENTRATED SOLUTIONS

- Preparation:** Use 2 quarts of GullWing with no more than 1 quart of water by volume for concentrated solution applications.
- Adjuvants:** To prevent freezing when applying in cold conditions, ethylene glycol antifreeze may be added according to the manufacturer's instructions.
- A surfactant or penetrating agent may be used to improve uptake of the herbicide through cambiums that have become partially callused.
- Application:** Tree Injection Treatments – Making sure the injector completely penetrates the bark at each injection site, apply 1 milliliter of solution at each site. For best results, make one injection for every three inches of tree diameter at breast height (DBH) spacing the injections equally around the trunk.
- Frill or Girdle Treatments: Make cuts through the bark at no more than two inch intervals around the tree using a hatchet, machete, or similar device. Spray or brush the solution into each cut until thoroughly wet.
- Hack and Squirt Treatments: At equal intervals around the tree, make a downward-angled cut completely through the bark and cambium for every three inches of DBH using a hatchet or similar device. Then apply 1 milliliter of solution to each cut using a squirt bottle, syringe, or similar device, making sure that the solution does not run out of the cut.

**THINLINE BASAL AND STEM APPLICATIONS and
LOW VOLUME BASAL BARK TREATMENTS**

Applications of GullWing will control susceptible species such as big leaf maple (*Acer macrophyllum*), willow (*Salix* spp.) and Eucalyptus (*Eucalyptus* spp.) with stem diameters of 4 inches or less. Application sites containing high stem densities and multiple, small (1/2 inch diameter or less) stems should be foliar treated with low volume backpack or fixed boom applications. See BRUSH CONTROL/GROUND APPLICATIONS/Low Volume section of this label.

THINLINE BASAL AND STEM APPLICATIONS

Use thinline basal and stem applications for susceptible woody species with a stem ground line diameter of 3 inches or less. For larger diameter stems, use the low volume basal bark treatment below.

- Preparation: Mix 1.5-3.0 pints of GullWing in one gallon of diesel oil or penetrating oil, stirring frequently to maintain a uniform mixture.
- Application: Direct a thin line of the spray solution to the stems beginning a few feet from the ground and descending toward the base of the tree making a zigzag motion.
- Precautions: Injury may occur to desirable conifers or other plant species if applications are made directly to those plants.
- Restrictions: Do not over apply to the point of runoff resulting in puddling.

LOW VOLUME BASAL BARK TREATMENTS

Use low volume basal bark treatments on stems up to 4 inches in diameter at breast height (DBH). GullWing may be tank mixed with Garlon™ 4 or other basal products to broaden the spectrum of control. To prevent stump resprouting with small (1/2 inch diameter) stems, avoid application on sites that have been mowed prior to application.

- Preparation: Mix 8–16 oz. of GullWing in one gallon of diesel oil or penetrating oil, stirring frequently to maintain a uniform mixture.
- Tank Mixes: To control black locust, honey locust, hackberry, elms and other species listed on manufacturer's labels, use 1.5 - 2.5% GullWing mixed with 15 to 20% Garlon® 4. A tank mix of 1.5% GullWing and Garlon® 4 is effective in the Northeastern U.S. Use the higher rate (2.5%) of GullWing in areas containing sassafras, oak, hickory, cherry, and maples or in the southern portion of the U.S.
- Application: Spray the lower 12 – 18 inches of the stem with the mixture (including the root-collar area) until wet.
- Precautions: Injury may occur to desirable conifers or other plant species if applications are made directly to those plants.
- Restrictions: DO NOT over apply to the point of dripping or puddling.

BRUSH CONTROL

When mixed with water and a surfactant, GullWing may be applied as a spray solution for brush control in the following sites:

utility plant sites	railroad, utility, pipeline and highway rights-of-way
pumping stations	petroleum tank farms
storage areas	fence rows
	non-irrigation ditchbanks

GullWing may be applied to non-grazed or hayed areas within these sites, and may also be used to control brush in wildlife openings.

AERIAL APPLICATIONS:

NOTE: Aerial applications for brush control may be made by fixed wing aircraft. Be sure to read and follow the precautions below when using fixed wing aircraft.

Preparation: Add the amount of GullWing in this label for the intended use to 5 – 30 gallons of water per acre, mixing thoroughly.

Adjuvants: To increase efficacy, a compatible nonionic surfactant or methylated seed oil should be added to the spray solution. See the Adjuvant section above for specific recommendations.

Except when applying with a Microfoil boom, Thru-Valve Boom® or other similar equipment, a drift control agent may be added.

If necessary, a foam reducing agent may also be added.

Application: Applications should not be made under windy or gusty conditions and all possible precautions should be taken in order to minimize or eliminate spray drift, refer to the Spray Drift section at the beginning of this label for more information. A calibrated controlled droplet boom and nozzle configuration is recommended to assist in mitigating spray drift.

Be sure to maintain adequate buffer zones.

Precautions:

Because uncoated steel (except stainless steel) surfaces that experience prolonged exposure to this product may corrode and eventually fail, thoroughly clean application and mixing equipment as well as portions of the aircraft that may have been exposed to the spray (including landing gear) immediately after use by flushing with water.

Side trimming is not recommended with GullWing unless death of treated tree can be tolerated.

Restrictions: DO NOT make applications by fixed wing aircraft unless appropriate buffer zones can be maintained to prevent spray drift out of the target area or, when treating open tracts of land, spray drift as a result of fixed wing aircraft application can be tolerated.

GROUND APPLICATIONS:

See the instructions under **Ground Operated Spray Equipment in the Mixing and General Application Instructions** section at the beginning of this label.

Specific Instructions for Ground Applications:

Preparation: Use 1.0 – 3.0 pints of GullWing in recommended tank mixtures when the roots of desirable trees may extend into rights-of-way corridors. Desirable trees may be damaged or die when their roots extend into treated zones and more than 3 pints per acre is applied.

Tank Mixes: To control black locust, honey locust, hackberry, elms and other species listed on manufacturer's labels, use a tank mix of 1.5 - 2.5% GullWing with 15 - 20% Garlon® 4 in basal oil. Use the higher rate of GullWing in areas containing sassafras, oak, hickory, cherry, and maples or in the southern 2/3's of the U.S. The lower rates listed will be effective in the Northeastern U.S.

SPRAY SOLUTION MIXING GUIDE FOR LOW VOLUME FOLIAR APPLICATIONS				
SPRAY SOLUTION VOLUME	DESIRED CONCENTRATION (fluid volume)			
	GullWing		Garlon® 4	
	1.5%	2.5%	15%	20%
1 gallon	1.9 oz.	3.2 oz.	19.2 oz.	25.6 oz.
3 gallons	5.7 oz.	9.6 oz.	57.6 oz.	76.8 oz.
4 gallons	7.7 oz.	12.8 oz.	76.8 oz.	102.4 oz.
5 gallons	9.6 oz.	16.0 oz.	96.0 oz.	1.0 gallon
50 gallons	0.75 gallons	1.25 gallons	7.5 gallons	10.0 gallons
100 gallons	1.5 gallons	2.5 gallons	15.0 gallons	20.0 gallons

Restrictions: DO NOT side trim with GullWing unless severe injury or death of the treated tree can be tolerated. GullWing is readily translocated and can result in death of the entire tree.

Specific Instructions for Low Volume Applications:

See the instructions under **Directed Foliar or Spot Spray Equipment in the Mixing and General Application Instructions** section at the beginning of this label.

Preparation: To prepare the spray solution, thoroughly mix in water 0.5% to 5.0% GullWing plus surfactant (See the ADJUVANT section above for specific recommendations).

For difficult to control brush species, use the higher concentrations of herbicide and/or spray volumes. Consult the WEEDS CONTROLLED section above for specific recommendations.

For improved control, GullWing may be tank mixed with other products, consult the Suggested Tank-Mixes and Application Rates table below.

Adjuvants: If necessary, a foam reducing agent may also be added.

Application: Use equipment calibrated to deliver 5 to 20 gallons of spray solution per acre.

When applying to brush up to 4 feet tall, spray down on the crown covering the crown and penetrating approximately 70% of the plant.

When applying to brush 4 - 8 feet tall, apply to at least two sides of the plant by spraying the plant in smooth vertical motions from the crown to the bottom. For best results, be sure to cover the crown of the plant.

When applying to brush over 8 feet tall, spray at least two sides of the brush using a smooth zigzag pattern from crown to bottom.

When making a broadcast application, spray the crown in a manner that simulates a gentle rain, allowing the spray to penetrate the target foliage but without falling to the understory. Severe injury or death of plants in the understory may result from contact with the spray solution.

Precautions:

Excessive wetting of foliage is not recommended.

Restrictions: DO NOT apply more than 6 pints of GullWing per acre,

DO NOT side trim with GullWing unless severe injury or death of the treated tree can be tolerated. GullWing is readily translocated and can result in death of the entire tree.

SUGGESTED LOW-VOLUME TANK-MIXES AND APPLICATION RATES

Target Vegetation	Rate of GullWing	Tank Mix
Mixed hardwoods without elm, locust, or pine	1.0-1.5% by volume	Surfactant
Mixed hardwoods containing elm, locust, and pine	0.5-1.0% by volume	Accord® at 2-3% by volume plus surfactant
Mixed hardwoods with locust and pine but no elm	0.5-1.0% by volume	Krenite® at 2-5% by volume plus surfactant
Mixed hardwoods with locust and elm but no pine	0.5-1.0% by volume	Escort® at 2 oz./Acre or 2.3 grams/gal. plus surfactant

NOTE: GullWing has been found to be LESS effective in tank mixes with 2,4-D or products containing 2,4-D.

Specific Instructions for High Volume Applications:

See the instructions under Ground Operated Spray Equipment in the Mixing and General Application Instructions section at the beginning of this label.

Preparation: Mix 2 – 6 pints of GullWing per acre in water and add a surfactant (see ADJUVANT section of this label for specific recommendations and rates of surfactants).

For difficult to control brush species, use the higher concentrations of herbicide and/or spray volumes. Consult the WEEDS CONTROLLED section above for specific recommendations.

Adjuvants: If necessary, a foam reducing agent may also be added.

Tank Mixes: To provide control of species tolerant to GullWing, tank mixes with Accord®, Roundup®, Krenite®, Escort®, Telar®, Tordon® K, Garlon® 3A, Banvel® and Vanquish® may be used.

NOTE: GullWing has been found to be LESS effective in tank mixes with 2,4-D or products containing 2,4-D.

Application: For best results on medium to high density brush, use equipment calibrated to deliver up to 100 gallons of spray solution per acre (GPA).

Spray the foliage of the vegetation to be controlled in a uniform manner being sure NOT to apply to the point of run-off.

Precautions: Excessive wetting of foliage is not recommended.

Restrictions: DO NOT apply more than 6 pints of GullWing per acre.

DO NOT side trim with GullWing unless severe injury or death of the treated tree can be tolerated. GullWing is readily translocated and can result in death of the entire tree.

INVERT EMULSIONS:

In order to minimize spray drift and run-off, GullWing may be applied as an invert emulsion carrier when making applications to brush. The spray emulsion may be batch-mixed in a single tank or injected (in-line mixing). For mixing directions, refer to the invert chemical label.

CONTROL OF WEEDS UNDER PAVED SURFACES

In industrial sites or where pavement has a barrier along the perimeter that prevents roots of desirable plants from encroaching into application areas, GullWing may be used under asphalt, pond liners and other paved areas to control weeds.

This product is NOT recommended for use under paved areas such as driveways or parking lots on residential properties, nor in recreational areas such as under bike or jogging paths, golf cart paths, tennis courts, or anywhere landscape plantings might occur in the future. Desirable plants may be injured or killed if this product is applied where their roots are present, and the roots of trees and shrubs may extend beyond the drip line of the plant (the outer edges of the branch extremities).

Preparation: Mix in a tank using a rate of 6 pints (2.2 fl. oz. per 1,000 ft.²) of GullWing to at least 100 gallons of water per acre. Create sufficient spray solution to ensure complete and uniform coverage of the entire area to be paved, including shoulder areas.

Application: Use equipment calibrated to deliver at least 100 gallons of spray solution per acre (GPA).

GullWing may need to be incorporated into the soil if the soil is not moist prior to application in order to activate the herbicide. Incorporation may be accomplished by using a rototiller or disc to a depth of 4 – 6 inches, or 1 inch of irrigation may be used. *If irrigating, do not allow treated soil to wash or move into untreated areas.*

Precautions: GullWing application sites should be paved over as soon as possible after application.

All tubers, rhizomes, stolons and other vegetative plant parts that are present in the site should be scalped to a depth that assures their removal using a grader blade or similar technique.

Applications should be made to the soil surface only when final grade is established. Do not move soil following GullWing application.

Restrictions: DO NOT apply where the chemical may contact the roots of desirable trees or other plants.

DO NOT apply more than 6 pints of GullWing per acre,

CONTROL OF UNDESIRABLE WEEDS IN UNIMPROVED BERMUDAGRASS AND BAHIAGRASS

GullWing may be used in non-cropland industrial sites, roadsides and utility rights-of-way to release unimproved bahiagrass and bermudagrass from competition with broadleaf weeds and grasses listed in the WEEDS CONTROLLED section above. GullWing applications to bermudagrass will cause seedhead inhibition and a compacted growth habit.

WEEDS CONTROLLED

Common Name	Scientific Name
Bedstraw	<i>Galium</i> spp.
Bishopweed	<i>Ptilimnium capillaceum</i>
Buttercup	<i>Ranunculus parviflorus</i>
Carolina geranium	<i>Geranium carolinianum</i>
Fescue	<i>Festuca</i> spp.
Foxtail	<i>Setaria</i> spp.
Little barley	<i>Hordeum pusillum</i>
Seedling Johnsongrass	<i>Sorghum halepense</i>
Wild carrot	<i>Daucus carota</i>
White clover	<i>Trifolium repens</i>
Yellow woodsorrel	<i>Oxalis stricta</i>

Preparation: Bermudagrass – Mix 6-12 oz. of GullWing per acre when grass is dormant, or 3-4 oz. per acre once the grass has reached full green-up. A surfactant should be used in the spray solution, but should NOT be used at a rate higher than 1 oz. / 25 gallons of spray solution.

Bahiagrass – Mix 4-8 oz. of GullWing per acre when grass is dormant or after the grass has initiated green-up but has not exceeded 25% green-up. A surfactant should be used in the spray solution (refer to the ADJUVANT section of this label for specific recommendations on surfactants).

Tank Mixes: Pendulum® herbicide may be added at the rate of 3.3-6.6 lbs. per acre for additional pre-emergence control of annual grasses and small seeded broadleaf weeds. Refer to the Pendulum® herbicide label for weeds controlled and other use directions and precautions.

To control johnsongrass in bermudagrass turf, use 8 oz. of GullWing with 12 oz. of Roundup® per acre and a surfactant.

For additional control of broadleaves and vines, 1-2 pints of Garlon® 3A per acre may be added to the GullWing / Roundup® mix described above.

Be sure to follow the most restrictive instructions from all labels used in tank mixes.

NOTE: GullWing has been found to be LESS effective in tank mixes with 2,4-D or products containing 2,4-D.

Application: Uniformly apply with properly calibrated ground equipment using at least 10 gallons of water per acre with a spray pressure of 20 to 50 psi.

Precautions: Applications made during green-up will delay green-up.

Temporary yellowing of grass may occur when treatment is made after regrowth commences.

Restrictions: DO NOT APPLY to grass during its first growing season.

DO NOT APPLY to grass that is under stress from drought, disease, insects, or other causes.

GRASS GROWTH AND SEEDHEAD SUPPRESSION

In unimproved areas, GullWing may be used to suppress seedhead development and growth of certain types of turfgrass.

Preparation: Bermudagrass – Mix 6-8 oz. of GullWing with at least 10 gallons of water per acre. Do NOT add a surfactant to this mix.

Cool-Season Unimproved Turf – Mix 2 oz. of GullWing per acre with 0.25% non-ionic surfactant (refer to the ADJUVANT section of this label for specific recommendations on surfactants).

Tank Mixes: For increased suppression of cool-season unimproved turf, GullWing may be tank-mixed with products such as Campaign® at a rate of 24 oz. or Embark® at a rate of 8 oz. per acre.

Application: Apply uniformly with properly calibrated ground equipment using a spray pressure of 20 to 50 psi.

Apply to Bermudagrass from early green-up until just before seed head initiation.

For optimum performance, application should be made prior to culm elongation.

For applications made prior to mowing, allow at least three days of active growth before mowing.

For applications made after mowing, allow sufficient time for the grasses to recover before applying this product or injury may be increased.

Precautions: Tank mixes may increase injury to desired turf. Consult each product label for recommended turf species and other use directions and precautions.

Applications made during green-up will delay green-up.

Temporary yellowing of grass may occur when treatment is made after regrowth commences.

Restrictions: DO NOT APPLY to grass during its first growing season.

DO NOT APPLY to grass that is under stress from drought, disease, insects, or other causes. GullWing may result in temporary turf damage and/or discoloration when applied to desirable turf, with effects dependent upon environmental conditions.

TOTAL VEGETATION CONTROL WHERE BAREGROUND IS DESIRED

Where bareground is desired, GullWing provides effective preemergence or postemergence control of many annual and perennial broadleaf and grass weeds, and is particularly effective on hard-to-control perennial grasses.

Preparation: Mix 1.5-6 pints GullWing per acre with water as per the instructions in the MIXING AND APPLICATION INSTRUCTIONS at the beginning of this label.

For best results on resistant or difficult to control annual grasses, applications with a total volume of 100 gallons per acre or less should be used.

For difficult to control brush species, use the higher concentrations of herbicide and/or spray volumes. Consult the WEEDS CONTROLLED section above for specific recommendations.

Adjuvants: Always use a spray adjuvant when making a postemergence application. Refer to the ADJUVANT section of this label for specific recommendations.

Tank Mixes: To provide control of species tolerant to GullWing, tank mixes with Roundup®, Finale®, MSMA, Diuron, Karmex®, Pendulum®, Simazine, Banvel®, Vanquish®, or Oust® herbicides may be used. The degree and duration of control are dependent on the rate of GullWing used, the tank mix partner(s), the volume of carrier used, and environmental factors such as rainfall, soil properties, etc.

Tank-Mix Recommendations for Bareground Sites

GullWing (pints / acre)	Pendulum® WDG (lbs. / acre)	Pendulum® 3.3 EC (quarts / acre)	Diuron (lbs. a.i. / acre)
1.5-3.0	6.6	4.8	4-6
2.0-4.0	6.6	4.8	6-10
3.0-6.0	6.6	4.8	8-12

Use higher rates for fall applications, in areas that have not been previously treated, or that have heavy infestations.

For quicker burndown or brown-out of targeted weeds, GullWing may be tank mixed with products such as Roundup®, Finale®, or MSMA.

NOTE: GullWing has been found to be LESS effective in tank mixes with 2,4-D or products containing 2,4-D.

Application: Refer to the MIXING AND APPLICATION INSTRUCTIONS in the GENERAL INFORMATION section at the beginning of this label for directions pertaining to your desired method of application.

Applications of GullWing may be made anytime of the year.

Restrictions: DO NOT apply more than 6 pints of GullWing per acre,

Spot Treatments: GullWing may be used as a follow-up treatment to control escapes or weed encroachment in a bareground situation.

Preparation: Mix 0.5-5.0% GullWing per gallon of water as per the instructions in the MIXING AND APPLICATION INSTRUCTIONS at the beginning of this label.

For difficult to control brush species, use the higher concentrations of herbicide and/or spray volumes. Consult the WEEDS CONTROLLED section for specific recommendations.

Adjuvants: Always use a spray adjuvant when making a postemergence application. Refer to the ADJUVANT section of this label for specific recommendations.

Tank Mixes: To improve residual weed control and expand the number of weeds controlled, tank mixes with Pendulum® or Diuron herbicides may be used.

For quicker burndown or brown-out of targeted weeds, GullWing may be tank mixed with products such as Roundup®, Finale®, or MSMA.

NOTE: GullWing has been found to be LESS effective in tank mixes with 2,4-D or products containing 2,4-D.

26/34

Application: Refer to the MIXING AND APPLICATION INSTRUCTIONS in the GENERAL INFORMATION section at the beginning of this label for directions pertaining to your desired method of application.

Applications of GullWing may be made anytime of the year.

Restrictions: DO NOT apply more than 6 pints of GullWing per acre,

AQUATIC APPLICATIONS

Aquatic applications may be made in and around standing and flowing water for control of floating and emergent aquatic vegetation or terrestrial vegetation growing in or around surface water. They types of water bodies that may be treated are:

- Marine Water Bodies
- Wetlands
- Marshes / Bayous / Wetlands
- Streams / Rivers
- Estuaries
- Ponds / Lakes / Reservoirs
- Drainage Ditches / Canals
- Other slow-moving or still water bodies

In cases where there is minimal or no outflow to public water bodies, GullWing can be applied to private waters that are still, such as ponds, lakes and drainage ditches.

GullWing does not control plants that are completely submerged or have a majority of their foliage under water.

Precautions: Applications may only be made by licensed or certified applicators making applications for programs sponsored by federal or state government agencies such as Water Management Districts, Municipal Authorities or the U.S. Army Corps of Engineers.

Permits may be required to treat public water bodies; consult your local state fish and game agency and water control authorities before making applications of GullWing to public water.

Only invasive plants or plants determined to be a nuisance by a federal or state governmental agency may be treated.

Restrictions: DO NOT apply to water bodies or portions of water bodies where emergent and/or floating weeds do not exist.

DO NOT apply more than 6 pints of product (1.5 lbs acid equivalent) per acre per year.

Aerial application may be made *only* by helicopter.

Precautions for Potable Water Intakes:

If aquatic applications within one-half mile of active potable water intakes need to be made, the water intake must be turned off during application and for a minimum of 48 hours after the application. This type of application may only be made if there are alternative water sources or holding ponds that permit an active potable water intake to be turned off of for a minimum of 48 hours after the applications.

Restrictions:

GullWing may NOT be applied directly to water within one-half mile upstream of an active potable water intake in flowing water bodies such as rivers or streams.

GullWing may NOT be applied within one-half mile of an active potable water intake in a standing water body such as a reservoir, lake or pond.

Note: Existing potable water intakes that are no longer in use, such as those replaced by connections to wells or a municipal water system, are not considered to be active potable water intakes. This restriction does not apply to intermittent, inadvertent overspray of water in terrestrial use sites.

Restrictions for Irrigation Water:

Any water treated with GullWing may not be used for irrigation purposes for 120 days after application or until residue levels are determined by laboratory analysis to be 1.0 ppb or less.

Apply GullWing to irrigation canals or ditches ONLY if the above restriction can be observed.

DO NOT apply GullWing within one mile of an active irrigation water intake in lakes or reservoirs during the irrigation season. Applications closer than one mile from an inactive irrigation water intake may be made during the off-season, provided that the above restriction can be observed.

DO NOT apply GullWing within one-half mile downstream of an active irrigation water intake. If making applications upstream of an active irrigation water intake, *the intake must be turned off* until the treated water upstream has flowed completely past the irrigation intake. Before applying GullWing upstream of an active irrigation water intake, consult your local, state and/or federal authorities.

INSTRUCTIONS FOR AQUATIC APPLICATIONS

GullWing has little to no effect on submerged aquatic vegetation and must be applied to the emergent foliage of the target vegetation. In general, applications should be made in a manner that maximizes spray interception by the target vegetation and minimizes overspray into the water. GullWing may be applied as a draw down treatment in areas described above by applying to weeds after water has been drained and then allowing 14 days before reintroducing water to the drained area.

- For best results, weeds should be growing vigorously at the time of application and the spray solution should include a surfactant (see the ADJUVANTS section of this label for specific recommendations).
- Aquatic applications of GullWing should be made in a minimum of 5 gallons of water per acre using surface or helicopter application equipment.
- To prevent concentration of this herbicide in water, applications to moving bodies of water should be made while traveling upstream.
- Do not treat more than one half of the surface area of the water in a single operation and wait at least 10 to 14 days between treatments.
- To allow fish to move into untreated areas, begin applications along the shore and proceed outwards in bands.
- Because oxygen depletion due to decaying vegetation may result in the suffocation of some sensitive fish species, when the target vegetation covers a large percentage of the surface area of a slow or non-flowing water body, the area should be treated in strips.
- For one hour after application, avoid wash-off of sprayed foliage by spray boat or recreational boat backwash.

AQUATIC AERIAL APPLICATIONS

Refer to the MIXING AND APPLICATION INSTRUCTIONS section for general information regarding aerial applications of GullWing.

Refer to the PRECAUTION FOR AVOIDING INJURY TO NON-TARGET PLANTS section for guidance in minimizing unwanted exposure to non-target plants when making aerial applications.

NOTE: Aerial applications may be made *only* by helicopter.

- Preparation:** Mix GullWing for the intended use as per the instructions in the AQUATIC PESTS CONTROLLED tables below.
- Adjuvants:** For best results, a nonionic or silicon based surfactant or methylated seed oil should be added, refer to the ADJUVANT section of this label for specific recommendations).
If needed, a foam reducing agent may be added.
- Tank Mixes:** To enhance the spectrum or control of emergent and floating aquatic vegetation, GullWing may be tank mixed with other aquatic use herbicides. Always follow the more restrictive label when making an application involving tank mixes.
- Application:** Uniformly apply the recommended amount of GullWing in 5 to 30 gallons of water per acre following the instructions for aerial applications in the MIXING AND APPLICATION INSTRUCTIONS section at the beginning of this label.
- Precautions:** DO NOT make applications by helicopter unless appropriate buffer zones to prevent spray drift out of the target area can be maintained, or when spray drift damage as a result of helicopter application can be tolerated.

Application equipment, including landing gear must be thoroughly cleaned immediately after use of this product. Prolonged exposure of this product to uncoated steel (except stainless steel) surfaces may result in corrosion and failure of the exposed part. The maintenance of an organic coating (paint) may prevent corrosion.

AQUATIC GROUND APPLICATIONS

GullWing may be applied using any of the ground application methods described in the MIXING AND APPLICATION INSTRUCTIONS section at the beginning of this label.

Refer to the AQUATIC SITES CONTROLLED tables below for recommended use rates and species specific instructions.

GROUND APPLICATION Restrictions:

- DO NOT apply more than 6 pints of GullWing per acre,
- When making applications do not apply to the point of run off of spray solution from the target vegetation.

AQUATIC PESTS CONTROLLED

GullWing will control the following target species as specified in the APPLICATION RECOMMENDATION section of the table. Rate recommendations are expressed in terms of product volume for broadcast applications and as a % solution for directed applications including spot treatments.

Restrictions:

For % solution applications, DO NOT apply more than the equivalent of 1.5 quarts of GullWing per acre.

FLOATING SPECIES			
COMMON NAME	SCIENTIFIC NAME	APPLICATION RATE (pints/acre)	SPECIFIC INSTRUCTIONS
Duckweed	<i>Lemna minor</i>	2.0-3.0	Apply in 100 gallons of water per acre.
Duckweed, Giant	<i>Spirodela polyrriza</i>	2.0-3.0	Apply in 100 gallons of water per acre.
Frogbit	<i>Limnobium spongia</i>	1.0-2.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Spadderdock	<i>Nuphar luteum</i>	1.0-2.0 GullWing with 4.0-6.0 glyphosate	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Water Hyacinth	<i>Eichhornia crassipes</i>	1.0-2.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Water Lettuce	<i>Pistia stratiotes</i>	1.0-2.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.

EMERGED SPECIES			
COMMON NAME	SCIENTIFIC NAME	APPLICATION RATE (pints/acre)	SPECIFIC INSTRUCTIONS
Alligatorweed	<i>Alternanthera philoxeroides</i>	1.0-4.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage. Do not mix with glyphosate or higher GullWing rates will be necessary for control.
Arrowhead, Duck-Potato	<i>Sagittaria</i> spp.	1.0-2.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Bacopa, lemon	<i>Bacopa</i> spp.	1.0-2.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Parrot feather	<i>Myriophyllum aquaticum</i>	1.0-2.0	There must be foliage above the waterline in order for sufficient herbicide uptake to take place. Be sure to cover all actively growing foliage.
Pennywort	<i>Hydrocotyle</i> spp.	1.0-2.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Pickerelweed	<i>Pontederia cordata</i>	2.0-3.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.

30/34

Draft GullWing Label
June 17, 2011
Revision 4

EMERGED SPECIES			
COMMON NAME	SCIENTIFIC NAME	APPLICATION RATE (pints/acre)	SPECIFIC INSTRUCTIONS
Taro, Wild; Dasheen; Elephant's Ear; Coco Yam	<i>Colocasia esculentum</i>	4.0-6.0	Apply in 100 gallons of water per acre with an adjuvant to enhance adhesion to the foliage. Be sure to cover all actively growing foliage.
Water Lilly	<i>Nymphaea odorata</i>	2.0-3.0	Apply in 100 gallons of water per acre. Be sure to cover all actively growing foliage.
Water Primrose	<i>Ludwigia uruguayensis</i>	4.0-6.0	Tank mixing with glyphosate may result in reduced control.

TERRESTRIAL / MARGINAL SPECIES			
COMMON NAME	SCIENTIFIC NAME	APPLICATION RATE (pints/acre)	SPECIFIC INSTRUCTIONS
Soda Apple, aquatic; Nightshade	<i>Solanum tampicense</i>	2.0	
Bamboo, Japanese	<i>Phyllostachys</i> spp.	3.0-4.0	Apply when plant is actively growing but before setting seed head. Be sure to cover all actively growing foliage.
Brazilian Pepper; Christmasberry	<i>Schinus terebinthifolius</i>	1.0-2.0	Apply to foliage.
Cattail	<i>Typha</i> spp.	1.0-2.0	Apply to green foliage after full leaf elongation. Higher rates should be used in the south and lower rates should provide control in the north.
Chinese Tallow Tree	<i>Sapium sebiferum</i>	1.0-1.5	Apply to foliage.
Cogon Grass	<i>Imperata cylindrical</i>	2.0 <i>quarts</i> GullWing with MSO (as per label instructions)	Burn foliage and till the area to be treated. Apply in the fall to all new growth.
Cordgrass, prairie	<i>Spartina</i> spp.	4.0-6.0	Be sure to cover all actively growing foliage.
Cutgrass	<i>Zizaniopsis miliacea</i>	4.0-6.0	Be sure to cover all actively growing foliage.
Elephant Grass; Napier Grass	<i>Pennisetum purpureum</i>	3.0	Be sure to cover all actively growing foliage.
Flowering Rush	<i>butumu typla</i>	2.0-3.0	Be sure to cover all actively growing foliage.
Giant Reed; Wild Cane	<i>Arundo donax</i>	4.0-6.0	Apply in spring, being sure to cover all actively growing foliage.
Golden Bamboo	<i>Phyllostachys aurea</i>	3.0-4.0	Apply when plant is actively growing but before setting seed head. Be sure to cover all actively growing foliage.
Junglerice	<i>Echinochloa colonum</i>	3.0-4.0	Be sure to cover all actively growing foliage.
Knapweeds	<i>Centaurea</i> spp.	2.0-3.0 GullWing with 1.0 quart MSO	Apply in the fall after plants begin to senesce
Knotweed, Japanese	<i>Polygonum cuspidatum</i>	3.0-4.0	Apply postemergence only, being sure to cover all actively growing foliage.

TERRESTRIAL / MARGINAL SPECIES			
COMMON NAME	SCIENTIFIC NAME	APPLICATION RATE (pints/acre)	SPECIFIC INSTRUCTIONS
Melaleuca; Paperbark tree	<i>Melaleuca quinquenervia</i>	Established Stands: 6.0 GullWing with 6.0 Glyphosate and a spray adjuvant. For best results use 4 quarts / acre of methylated seed oil for the adjuvant.	For ground foliar applications be sure to cover all actively growing foliage. For broadcast foliar applications apply aerially with a minimum of two cross passes using a rate of 10 gallons/acre.
		Spot Applications: 25% solution of GullWing with 25% solution of Glyphosate and 1.25% solution MSO in water.	For spot treatment apply as a frill or stump treatment, see the instructions for Stump and Cut Stem Treatments above for further instructions.
Nutgrass; Kili'p'opu	<i>Cyperus rotundus</i>	2.0 GullWing with 1.0 quart MSO	Apply early postemergence being sure to cover all actively growing foliage.
Nutsedge	<i>Cyperus</i> spp.	2.0-3.0	Apply to all actively growing foliage postemergence, or as an incorporated application preemergence. Preemergence applications that are not incorporated will not provide control.
Phragmites; Common Reed	<i>Phragmites australis</i>	4.0-6.0	Apply to all actively growing foliage after full leaf elongation. If large amounts of dead stem tissue is evident, mow or burn the treatment site and allow to regrow to approximately 5' tall before applying. Lower rates will provide control in the north, higher rates are necessary in the south.
Poison Hemlock	<i>Conium maculatum</i>	2.0 GullWing with 1.0 quart MSO	Apply preemergence or postemergence to rosette stage but prior to flowering.
Purple Loosestrife	<i>Lythrum salicaria</i>	1.0	Be sure to cover all actively growing foliage.
Reed Canarygrass	<i>Phalaris arundinacea</i>	3.0-4.0	Be sure to cover all actively growing foliage.
Rose, Swamp	<i>Rosa palustris</i>	2.0-3.0	Be sure to cover all actively growing foliage.
Russian Olive	<i>Elaeagnus angustifolia</i>	2.0-4.0	Be sure to cover all actively growing foliage.

TERRESTRIAL / MARGINAL SPECIES			
COMMON NAME	SCIENTIFIC NAME	APPLICATION RATE (pints/acre)	SPECIFIC INSTRUCTIONS
Saltcedar; Tamarisk	<i>Tamarix</i> spp.	Aerial Applications: 2.0 quarts GullWing with 0.25% v/v NIS	Do not disturb treated plants for at least two years.
		Spot Applications: 1.0% solution of GullWing with 0.25% v/v NIS	
Smartweed	<i>Polygonum</i> spp.	2.0	Apply early postemergence being sure to cover all actively growing foliage.
Sumac	<i>Rhus</i> spp.	2.0-3.0	Be sure to cover all actively growing foliage.
Swamp Morning Glory; Water Spinach; Kangkong	<i>Ipomoea aquatica</i>	1.0-2.0 GullWing with 1.0 quart MSO	Apply early postemergence being sure to cover all actively growing foliage.
Torpedo Grass	<i>Panicum repens</i>	4.0	Be sure to cover all actively growing foliage.
White Top; Hoary Cress	<i>Cardaria draba</i>	1.0-2.0	Apply to foliage when flowering in the spring.
Willow	<i>Salix</i> spp.	2.0-3.0	Be sure to cover all actively growing foliage.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store below 10°F.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site 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, then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity < 5 gallons): 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 ¼ 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.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Phoenix Environmental Care, LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Phoenix Environmental Care, LLC and Seller harmless for any claims relating to such factors.

Phoenix Environmental Care, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Phoenix Environmental Care, LLC, and Buyer and User assume the risk of any such use. PHOENIX ENVIRONMENTAL CARE, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent allowed by state law, neither Phoenix Environmental Care, LLC or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF PHOENIX ENVIRONMENTAL CARE, LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF PHOENIX ENVIRONMENTAL CARE, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Phoenix Environmental Care, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Phoenix Environmental Care, LLC.

GullWing is a trademark of Phoenix Environmental Care, LLC.

Banvel® and Pendulum® are registered trademarks of BASF.

Finale® is a registered trademark of Bayer.

Garlon® and Tordon® are registered trademarks of Dow AgroSciences LLC.

Escort®, Karmex®, Krenite®, Oust®, and Telar® are registered trademarks of E.I. du Pont de Nemours and Company.

Accord®, Campaign®, and Roundup® are registered trademarks of the Monsanto Company.

Embark® is a registered trademark of PBI/Gordon Corporation.

Vanquish® is a registered trademark of a Syngenta Group Company.

Thru-Valve Boom® is a trademark of Waldrum Specialties.