

2217-830

11/03/2008

1/5



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 3 2008

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

Dear Dr. Kunstman:

Subject: RED Label Amendment: 2,4-D, Dicamba and MCPP-p
EH 1378 Herbicide
EPA Registration Number: 2217-830

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 make the changes below:

1. Under Storage and Disposal section, change the first bullet to read "Pesticide Storage".
2. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

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,

A handwritten signature in cursive script that reads "Joanne I. Miller".

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

Enclosure

2/5

EH1378 HERBICIDE

EPA Reg. No. 2217-830

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

SHAKE WELL BEFORE USING

ACTIVE INGREDIENT:

Monosodium acid methanearsonate (CAS 2163-80-6)	9.81%
2,4-D, dimethylamine salt (CAS 2008-39-1)	3.18%
Mecoprop-p dimethylamine salt (CAS 66423-09-4)	1.60%
Dicamba, dimethylamine salt (CAS 2300-66-5)	0.79%
INERT INGREDIENTS:	84.62%
TOTAL.....	100.00%

THIS PRODUCT CONTAINS:

- Monosodium acid methanearsonate 9.81%. Total Arsenic (as elemental) all in water soluble form 4.54%.
- 2,4-dichlorophenoxyacetic acid equivalent 2.64%.
- (+)-(R)-2-(4-chloro-2-methylphenoxy) propanoic acid equivalent 1.32%.
- 3,6-dichloro-o-anisic acid equivalent 0.66%.

Isomer Specific by AOAC Methods

ACCEPTED
with COMMENTS
 In EPA Letter Dated:
NOV 3 2008
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-830

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt, long pants, socks, shoes, and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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. • Call a poison control center or doctor for treatment advice.



If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
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 mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.</p>	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters 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.

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 apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.
- Do not allow people or pets to enter the treated area until sprays have dried.

WHERE TO USE:

EH1378 Herbicide is intended for residential and ornamental lawns with applications by homeowners only. This product contains four proven herbicides that are effective on hard-to-kill grass and broadleaf weeds. Broadcast applications and spot treatments of this product may be applied after the weeds have emerged.

WEEDS CONTROLLED:

EH1378 Herbicide controls a wide range of broadleaf weeds including dandelion, spurge, oxalis, crabgrass, dallisgrass, and yellow nutsedge in bermudagrass, Kentucky bluegrass, perennial ryegrass, tall fescue, and zoysiagrass lawns. A partial list of weeds controlled is shown below.

PARTIAL LIST OF WEEDS CONTROLLED			
Aster	Dock	Nutsedge	Sheep sorrel
Bedstraw	Goosegrass	Oxalis	Shepherdspurse
Black medic	Ground ivy	Peppergrass	Speedwell
Buckhorn	Healall	Pigweed	Spurge
Burdock	Henbit	Plantain	Wild carrot
Chicory	Knotweed	Poison ivy	Wild garlic
Chickweed	Lambsquarters	Poison oak	Wild lettuce
Clovers	Lespedeza	Purslane	Wild onion
Crabgrass	Mallows	Ragweed	Yarrow
Dallisgrass	Morningglory	Sandbur	Yellow woodsorrel
Dandelion			

USE PRECAUTIONS:

- Do not exceed the specified dosage for any area.
- Turfgrass may be discolored temporarily. Do not use this product on St. Augustinegrass, centipedegrass, carpetgrass, creeping fescue, dichondra, nor on lawns with desirable clovers.
- Do not apply while grass is emerging from dormancy.
- Do not apply with hose-end applicators.
- Do not apply as a fine mist because of potential for injury to desirable plants.
- Do not use this product on or near desirable plants, including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs, since injury may result.
- Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day. Rinse applicator over lawn area only.

WHEN TO APPLY:

Apply when weeds are young and actively growing and the lawn is healthy, moist and not under stress from drought conditions. For bluegrass, perennial ryegrass, and tall fescue, apply this product when air temperatures are between 70°F and 80°F. For bermudagrass and zoysiagrass, apply this product when air temperatures are between 70°F and 90°F. Applications made when air temperatures exceed these conditions may result in injury to the lawn.

Do not apply this product to newly seeded lawns until after the fourth mowing. Seed can be sown 3 to 4 weeks after application.

HOW TO APPLY:

If the soil is dry, then water thoroughly 24 hours before application. Mow lawn to the proper height 1 to 3 days before application. Using a hand-operated sprayer (plunger or pump-up sprayer) spray weeds evenly until lightly covered. Over-spray can injure the turfgrass. Do not water lawns for 24 hours after application. Temporary discoloration may occur with the use of this product. After 24 hours, a thorough watering is recommended.

For Bermudagrass and Zoysiagrass: Mix 6 to 8 fluid ounces (12 to 16 tablespoons) of product with 2.0 gallons of water for treatment of 1,000 square feet of turfgrass. Do not apply when the air temperatures are above 90°F. A second application may be necessary.

Table 1. Mixing instructions for bermudagrass and zoysiagrass with hand operated sprayers.

Area to Spray, Square Feet	Amount of Water, Gallons	Amount of Product,	
		Tablespoons	Fluid Ounces
500	1	4 to 8	2 to 4
1,000	2	12 to 16	6 to 8
1,500	3	20 to 24	10 to 12

For Kentucky Bluegrass, Perennial Ryegrass, and Tall Fescue: Mix 4 to 6 fluid ounces (8 to 12 tablespoons) of product with 2.0 gallons of water for treating 1,000 square feet of turfgrass. Do not apply when the air temperatures are above 80°F. A second application may be necessary.

Table 2. Mixing instructions for Kentucky bluegrass, perennial ryegrass, and tall fescue with hand operated sprayers.

Area to Spray, Square Feet	Amount of Water, Gallons	Amount of Product,	
		Tablespoons	Fluid Ounces
500	1	3 to 6	1.5 to 3
1,000	2	8 to 12	4 to 6
1,500	3	14 to 18	7 to 9

5
5

Limitations on broadcast applications to residential turfgrass

The maximum application rate is 8.0 fl.oz. of product per 1,000 sq.ft. per application (0.65 lbs 2,4-D ae, 0.33 lb MCP-p ae and 0.16 lb dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 16.0 fl.oz. of product per 1,000 sq.ft. (1.3 lbs 2,4-D ae, 0.65 lb MCP-p ae and 0.33 lb dicamba ae per acre).

Limitations on spot treatments:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 8.0 fl.oz. per 1,000 sq.ft. per application (0.33 lbs MCP-p acid equivalent per acre).

STORAGE AND DISPOSAL

STORAGE: Store in original container in a locked storage area. Keep from freezing.

PESTICIDE DISPOSAL: **If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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 INCIDENTAL, 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.

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. _____

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00830.20080807.proposed.doc

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