2217-774 09/17/2008 1/21

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 17 2008

James L. Kunstman
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 014090
Kansas City, MO 64101

Dear Dr. Kunstman:

Subject: Label Amendment for RED: 2,4-D, and Dicamba
EH 1068 Trimec Ester
EPA Registration Number 2217-774

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. The signal word currently on the label "Caution" must be revised to read "Warning."

2. Based on toxicity ranking per the acute toxicity review, the First Aid statements should be revised so that the "If in Eyes" statement appear immediately after the "If Swallowed" statement.

3. Per the acute toxicity review and PR Notice 2001-1, the following should be added to the label:

   "You may also contact [insert phone number 1-800-xxx-xxxx] for emergency medical treatment information."

4. Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to include the statement "Causes skin irritation." In addition, revise the statement "Avoid contact with eyes, skin or clothing, or inhaling spray mist" to read "Do not get on skin or clothing. Avoid contact with eyes and inhaling spray mist."

5. Based on the acute toxicity study, the specific PPE listed in the PPE section must be revised to read as follows:

   "- coveralls over short-sleeved shirt and short pants
   - chemical-resistant footwear and socks
   - chemical-resistant gloves

- chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate
- for overhead exposure wear chemical-resistant headgear"

6. The mechanical transfer text (first two paragraphs) in the Engineering Control Statements section, is not required for 2,4-D.

7. Delete the text "except as noted on appropriate labels" from the Environmental Hazards section of the label.

8. With the exception of drift-related text appearing in the Environmental Hazards ("Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas") and General Precautions and Restrictions ("Do not apply this product in a way that will contact workers or other persons, either directly or through drift"), all drift text appearing on the label must be placed together and be located below the required text currently on the label. Any text conflicting with the required text must be deleted from the label.

9. Change first bullet under Storage and Disposal to read "**Pesticide** Storage".

10. Under broadcast application to **Mixed Brush**, add the statement "Limited to one application per year to mixed brush."

    - In the tables entitled "Limitations on 2,4-D applications to ornamental turfgrass" delete the text "excluding spot treatments" from the footnote.

11. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

12. Add the following statements to the labeling: Use of this product in certain portions of California, Oregon and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition, et al. v. EPA, C01-0132C, (W.D. WA). For further information, please refer to EPA Web Site: http://www.epa.gov/espp.

One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,

Joanne I. Miller

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

Enclosure

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EH1068 TRIMEC® ESTER

EPA Reg. No. 2217-774

Two sublabels represent the entire or master label of EH1068 Trimec® Ester. Please refer to the appropriate section of the labeling as shown as follows:

Section
Label language common to all sublabels
Sublabel 1
Sublabel 2: Gordon's Brushmaster® Herbicide
Appendix
Document Control Information

pbi/gordon corporation
An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101

Label Language Common to All Sublabels

EH1068 TRIMEC® ESTER

EPA Reg. No. 2217-774

ACTIVE INGREDIENT:

(2-ethylhexyl) ester of 2,4-dichlorophenoxyacetic acid	18.85%
2-ethylhexyl ester of (+)-R-2-(2,4-dichlorophenoxy) propionic acid	9.24%
Dicamba: 3,6-dichloro-o-anisic acid	3.01%
INERT INGREDIENTS:	68.90%
TOTAL	100.00%

THIS PRODUCT CONTAINS:
1.02 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 12.50%
0.51 lbs. (+)-R-2-(2,4-dichlorophenoxy) propionic acid equivalent per gallon or 6.25%
0.24 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 3.01%
Isomer Specific by AOAC Method
Contains petroleum distillates
TRIMEC® is a registered trademark of PBI/Gordon Corporation.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
SEP 17 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.
2217-774

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.)

STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

CAUTION: Harmful if swallowed, absorbed through skin or inhaled. Causes moderate eye injury. Avoid contact with eyes, skin or clothing, or inhaling spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are barrier laminate, nitrile rubber, neoprene rubber, or Viton. If you want more options, follow the instructions for category E on an EPA chemical resistance category selection chart.

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All mixers, loaders, applicators, flaggers, and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes and socks, plus
- chemical resistant gloves when applying with any handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.
- chemical resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

See engineering controls for additional requirements.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statements

Containers over 1 gallon and less than 5 gallons: Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron.

Containers of 5 gallons or more: Do not open-pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

Pilots must use an enclosed cockpit that meets the requirements listed in the 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.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Users should 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.

First Aid	
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If swallowed:	• Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Contains petroleum distillates-vomiting may cause aspiration pneumonia.

Environmental Hazards

This pesticide may be toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.
This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

STORAGE AND DISPOSAL

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

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: *For Plastic Containers* - 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. *For Metal Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED. *TO THE EXTENT CONSISTENT WITH APPLICABLE LAW*, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. *TO THE EXTENT CONSISTENT WITH APPLICABLE LAW*, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTIAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

SUBLABEL 1

DIRECTIONS FOR USE

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

General Precautions and Restrictions:

- Do not enter or allow people (or pets) to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

EH1068 Trimec® Ester is recommended to control perennial broadleaf weeds and undesirable woody plants established in noncropland. It is effective for buckbrush, poison ivy, multiflora rose, and sumac established in the uncultivated areas presented below:

UNCULTIVATED AGRICULTURAL AREAS AND UNCULTIVATED NONAGRICULTURAL AREAS:

A. Recommended Noncropland Sites.

- Barrier strips
- Farmyards
- Fencerows or fence lines
- Firebreaks
- Highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadsides, roadside ditches, road shoulders, road embankments, dividers, and medians.
- Industrial sites: Lumberyards, tank farms, fuel or equipment storage areas.
- Municipal, state, and federal lands: Airports and military installations
- Railroad rights-of-way
- Recreation areas: Fairgrounds, golf courses, parks, and areas adjacent to athletic fields.
- Utility rights-of-way: Telephone, pipeline, electrical powerlines, and communication transmission lines

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

B. Prohibitions for Noncropland Sites.

- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (noncropland sites adjacent to the edges of a body of water) for lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays).
- Do not apply to wetlands (swamps, bogs, potholes, or marshes).
- Do not apply to agricultural irrigation water or on agricultural irrigation ditchbanks and canals.
- Do not apply to agricultural drainage water or on agricultural ditchbanks.

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast, chemigation) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

When applying sprays that contain 2,4-D as the sole active ingredient, or when applying sprays that contain 2,4-D mixed with active ingredients that require a Coarse or coarser spray, apply only as a Coarse or coarser spray (ASAE standard 572) or a volume mean diameter of 385 microns or greater for spinning atomizer nozzles.

When applying sprays that contain 2,4-D mixed with other active ingredients that require a Medium or more fine spray, apply only as a Medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed
Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind. If applying a Medium spray, leave one swath unsprayed at the downwind edge of the treated field.

Temperature Inversions
If applying at wind speeds less than 3 mph, the applicator must determine if: a)conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants
Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

2,4-D esters may volatilize during conditions of low humidity and high temperatures. Do not apply during conditions of low humidity and high temperatures.

Other State and Local Requirements
Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment
All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

Additional requirements for ground boom application: Do not apply with a nozzle height greater than 4 feet above the crop canopy.

Additional requirements for aerial applications: The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.

Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety. This requirement does not apply to forestry or rights-of-way applications.

When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this by adjusting the path of the aircraft upwind.

APPLICATION TIMING FOR MIXED BRUSH:
Spraying can be effective throughout the growing season from full leaf to leaf drop for mixed brush. Full cover sprays should be applied during warm weather when brush and broadleaf weeds are young and actively growing. All leaves, stems, and shoots should be thoroughly wetted to the ground. Do not cut brush until the herbicide has translocated throughout the plant causing root death. Basal bark, cut stump, and frill treatments of EH1068 Trimec® Ester are appropriate during the dormant period before bud growth or any signs of active growth of the mixed brush. However, basal bark treatments may be applied anytime of the year except when water or snow prevents spraying to the ground line.

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BRUSH CONTROLLED:			
Ash	Buckbrush	Honey Locust	Spruce
Aspen	Cedar	Honeysuckle	Sumac
Birch	Cherry	Kudzu	Sycamore
Blackberry	Cottonwood	Multiflora Rose	Trumpetcreeper
Black Cherry	Dogwood	Oak	Wild Plum
Black Locust	Elm	Pine	Willow
Brambles	Gooseberry	Shortleaf Pine	

BROADLEAF WEEDS			
Aster, white heath & white prairie	Dock	Lespedeza, common	Spotted spurge
Bedstraw	Dogfennel	Mallow, common	Spurge
Beggarweed, creeping	English daisy	Matchweed	Sunflower
Bindweed	False dandelion (*spotted catsear & common catsear)	Mouseear chickweed	Thistle
Black medic	Field bindweed (*morningglory & creeping jenny)	Mustard	Velvetleaf (*pie marker, Indian mallow)
Broadleaf plantain	Field oxeye-daisy (*creeping oxeye)	Nettle	*Veronica* (*corn speedwell)
Buckhorn plantain	Filaree, whitestem & redstem	*Oxalis* (*yellow woodsorrel & creeping woodsorrel)	Virginia buttonweed
Bull thistle	Florida pusley	Parsley-piert	White clover (*Dutch clover, honeysuckle clover, white trefoil & purplewort)
Burclover	Ground ivy	Pennsylvania smartweed (*smartweed)	Wild carrot
Burdock, common	Groundsel	Pennywort (*dollarweed)	Wild garlic
Buttercup, creeping	Hawkweed	Pepperweed	Wild geranium
Carpetweed	Healall	Pigweed	Wild lettuce
Chickweed, common	Henbit	Pineappleweed	Wild mustard
Chicory	Jimsonweed	Plantain	Wild onion
Cinquefoil	Kochia	Poison ivy	Wild strawberry
Clover	Knotweed	Poison oak	Wild violet
Cocklebur	Lambsquarters	Puncturevine	Yarrow
Compassplant	Lawn burweed	Purslane	Yellow rocket
Curly dock		Ragweed	and many other broadleaf weeds
Dandelion		Red sorrel (*sheep sorrel)	
Dayflower		Shepherdspurse	
Deadnettle			
*Synonyms			

SPRAY PREPARATION:

Oil Spray - Add one-half the required amount of diesel oil (No. 1 or No. 2 fuel oil) to the spray tank, then add EH1068 Trimec® Ester with agitation and complete filling the tank with diesel oil. Mix thoroughly and provide adequate agitation during mixing and spraying.

Water Spray - Add one-half of the required amount of water to the spray tank, then add slowly EH1068 Trimec® Ester with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

Tank Mixing With Garlon® 4 Herbicide - EH1068 Trimec® Ester and Garlon® 4 Herbicide can be tank mixed in oil or water carriers for use in roadsides, rights-of-way, railroads, fencerows, industrial sites and other similar noncrop areas. Add one-third of the required amount of diesel oil or water to the spray tank. Add the EH1068 Trimec® Ester slowly with agitation, then add another one-third of the carrier to the tank. Next add slowly the Garlon® 4 Herbicide and the balance of the carrier. Do not mix the chemicals simultaneously. Continue the agitation during each step. All label limitations, dosage rates, and precautions of both products must be followed. A mixture of EH1068 Trimec® Ester and Garlon® 4 Herbicide should be used in accordance with the more restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Aerial applications of this tank mix can be made with helicopter only.

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BROADCAST FOLIAR APPLICATIONS:
Noncropland including Barrier Strips, Farmyards, Fencerows, Firebreaks, Highway Rights-of-way, Industrial Sites, Municipal, State and Federal Lands, Railroad Rights-of-way, Recreation Areas, and Utility Rights-of-way.

Broadcast applications to annual and perennial weeds: Apply to emerged weeds. For best results, treat when weeds are young and actively growing.

The maximum application rate to general noncropland sites is 2.0 gallons of product per acre per application per site.

When multiple applications of up to 2.0 lbs. acid equivalent per acre are utilized to reach the maximum seasonal use rate, do not make a repeat application within 30 days of the previous application.
Minimum spray volume: Use 2 or more gallons of spray solution per acre.
Number of applications: Limited to 2 applications per year.

Broadcast applications to woody plants: Apply to trees and brush when foliage is fully expanded and plants are actively growing.

Up to 4.0 gallons of product per acre (4.0 lbs. acid equivalent per acre) may be applied in a single application to rights-of-way, including electrical power lines, communication lines, pipelines, highways and railroads that intersect wooded areas or stands of trees, brush and woody plants.

The maximum noncropland application rate for tree, brush and woody plant control is 4.0 gallons of product per acre per application per site.

Target species	Application schedule	Maximum application rate, Gallons of product per acre	Maximum application rate, Pounds of acid equivalent per acre per application	Maximum number of applications per year	Minimum days between applications	Minimum spray volume, gallons per acre
Annual and perennial weeds	Broadcast	2.0 gal/A	2.0 #/A	2	30 days	2
Woody plants	Broadcast and high volume foliar	4.0 gal/A	4.0 #/A	1	NA	See Tables 1-2.

High volume foliar applications (100-400 gallons per acre):
Apply 1.0-4.0 gallons of product per acre with adequate water or apply a 1.0-4.0% vol/vol spray solution as a full cover spray with high volume equipment. Use the lower spray concentrations in the range for susceptible species and use the higher spray concentrations within the range for hard-to-control species, for mature plants during the late summer or under adverse environmental conditions (e.g. drought). Spray broadleaf weeds, woody plants or mixed brush uniformly and thoroughly by wetting all leaves, stems, bark and root collars. The total volume of spray solution required for adequate coverage of solid stands of mixed brush can range from 100-400 gallons of spray solution per treated acre. The spray preparation chart for applications on a spray-to-wet basis is shown below in Table 1.

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Table 1. Instructions for preparing 100-400 gallons of spray solution at 1.0-4.0% spray concentration with water for high volume foliar applications.				
Spray solution per acre, Gallons	**Amount of Product Needed for Spray Concentration of:**			
	1.0%	**1.3%**	**2.0%**	**4.0%**
100	1.0 gal.	1.33 gal.	2.0 gal.	**4.0 gal.**
200	2.0 gal.	2.67 gal.	**4.0 gal.**	----
300	3.0 gal.	**4.0 gal.**	----	----
400	**4.0 gal.**	----	----	----
Equal measures: 1gallon = 4 quarts= 8 pints= 128 fl. oz.				

The maximum seasonal application rate for trees, brush and woody plant control is 4.0 gallons of product per acre per application per site.

For Backpack Sprayers, Knapsack Sprayers, And Hand-pressurized Pump Sprayers

Table 2. Instructions for preparing 1-3 gallons of spray solution at 1.0 -4.0% spray concentration with water for high volume foliar applications.				
Gallons Of Water	**Amount Of Product Needed for Spray Concentration of :**			
	1.0%	**1.3%**	**2.0%**	**4.0%**
1	2½ tablespoons	3½ tablespoons	5 tablespoons	10 tablespoons
2	5 tablespoons	7 tablespoons	5 fl. oz.	10 fl. oz.
3	4 fl. oz.	5 fl. oz.	7½ fl. oz.	15 fl. oz.
Equal measures: 1 fl. oz. = 2 Tablespoons (Tbs.) = 6 Teaspoons (tsp.)				

Mixed Brush Applications With Aerial Equipment:
Use 1.0 to 4.0 gallons per acre of EH1068 Trimec® Ester in 8 to 25 gallons of water per acre with aerial applications for mixed brush in noncropland areas. For best control, the brush and broadleaf weeds should be young and actively growing at the time of spraying. Use the higher rates and spray volumes when plants are dense or under drought conditions. Apply with aircraft equipped to minimize spray drift and apply only when there is little or no wind.

Individual Plant Treatments:
BASAL AND DORMANT APPLICATIONS:
Limitations for basal spray, frill, and cut surface (stump) treatments. Use only one basal spray, frill or cut surface application per year. Refer to the section for broadcast applications to woody plants for additional limitations and maximum rates.

Basal Bark Method - Apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed. Thorough coverage is required for all basal treatments.

For Fuel Oil or Undiluted Low Volume Applications - Mix a full oil spray containing 6.7 gallons of EH1068 Trimec® Ester, 1.3 to 2.3 gallons of diesel oil, and 1.0 to 2.0 gallons of penetrants. Substitutes for diesel oil include mineral oil, kerosene, and oil blends formulated for basal bark applications. Penetrants appropriate for oil soluble herbicides may improve control. Refer to Table 3.

TABLE 3. USE RATES FOR BASAL BARK METHOD WITH LOW VOLUME APPLICATIONS.				
	Gallons Needed for Desired Volume			
Volume of Spray Solution, Gallons	EH1068 Trimec® Ester	Penetrants[a)]	Diesel Oil[b)]	Basal Oil[c)]
10	6.7	1.0 to 2.0	1.3 to 2.3	-----
10	6.7	1.0 to 2.0	-----	1.3 to 2.3

[a)]Penetrants such as Cide-Kick or Cide Kick II may improve control. Penetrant concentrations range from 10 to 20% of the spray volume and the 20% concentration may be more suitable in cold weather. Crop oil concentrates with pariffinic oil concentrations greater than 80% may also be used.

[b)]Mineral oil or kerosene can be substituted for diesel oil.

[c)]Androc Oil, Hygrade I, Arborchem Basal Oil, JLB Oil Plus, or other proprietary basal oils may be used.

For Fuel Oil or Diluted High Volume Applications - Mix 6.0 to 8.0 gallons of EH1068 Trimec® Ester with 90 to 94 gallons of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, or mineral oil).

For Backpack Sprayers, Knapsack Sprayers, and Hand Pump Sprayers - Mix 5.0 to 10.0 fluid ounces of EH1068 Trimec® Ester with 1 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or oil blends formulated for basal bark applications). Or use the equivalent spray concentration of 4.0 to 8.0% volume/volume.

Spray volumes will depend upon the sizes, types and densities of brush present. Apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed.

Cut Surface--Stump Treatment - This method is most effective and economical on stumps with diameters larger than 3 to 4 inches. This treatment can be applied throughout the year except when snow, ice or water prevents thorough spray coverage.

For Ground Equipment - Mix 1.0 to 2.0 gallons of EH1068 Trimec® Ester with 23 to 24 gallons of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil or other oil blends formulated for basal applications). Or use the equivalent spray concentration of 4.0 to 8.0% volume/volume.

For Backpack Sprayers, Knapsack Sprayers, and Hand Pump Sprayers - Mix 5.0 to 10.0 fluid ounces of EH1068 Trimec® Ester with 1.0 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or other oil blends formulated for basal applications). Spray thoroughly the cut surfaces, bark, and exposed roots. Treat entire circumference of the tree. Drench until runoff to the soil surface is noticed.

Frill Treatment - This treatment is recommended for culling trees with trunk diameters greater than 5 to 6 inches. Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark but do not remove chips.
Mix 6.0 to 8.0 gallons of EH1068 Trimec® Ester in 100 gallons of oil and treat freshly cut frills at anytime of the year. Or mix 8.0 to 10.0 fluid ounces of EH1068 Trimec® Ester with 1.0 gallon of oil (diesel oil, No. 1. or No. 2 fuel oil, kerosene, mineral oil, or other oil blends formulated for basal applications). Spray or pour the spray mixture into the frills without runoff.

USE PRECAUTIONS:

- Do not apply this product through any type of irrigation system.
- Do not apply when temperatures exceed 85°F and humidity is high.

ORNAMENTAL LAWNS & TURF (Cool Season Grasses Other Than Bentgrass):
Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

The best results will be obtained from spring or early fall applications when weeds have emerged and are actively growing. Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

USE PRECAUTIONS:

- Avoid spray droplets onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants.
- Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present.
- Use only lawn-type sprayers.
- Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other ornamental species.
- Do not apply to newly seeded grasses until well established.
- Do not spray when air temperatures exceed 85°F.
- Seed can be sown 3 to 4 weeks after application.
- Do not apply this product through any type of irrigation system.

Application Rates - Apply 4 to 6 pints of product in 20 to 260 gallons of water per acre (1.5 to 2.2 fluid ounces in 1 to 6 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

Limitations on 2,4-D applications to ornamental turfgrass			
Use Site	Maximum Rate per Application	Maximum Number of Applications per Year	Maximum 2,4-D Acid Equivalent Amount Applied per Year
Ornamental turfgrass	6 pints/A (0.8 lb 2,4-D ae/A)	2	1.6 lb 2,4-D ae/A
ae = Acid Equivalent. Do not exceed the maximum seasonal rate of 12 pints (1.6 lb 2,4-D ae) per acre per season, excluding spot treatments.			

Controlled Droplet Applicators (CDA) - Controlled droplet applicators allow ultra low spray volumes, and EH1068 Trimec® Ester may be applied at the rate of 4 pints of product per acre (1.5 fluid ounces of product per 1,000 square feet). Avoid overlapping between spray patterns. For the Herbi ULV sprayer, add 1.5 pints of EH1068® Ester to 3.5 pints of water and apply this mixture to 16,500 square feet of lawn.

Small Area Applications (Not Recommended For Hose End Sprayers) - For spot treatments and small areas, mix EH1068 Trimec® Ester at 1.5 fluid ounces per 1 gallon of water per 1,000 square feet or follow the recommendations for pressure sprayers presented below. Spray emerged weeds that are actively growing at anytime of the season. On newly established lawns, apply EH1068 Trimec® Ester after the grass has been mowed at least 3 times. Do not water the lawn within 24 hours after application and observe use precautions.

Use Rates In Ornamental Lawns And Residential Turf With Hand Operated Sprayers			
Amount of Product		**Amount of Water**	**Area to be Treated**
3 Tablespoons	1.5 fluid ounces	1 Gallon	1,000 Square Feet
6 Tablespoons	3.0 fluid ounces	2 Gallons	2,000 Square Feet
9 Tablespoons	4.5 fluid ounces	3 Gallons	3,000 Square Feet

SUBLABEL 2
Gordon's Brushmaster® Herbicide

DIRECTIONS FOR USE

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

Gordon's Brushmaster® Herbicide is recommended to control perennial broadleaf weeds and undesirable woody plants established in noncropland. It is effective for buckbrush, poison ivy, multiflora rose, and sumac established in the uncultivated areas presented below:

UNCULTIVATED AGRICULTURAL AREAS AND UNCULTIVATED NONAGRICULTURAL AREAS:
A. Recommended Noncropland Sites.

- Barrier strips
- Farmyards
- Fencerows or fence lines
- Firebreaks
- Highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadsides, roadside ditches, road shoulders, road embankments, dividers, and medians.
- Industrial sites: Lumberyards, tank farms, fuel or equipment storage areas.
- Municipal, state, and federal lands: Airports and military installations
- Railroad rights-of-way
- Recreation areas: Fairgrounds, golf courses, parks, and areas adjacent to athletic fields.
- Utility rights-of-way: Telephone, pipeline, electrical powerlines, and communication transmission lines

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

B. Prohibitions for Noncropland Sites.

- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (noncropland sites adjacent to the edges of a body of water) for lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays).
- Do not apply to wetlands (swamps, bogs, potholes, or marshes).
- Do not apply to agricultural irrigation water or on agricultural irrigation ditchbanks and canals.
- Do not apply to agricultural drainage water or on agricultural ditchbanks.

APPLICATION TIMING FOR MIXED BRUSH:
Spraying can be effective throughout the growing season from full leaf to leaf drop for mixed brush. Full cover sprays should be applied during warm weather when brush and broadleaf weeds are young and actively growing. All leaves, stems, and shoots should be thoroughly wetted to the ground. Do not cut brush until the herbicide has translocated throughout the plant causing root death.
Basal bark, cut stump, and frill treatments of Gordon's Brushmaster® Herbicide are appropriate during the dormant period before bud growth or any signs of active growth of the mixed brush. However, basal bark treatments may be applied anytime of the year except when water or snow prevents spraying to the ground line.

BRUSH CONTROLLED:			
Ash	Buckbrush	Honey Locust	Spruce
Aspen	Cedar	Honeysuckle	Sumac
Birch	Cherry	Kudzu	Sycamore
Blackberry	Cottonwood	Multiflora Rose	Trumpetcreeper
Black Cherry	Dogwood	Oak	Wild Plum
Black Locust	Elm	Pine	Willow
Brambles	Gooseberry	Shortleaf Pine	

BROADLEAF WEEDS			
Aster, white heath & white prairie Bedstraw Beggarweed, creeping Bindweed Black medic Broadleaf plantain Buckhorn plantain Bull thistle Burclover Burdock, common Buttercup, creeping Carpetweed Chickweed, common Chicory Cinquefoil Clover Cocklebur Compassplant Curly dock Dandelion Dayflower Deadnettle Dock	Dogfennel English daisy False dandelion (*spotted catsear & common catsear) Field bindweed (*morningglory & creeping jenny) Field oxeye-daisy (*creeping oxeye) Filaree, whitestem & redstem Florida pusley Ground ivy Groundsel Hawkweed Healall Henbit Jimsonweed Knotweed Kochia Lambsquarters Lawn burweed Lespedeza, common	Mallow, common Matchweed Mouseear chickweed Mustard Nettle *Oxalis* (*yellow woodsorrel & creeping woodsorrel) Parsley-piert Pennsylvania smartweed (*smartweed) Pennywort (*dollarweed) Pepperweed Pigweed Pineappleweed Plantain Poison ivy Poison oak Puncturevine Purslane Ragweed Red sorrel (*sheep sorrel) Shepherdspurse Spotted spurge Spurge	Sunflower Thistle Velvetleaf (*pie marker, Indian mallow) *Veronica* (*corn speedwell) Virginia buttonweed White clover (*Dutch clover, honeysuckle clover, white trefoil & purplewort) Wild carrot Wild garlic Wild geranium Wild lettuce Wild mustard Wild onion Wild strawberry Wild violet Yarrow Yellow rocket and many other broadleaf weeds
*Synonyms			

BROADCAST FOLIAR APPLICATIONS:

Spray Preparation - Add one-half of the required amount of water to the spray tank, then add slowly Gordon's Brushmaster® Herbicide with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

Noncropland including Barrier Strips, Farmyards, Fencerows, Firebreaks, Highway Rights-of-way, Industrial Sites, Municipal, State and Federal Lands, Railroad Rights-of-way, Recreation Areas, and Utility Rights-of-way.

Broadcast applications to annual and perennial weeds: Apply to emerged weeds. For best results, treat when weeds are young and actively growing.

The maximum application rate to general noncropland sites is 2.0 gallons of product per acre per application per site.

When multiple applications of up to 2.0 lbs. acid equivalent per acre are utilized to reach the maximum seasonal use rate, do not make a repeat application within 30 days of the previous application.

Minimum spray volume: Use 2 or more gallons of spray solution per acre.

Number of applications: Limited to 2 applications per year.

Broadcast applications to woody plants: Apply to trees and brush when foliage is fully expanded and plants are actively growing.

Up to 4.0 gallons of product per acre (4.0 lbs. acid equivalent per acre) may be applied in a single application to rights-of-way, including electrical power lines, communication lines, pipelines, highways and railroads that intersect wooded areas or stands of trees, brush and woody plants.

The maximum noncropland application rate for tree, brush and woody plant control is 4.0 gallons of product per acre per application per site.

Target species	Application schedule	*Maximum* application rate, Gallons of product per acre	*Maximum* application rate, Pounds of acid equivalent per acre per application	*Maximum* number of applications per year	*Minimum* days between applications	*Minimum* spray volume, gallons per acre
Annual and perennial weeds	Broadcast	2.0 gal/A	2.0 #/A	2	30 days	2
Woody plants	Broadcast and high volume foliar	4.0 gal/A	4.0 #/A	1	NA	See Tables 1-2.

High volume foliar applications (100-400 gallons per acre):
Apply 1.0-4.0 gallons of product per acre with adequate water or apply a 1.0-4.0% vol/vol spray solution as a full cover spray with high volume equipment. Use the lower spray concentrations in the range for susceptible species and use the higher spray concentrations within the range for hard-to-control species, for mature plants during the late summer or under adverse environmental conditions (e.g. drought).

Spray broadleaf weeds, woody plants or mixed brush uniformly and thoroughly by wetting all leaves, stems, bark and root collars. The total volume of spray solution required for adequate coverage of solid stands of mixed brush can range from 100-400 gallons of spray solution per treated acre. The spray preparation chart for applications on a spray-to-wet basis is shown below in Table 1.

Table 1. Instructions for preparing 100-400 gallons of spray solution at 1.0-4.0% spray concentration with water for high volume foliar applications.

Spray solution per acre, Gallons	Amount of Product Needed for Spray Concentration of:			
	1.0%	**1.3%**	**2.0%**	**4.0%**
12.5	1 pint	1 1/3 pints	1 quart	**2 quarts**
25	1 quart	1 1/3 quarts	2 quarts	**1 gal.**
50	2 quarts	2 2/3 quarts	4 quarts	**2 gal.**
75	3 quarts	3 1/3 quarts	1.5 gal.	**3 gal.**
100	1 gal.	1 1/3 gal.	2 gal.	**4 gal.**
200	2 gal.	2 2/3 gal.	**4 gal.**	----
300	3 gal.	**4 gal.**	----	----
400	**4 gal.**	----	----	----

Equal measures: 1gallon = 4 quarts= 8 pints= 128 fl. oz.

The maximum seasonal application rate for trees, brush and woody plant control is 4.0 gallons of product per acre per application per site.

For Backpack Sprayers, Knapsack Sprayers, And Hand-pressurized Pump Sprayers

Table 2. Instructions for preparing 1-3 gallons of spray solution at 1.0 -4.0% spray concentration with water for high volume foliar applications.

Gallons Of Water	Amount Of Product Needed for Spray Concentration of :			
	1.0%	**1.3%**	**2.0%**	**4.0%**
1	2.5 tablespoons	3.5 tablespoons	5 tablespoons	10 tablespoons
2	5 tablespoons	7 tablespoons	5 fl. oz.	10 fl. oz.
3	4 fl. oz.	5 fl. oz.	7.5 fl. oz.	15 fl. oz.

Equal measures: 1 fl. oz. = 2 Tablespoons (Tbs.) = 6 Teaspoons (tsp.)

Individual Plant Treatments:
BASAL, CUT SURFACE, AND FRILL APPLICATIONS:
Limitations for basal spray, frill, and cut surface (stump) treatments. Use only one basal spray, frill or cut surface application per year. Refer to the section for broadcast applications to woody plants for additional limitations and maximum rates.

Basal Bark Method - Apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed. Thorough coverage is required for all basal treatments. Spray volumes will depend upon the sizes, types and densities of brush present. Apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed.

Spray Preparation With Oil - Add one-half the required amount of diesel oil (No. 1 or No. 2 fuel oil) to the spray tank, then add Gordon's Brushmaster® Herbicide with agitation and complete filling the tank with diesel oil. Mix thoroughly and provide adequate agitation during mixing and spraying. Substitutes for diesel oil include mineral oil, kerosene, and oil blends formulated for basal bark applications. Penetrants appropriate for oil soluble herbicides may improve control.

For Backpack Sprayers, Knapsack Sprayers, and Hand Pump Sprayers - Mix 10.0 fluid ounces of Gordon's Brushmaster® Herbicide with 1.0 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or oil blends formulated for basal bark applications). Or use the equivalent spray concentration of 8.0% volume/volume.

Refer to Table 3 for additional spray preparation instructions with oil.

Table 3. Quick mix instructions for preparing 1 to 5 gallons of spray solutions with oil for basal bark, cut surface, and frill applications.

Spray Solution, Gallons	Amounts of Gordon's Brushmaster® Herbicide required, Fluid Ounces
1	10 (1¼ cups)
2	20 (1¼ pints)
3	30 ($1\frac{7}{8}$ pints)
5	50 ($3\frac{1}{8}$ pints)

Equal Measures: 8 fluid ounces = 1 cup; 16 fluid ounces = 1 pint

Cut Surface--Stump Treatment - This method is most effective and economical on stumps with diameters larger than 3 to 4 inches. This treatment can be applied throughout the year except when snow, ice, or water prevents thorough spray coverage.

For Backpack Sprayers, Knapsack Sprayers, and Hand Pump Sprayers - Mix 10.0 fluid ounces of Gordon's Brushmaster® Herbicide with 1.0 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or other oil blends formulated for basal applications). Refer to Table 2 for spray preparation.

Spray thoroughly the cut surfaces, bark, and exposed roots. Treat entire circumference of the tree. Drench until runoff to the soil surface is noticed.

Frill Treatment - This treatment is recommended for culling trees with trunk diameters greater than 5 to 6 inches. Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark but do not remove chips.
Mix 10.0 fluid ounces of Gordon's Brushmaster® Herbicide with 1.0 gallon of oil (diesel oil, No. 1. or No. 2 fuel oil, kerosene, mineral oil, or other oil blends formulated for basal applications). *Refer to Table 2 for spray preparation.* Spray or pour the spray mixture into the frills without runoff.

USE PRECAUTIONS FOR ALL METHODS OF APPLICATION:

- Do not apply this product through any type of irrigation system.
- Do not apply when temperatures exceed 85°F and humidity is high.

ORNAMENTAL LAWNS AND TURF (Cool Season Grasses Other Than Bentgrass):
Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

The best results will be obtained from spring or early fall applications when weeds have emerged and are actively growing. Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

USE PRECAUTIONS:
Avoid spray droplets onto vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants. Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present.
Use only lawn-type sprayers. Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other ornamental species. Do not apply to newly seeded grasses until well established. Do not spray when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application. Do not apply this product through any type of irrigation system.

Application Rates - Apply 4 to 6 pints of product in 20 to 260 gallons of water per acre (1.5 to 2.2 fluid ounces of product in 1 to 6 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

Limitations on 2,4-D applications to ornamental turfgrass			
Use Site	Maximum Rate per Application	Maximum Number of Applications per Year	Maximum 2,4-D Acid Equivalent Amount Applied per Year
Ornamental turfgrass	6 pints/A (0.8 lb 2,4-D ae/A)	2	1.6 lb 2,4-D ae/A
ae = Acid Equivalent. Do not exceed the maximum seasonal rate of 12 pints (1.6 lb 2,4-D ae) per acre per season, excluding spot treatments.			

Small Area Applications (Not Recommended For Hose End Sprayers) - For spot treatments and small areas, mix Gordon's Brushmaster® Herbicide at 1.5 fluid ounces per 1 gallon of water per 1,000 square feet or follow the recommendations for hand operated sprayers presented below. Spray emerged weeds that are actively growing at anytime of the season. On newly established lawns, apply Gordon's Brushmaster® Herbicide after the grass has been mowed at least 3 times. Do not water the lawn within 24 hours after application and observe use precautions.

Use Rates In Ornamental Lawns and Residential Turf With Hand Operated Sprayers			
Amount of Product		Amount of Water	Area to be Treated
3 Tablespoons	1.5 fluid ounces	1 Gallon	1,000 Square Feet
6 Tablespoons	3.0 fluid ounces	2 Gallons	2,000 Square Feet
9 Tablespoons	4.5 fluid ounces	3 Gallons	3,000 Square Feet

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: ____
- EPA Est. No. ____

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials.:

- A Brush and Broadleaf Herbicide for Noncropland and Turf
- Controls ash, aspen, bramble, kudzu, oak, willows, dandelion, chickweed, knotweed, plantain, henbit, spurge and other species of brush and broadleaf weeds.
- Controls multiflora rose, brambles, cedar, locust, poison oak, poison ivy, honeysuckle, thistle, kochia, kudzu, and many other trees, vines, and broadleaf weeds."
- Low volatile ester. Controls the toughest weeds in turf

3. Trademark acknowledgements

- GARLON® 4 Herbicide is a registered trademark of Dow AgroSciences, L.L.C.
- HY-GRADE I(TM) is a trademark of CWC Chemical, Inc.
- Arborchem Basal Oil is a product of Arborchem Products Co.
- Cide-Kick, Cide-Kick II, and JLB Oil Plus are products of JLB International Chemical, Inc.
- Androc Oil is a product of Habco, Inc.

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00774.20071105

2. Previous Version: AP081105

3. Reason for Issue: Various changes pertaining to re-registration. Re-format label.

Secondary Review of 2217-774

Since aerial and broadcast spray application to utility and highway rights of way include the following paragraph:

Add the paragraph:

16. Add the following statements to the labeling:

    Use of this product in certain portions of California, Oregon and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition, et al. v. EPA, C01-0132C, (W.D. WA). For further information, please refer to EPA Web Site: http://www.epa.gov/espp.