

2217-833

3/10/2009

1/2



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

10 MAR 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

James Kuntsman
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 014090
Kansas City, Missouri 64101-0090

Subject: EPA Reg. 2217-833 / Speed Zone Broadleaf Herbicide response to 2,4-D RED Amendment letter.

The labeling is acceptable provided you make the following changes:

- 1) Change the first sentence of the Environmental Hazards statements to "This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants."
- 2) To page 7, delete "excluding spot treatments". Change "21 days" to "30 days" to comply with the MCPP RED.

Submit one copy of the revised final printed label for the record. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Sincerely,

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

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

2/12

SPEED ZONE BROADLEAF HERBICIDE

EPA Reg. No. 2217-833

ACTIVE INGREDIENT:

2,4-D, 2-ethylhexyl ester	28.57%
Mecoprop-p, acid	5.88%
Dicamba, acid	1.71%
Carfentrazone-ethyl	0.62%
INERT INGREDIENTS:.....	63.22%
TOTAL.....	100.00%

THIS PRODUCT CONTAINS:

- 1.53 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 18.95%.
- 0.48 lbs. (+)-R-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per gallon or 5.88%.
- 0.14 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 1.71%.
- 0.05 lbs. Ethyl α ,2-dichloro-5-[4(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]-4-fluorobenzenepropanoate per gallon or 0.62%

Isomer Specific by AOAC Methods.

Contains petroleum distillates

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

ACCEPTED
with COMMENTS
in EPA Letter Dated

10 MAR 2008

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

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.)

2217-833

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

PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

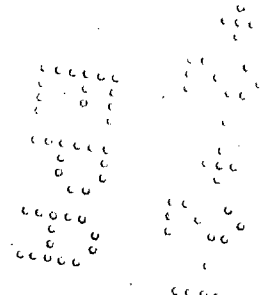
CAUTION: Causes moderate eye irritation. Harmful if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment

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 a EPA chemical resistance category selection chart.

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

- long-sleeved shirt and long pants,
- shoes and socks,



- chemical resistant gloves
- 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

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations	
	<ul style="list-style-type: none"> • 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 swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give any liquid to the person. • 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 on 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 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 information.</p>	
<p>NOTE TO PHYSICIAN: Contains petroleum distillates - vomiting may cause aspiration pneumonia.</p>	

Environmental Hazards

This pesticide may be toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. 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.

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 workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170.

This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment and restricted-entry interval. The requirements in this box only 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 to 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 worn over short-sleeved shirt and short pants,
- chemical-resistant footwear plus socks,
- chemical-resistant gloves made of any water-proof material,
- chemical-resistant headgear for overhead exposure and 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 for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Reentry Statement: Do not enter or allow people (or pets) to enter the treated area until sprays have dried.

PRODUCT DESCRIPTION: Speed Zone Broadleaf Herbicide contains four active ingredients including carfentrazone-ethyl that broaden the spectrum of weed control. Carfentrazone-ethyl is in the aryl triazolinone family and inhibits protoporphyrinogen oxidase (Protox), a pivotal enzyme in chlorophyll production.

Speed Zone Broadleaf Herbicide offers these advantages:

- Excellent postemergent activity with proven performance for broadleaf weed control in turfgrass.
- Superior cool weather performance.
- High selectivity (turfgrass safety) in established cool season turfgrass and warm season turfgrass.
- Good toxicological, environmental, and ecological properties compared to the standards.
- Carfentrazone-ethyl combinations provide rapid and effective weed control for common and troublesome weed species in turfgrass, e.g. spurge, pennywort (dollarweed), dandelion, and white clover.
- Fast acting with evidence of injury within hours. The speed of action (rate of phytotoxicity) and the early injury symptoms are unique features of carfentrazone-ethyl combinations. Generally, the injury

5/12

symptoms can be noticed within hours of the application and plant death can occur within 7 to 14 days.

SPRAY PREPARATION AND TANK MIXTURES:

Speed Zone Broadleaf Herbicide is an emulsifiable concentrate intended for dilution with water. In certain applications, liquid fertilizer may replace part of the water in the mixture.

Mixing with Water:

Add one-half the required amount of water to the spray tank, then add Speed Zone Broadleaf Herbicide slowly with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

This product forms an emulsion and can separate upon extended or prolonged standing. Re-agitate to assure uniformity of the spray mixture. Storage of the spray mixture beyond 72 hours is not recommended.

Do not use tank additives that alter the pH of the spray solution below pH 5 or above pH 8. Buffer the spray solution to alter the pH range as appropriate.

Mixing with Liquid Fertilizers:

Use suitable sources and rates of fertilizer based upon local recommendations. Refer to the mixing directions on the labels of the liquid fertilizers (e.g. UAN or urea solutions). Always perform a jar compatibility test before large scale mixing.

GROUND EQUIPMENT:

Power sprayers fitted with a boom or spray wand/gun may be used for broadcast applications and spot treatments. For best spray distribution and coverage, select a spray volume and delivery system that will ensure accurate and uniform coverage. Boom sprayers equipped with appropriate flat fan nozzles, tips, and screens are suitable for broadcast applications. Do not use flood nozzles, Raindrop®, or nozzle tips larger than 8008. Spray droplets larger than 400 microns may reduce coverage and subsequent loss in weed control.

Spray volumes of 3 to 175 gallons per acre with spray pressures adjusted to 20 to 40 psi are appropriate. Use higher spray volumes for dense weed populations.

Hand operated sprayers including backpack sprayers, compression sprayers, and knapsack sprayers are appropriate for small turfgrass areas when power equipment is unavailable, uneconomical, or impractical.

Hand-held techniques: Wands fitted with flat fan nozzle tips may be used with the appropriate technique. Flat fan nozzles should not be waved in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead the nozzle should be held stationary at the proper height. Side-to-side motions result in uneven coverage.

This product may cause injury to susceptible/nontarget plants at the use site by contacting the foliage, stems, or roots. To prevent injury to susceptible crops and other desirable broadleaf plants including but not limited to cotton, legumes, tobacco, tomatoes, garden/vegetable crops, and ornamentals (flowers, trees, and shrubs) avoid contact with the spray solution, spray droplets, and spray mist (fine droplets).

After using this product, clean sprayer with soap or detergent and water, or an approved spray tank cleaner and rinse thoroughly before applying other pesticides.

Spray Drift Management

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

Droplet Size

Use only Medium or coarser spray nozzles according to ASAE (S 572) definition of standard nozzles or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 10 mph. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind.

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.

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

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

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.

WHERE TO USE:

Speed Zone Broadleaf Herbicide provides selective broadleaf control in warm season and cool season turfgrass in five (5) use sites.

- Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations including, but not limited to hospitals, nursing homes, schools, museums, libraries, sport facilities, golf courses (fairways, aprons, and roughs) , and office buildings.
- Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial and institutional buildings, recreation areas, fairgrounds, and areas adjacent to athletic fields.
- Residential/domestic sites are defined as areas associated with the household or home life-including; but not limited to apartment complexes, condominiums, and patient care areas of nursing homes, mental institutions, hospitals, or convalescent homes.
- Agricultural site: Commercial sod production
- Noncropland Sites: Highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadsides, roadside ditches, road shoulders, road embankments, dividers, and medians. Municipal, state, and federal lands: Airports and military installations.

Prohibitions of 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.
- Do not apply this product to bentgrass greens, St. Augustinegrass, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.

APPLICATION SCHEDULES:

Early postemergent applications of Speed Zone Broadleaf Herbicide are recommended for annual, biennial, and perennial weeds. Apply Speed Zone Broadleaf Herbicide to broadleaf weeds that are young and actively growing for the best results. Speed Zone Broadleaf Herbicide combines a contact herbicide with systemic herbicides and provides little or no residual activity at recommended use rates.

Speed Zone Broadleaf Herbicide may be applied as a single broadcast application or as a split/sequential broadcast applications in the spring, summer, or fall. Spring and fall treatments under adequate soil moisture conditions are preferred to the summer treatments. Generally, summer broadcast applications to older, drought stressed weeds are less effective.

Sequential broadcast applications or follow-up applications as spot treatments with a minimum of 30 days between applications are recommended for more mature weeds, for dense infestations, and for adverse environmental conditions.

Spot treatments during the summer may be appropriate for sparse infestations, or as a follow-up treatment anytime broadleaf weeds are susceptible. Apply on a spray-to-wet basis for the best results.

Extremes in environmental conditions e.g. temperature and moisture, soil conditions, and cultural practices may affect the activity of Speed Zone Broadleaf Herbicide. Under warm moist conditions, herbicide symptoms may be accelerated. While under very dry conditions, the expression of herbicide symptoms is delayed, and weeds hardened off by drought are less susceptible to Speed Zone Broadleaf Herbicide.

For newly seeded areas:

- The application of Speed Zone Broadleaf Herbicide to grass seedlings is recommended after the second mowing.

Reseeding interval:

- Treated areas may be reseeded 1 week after application.

For newly sodded, sprigged, or plugged areas:

- The application of Speed Zone Broadleaf Herbicide to newly sodded, sprigged, or plugged grasses should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations.

For dormant turf:

- Applications to fully dormant bermudagrass, fully dormant zoysiagrass, and fully dormant buffalograss are suggested.

Prohibitions for application schedules:

- Do not broadcast apply when air temperatures exceed 90°F; some injury may be expected with spot treatments when air temperatures exceed 90°F.

USE RATES AND SPRAY VOLUMES FOR TURFGRASS:

Generally, the lower application rates within the specified range will provide satisfactory control of sensitive weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds beyond the appropriate growth stages.

Use rates and spray volumes of Speed Zone Broadleaf Herbicide as a broadcast treatment for use on turfgrass are presented in Table 1.

TABLE 1. RATES FOR SOD FARMS, ORNAMENTAL LAWNS AND TURFGRASS				
Species	Amount of Product, Pints/Acre	Recommended Spray Volume, Gallons/Acre	Amount of Product, fl.oz./1,000 sq. ft.	Spray Volume, Gallons per 1,000 sq.ft.
Cool-Season Turf				
Kentucky bluegrass, annual bluegrass, annual ryegrass, perennial ryegrass, tall fescue, red or fine leaf fescues, creeping bentgrass, colonial bentgrass (excluding golf greens)	3.0 to 5.0	3 to 175	1.1 to 1.8	0.1 to 4.0
Mixtures of cool-season species in noncropland areas established for aesthetic purposes	3.0 to 5.0	3 to 175	1.1 to 1.8	0.1 to 4.0
Mixtures of cool-season species in noncropland areas established for roadside vegetation management or for low maintenance. (Kentucky bluegrass, tall fescue, smooth bromegrass, and orchardgrass)	3.0 to 5.0	3 to 175	1.1 to 1.8	0.1 to 4.0
Warm-Season Turf				
Common bermudagrass, hybrid bermudagrass, zoysiagrass and buffalograss	2 to 4	3 to 175	0.75 to 1.5	0.1 to 4.0
<ul style="list-style-type: none"> • For Warm-Season turf, lower rates listed above should be used in warmer temperatures (above 80°F). • Maximum control of weeds will be obtained with early to mid-spring or mid- to late-fall applications. 				
Turfgrass tolerance: The turfgrass tolerance to Speed Zone Broadleaf Herbicide may vary and temporary turfgrass yellowing may occur on certain varieties of hybrid bermudagrass. Environmental conditions and certain spray tank additives (e.g., adjuvants, wetting agents, surfactants), liquid fertilizers, and tank mixtures containing other emulsifiable concentrates may reduce the selectivity on the turfgrass.				
For dormant turf: Applications to fully dormant bermudagrass, fully dormant zoysiagrass, and fully dormant buffalograss are suggested. Avoid applications during winter-to-spring and fall-to-winter transition periods.				

Limitations on broadcast treatments for ornamental turfgrass and sod farms:

The maximum application rate is 5.0 pints of product per acre per application (1.0 lbs 2,4-D ae, 0.30 lb MCP-p ae, and 0.09 lb dicamba ae per acre per application), ~~excluding spot treatments.~~

For ornamental turfgrass, the maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. For sod farms, the maximum number of broadcast applications is limited to 2 per year with a minimum of 21 days between applications. The maximum seasonal rate is 10.0 pints of product per acre per year (2.0 lbs 2,4-D ae, 0.60 lb MCP-p ae, and 0.18 lb dicamba ae per acre), excluding spot treatments.

SPOT TREATMENTS WITH HAND OPERATED SPRAYERS (INCLUDING BACKPACK SPRAYERS, COMPRESSION SPRAYERS, AND KNAPSACK SPRAYERS):

- **For Cool-Season Turfgrass:** Mix 1.1 to 1.8 fl.oz. of Speed Zone Broadleaf Herbicide per one (1.0) gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. Apply any time the emerged broadleaf weeds are susceptible. Spray the target weeds thoroughly and wet the entire leaf surface of the undesirable plants.
- **For Warm-Season Turfgrass:** Mix 0.75 to 1.5 fl.oz. of Speed Zone Broadleaf Herbicide per one (1.0) gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. Apply any time the emerged broadleaf weeds are susceptible. Spray the target weeds thoroughly and wet the entire leaf surface of the undesirable plants. For warm-season turf, lower rates listed above should be used in warmer temperatures (above 80°F).

Limitations on spot treatments to residential turfgrass:

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 1.8 fl.oz. per 1,000 sq.ft. per application (0.3 lb MCP-P acid equivalent per acre). The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

Hand-held techniques: Wands fitted with flat fan nozzle tips may be used with the appropriate technique. Flat fan nozzles should not be waved in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead the nozzle should be held stationary at the proper height. Side-to-side motions result in uneven coverage.

Speed Zone Broadleaf Herbicide may be tank mixed with other herbicides EPA-registered for use on turfgrass to broaden the weed control spectrum compared to the products alone. These tank mixtures must be used according to the most restrictive label limitations and precautions. No label dosage rate should be exceeded. Follow the labeling of each companion product for precautionary statements, directions for use, dosage rates, and application schedules. Tank mixture recommendations are for use only in states where the companion products and application site are registered.

CULTURAL TIPS FOR IMPROVED CONTROL:

Irrigation:

- Do not apply this product through any type of irrigation system.
- Do not apply this product immediately before rainfall or irrigation.
- **Rainfast period:** Rainfall or irrigation occurring within 3 to 4 hours after application of this product may reduce the effectiveness.

Mowing:

- Delay mowing 1 to 2 days before and after the application of this product.

BROADLEAF WEEDS CONTROLLED:

Speed Zone Broadleaf Herbicide will control or suppress the following broadleaf weeds and will control or suppress other broadleaf weeds that are susceptible to 2,4-D.

BROADLEAF WEEDS			
Annual fleabane	Dogfennel	Poison ivy	Roundleaf greenbriar
Aster, white heath & white prairie	Dovefoot geranium	Poison oak	Shepherdspurse
Bedstraw	English daisy	Puncturevine	Spotted spurge
Beggarticks	False dandelion (*spotted catsear & common catsear)	Purple cudweed	Spurge
Beggarweed, creeping	Field bindweed	Purslane	Star of Bethlehem**
Bindweed	(*morningglory & creeping jenny)	Ragweed	Sunflower
Birdsfoot trefoil	Field madder	Redweed	Thistle
Black medic	Field oxeye-daisy (*creeping oxeye)	Red sorrel (*sheep sorrel)	Velvetleaf (*buttonweed)
Broadleaf plantain	Field pennycress	Knotweed	Venice mallow
Buckhorn plantain		Lambsquarters	Veronica (*corn speedwell)
Bull thistle		Lawn burweed	Virginia buttonweed
Burclover		Lespedeza, common	Virginia creeper
		Lesser celandine	Western salsify

BROADLEAF WEEDS			
Burdock, common	Filaree, whitestem & redstem	Mallow, common	White clover (*Dutch clover, honeysuckle clover, white trefoil, & purplewort)
Buttercup, creeping	Florida pusley	Matchweed	Wild carrot
Carolina geranium	Ground ivy	Mouseear chickweed	Wild garlic
Carpetweed	Groundsel	Mustard	Wild geranium
Chickweed, common	Hairy bittercress	Nettle	Wild lettuce
Chicory	Hawkweed	Old world diamond flower	Wild mustard
Cinquefoil	Healall	Oxalis (*yellow woodsorrel & creeping woodsorrel)	Wild onion
Clover	Henbit	Parsley-piert	Wild strawberry
Cocklebur	Horsenettle	Pennsylvania smartweed	Wild violet
Common mullien	Horseweed	Pennywort (*dollarweed)	Yarrow
Compassplant	Innocence (Blue-eyed Mary)	Pepperweed	Yellow rocket
Curly dock	Jimsonweed	Pigweed	and many other broadleaf weeds
Dandelion	Kochia	Pineappleweed	
Dayflower		Plantain	
Deadnettle			
Dock			
*Synonyms			
**Use higher rates for best results			

STORAGE AND DISPOSAL

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

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

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 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. **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.

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 <http://www.epa.gov/espp/wtc/>.

LIMITED WARRANTY AND DISCLAIMER

IMPORTANT: Read this LIMITED WARRANTY AND DISCLAIMER before buying or using this product. By opening and using this product, buyer and all users agree to accept the terms of this LIMITED WARRANTY AND DISCLAIMER in their entirety and without exception. If the terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full.

It is impossible to eliminate all risks inherently associated with use of this product. Damage to the treated article, ineffectiveness, or other unintended consequences can result from use of the product under abnormal conditions such as weather, presence of other materials, or the manner or use of application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING**

AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS. Buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

The manufacturer warrants only that this product conforms to the chemical description given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use, subject to the inherent risks described below. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER 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, LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OF HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. 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 THE PRODUCT. The Manufacturer must be promptly notified in writing of any claims, whether based in contract, tort, negligence, strict liability, or otherwise, to be eligible to receive either remedy stated above.

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. No employee or agent of the manufacturer or seller is authorized to vary or exceed the terms of this LIMITED WARRANTY AND DISCLAIMER in any manner.

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:

- Rainfast in as little as 3 hours
- Rainfast [Rainproof] in 3 hours
- Visible results in just 24 hours
- Visible results in as little as 24 hours
- Clover control in as little as one week
- Proven cool-weather performance
- Consistently fast control on tough weeds like clover, plantain, ground ivy and spurge [various other listed weeds].
- [This product] Smokes weeds, fast
- From the makers of Trimec® herbicides.
- For information call XXX-XXX-XXXX [contact www.xxx-xxxx.com]
- Speed Zone Broadleaf Herbicide provides rapid and effective weed control including white clover, dandelion, ground ivy and spurge in turfgrass.
- Fast-acting, cool-weather performance with visible effects within hours

- Reseed in 1 week
- High selectivity (turfgrass safety) in established cool and warm-season turfgrass.
- Sites include lawns, golf courses, sod farms, roadsides and many other turf sites

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00833.20090128.proposed.doc

2. Reason for Issue: 2nd response to EPA comments