



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

May 22, 2025

Eric D. Smith  
Director, Regulatory Affairs  
PBI/Gordon Corporation  
P.O. Box 860350  
Shawnee, KS 66286

Subject: Label Amendment - Registration Review Mitigation for Carfentrazone-ethyl, MCPP, & MCPA  
EPA Registration Number: 2217-865  
Product Name: EH 1404 HERBICIDE  
Application Dates: May 1, 2018; January 8, 2021; July 5, 2022; & January 30, 2024  
Decision Numbers: 569438, 597054, & 597055  
Case Numbers: 474862

Dear Eric D. Smith:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Carfentrazone-ethyl, MCPP, & MCPA Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Caleb Carr by phone at 202-566-0636, or via email at [carr.caleb@epa.gov](mailto:carr.caleb@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

ENCLOSURE: Stamped label

# EH 1404 HERBICIDE

## EPA Reg. No. 2217-865

For Home Lawns Only

### ACTIVE INGREDIENTS:

MCPA, 2-ethylhexyl ester .....	0.3370%
Mecoprop-p acid .....	0.0660%
Dicamba acid .....	0.0180%
Carfentrazone-ethyl .....	0.0023%
OTHER INGREDIENTS: .....	<u>99.5767%</u>
TOTAL .....	100.0000%

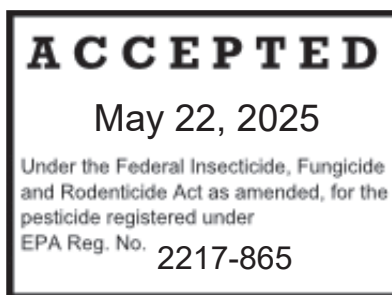
### THIS PRODUCT CONTAINS:

2-methyl-4-chlorophenoxyacetic acid equivalent, 0.2160%  
TRIMEC® is a registered trademark of PBI/Gordon Corporation.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

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



See attached booklet [inside pages] for complete Precautionary Statements and Directions for Use, including First Aid and Storage and Disposal.

**Net Contents:** \_\_\_\_  
**EPA Est. No.** \_\_\_\_

**Company Name and Address:**  
PBI/Gordon Corporation  
P.O. Box 860350  
Shawnee, Kansas 66286



## **PRECAUTIONARY STATEMENTS**

### **Hazards to Humans and Domestic Animals**

**CAUTION:** Causes moderate eye irritation. Harmful if absorbed through the skin. Avoid contact with eyes, skin, or clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, using tobacco, or using the toilet.

<b>First Aid</b>	
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>• 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.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or on clothing:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
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 information.	

### **Environmental Hazards**

This pesticide may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

**Groundwater Advisory:** This product is known to leach through soil into groundwater under certain conditions as a result of label use. This product may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

**Surface Water Advisory:** This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having a high potential for reaching surface water via runoff for several months or more after application.

**Fish Advisory Statement:** This product may be hazardous to aquatic organisms, particularly in clear, shallow water bodies that are adjacent to treated areas. Transport to water by runoff or spray drift of this product in areas where surface water is present, or intertidal areas below the mean high water mark, should be avoided. Do not contaminate water when disposing of equipment wash water or rinsate.

**Non-target Organism Advisory Statement:** This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by minimizing spray drift.

## **DIRECTIONS FOR USE**

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

### **1. Product Description**

EH 1404 Herbicide contains four active ingredients including carfentrazone-ethyl that broaden the spectrum of weed control. EH 1404 Herbicide offers these advantages:

- Excellent postemergent activity with proven performance for broadleaf weed control in turfgrass.

- Superior cool weather performance.
- Rapid and effective weed control for common and troublesome weed species in turfgrass, e.g. spurge, pennywort (dollarweed), dandelion, and white clover.
- Injury to weeds can be noticed within hours of the application and plant death can occur within 7 to 14 days.

## 2. Use Restrictions

- Only use for sites, pests, and application methods specified on this labeling.
- 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.
- Not for use on turf being grown for sale or other commercial use on sod, or for commercial seed production, or for research purposes.
- Do not apply this product to bentgrass, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.
- Do not apply to 'Floritam' St. Augustinegrass grown in Florida.
- Do not allow spray to contact vegetables, flowers or ornamentals as injury may result.
- Do not apply more than 1 gallon of product per 1,000 sq.ft. per application. [(0.78 lb MCPA ae, 0.24 lb MCPP-p ae, 0.07 lb dicamba ae, and 0.008 carfentrazone ai per acre per application)]
- Do not apply more than 2 gallons of product per 1,000 sq.ft. per year. [(1.57 lb MCPA ae, 0.48 lb MCPP-p ae, 0.13 lb dicamba ae, and 0.017 carfentrazone ai per acre per year)]
- Do not apply more than 3.0 lbs acid equivalent MCPA per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 30 days.
- Do not apply as a fine mist because of potential for injury to desirable plants.
- 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.

## 3. Where To Use

**On Lawns:** Use to spot treat broadleaf weeds commonly found in cool season and warm season grasses such as: Kentucky bluegrass, Perennial ryegrass, Tall fescue, Red or fine leaf fescues, Mixtures of cool season species, Common bermudagrass, Hybrid bermudagrass, St. Augustinegrass (excluding 'Floritam'), Zoysiagrass

## 4. When To Use

For best results, treat weeds in the spring and the fall when weeds are actively growing. However, this product is effective any time during the growing season.

- Do not apply when air temperatures are above 85°F as lawn injury can occur.
- Hard-to-kill weeds may require a repeat application in 3 weeks.
- Do not water lawn within 12 hours of application. If rainfall occurs within 12 hours after application, retreatment may be necessary.
- Do not apply to newly seeded lawns until after the second mowing.
- Delay application to newly sodded, plugged, or sprigged lawns until new grass has been mowed four times.
- Treated areas may be reseeded 2 weeks after application.
- Applications to dormant bermudagrass, zoysiagrass, and St. Augustinegrass may be used to control actively growing broadleaf weeds.

## 5. How To Apply

**[For Containers with Trigger Sprayers:]** EH 1404 Herbicide is ready-to-use and is applied directly from the container fitted with the trigger sprayer. Shake the container well. Direct the spray to the target weeds

to provide uniform coverage of the upper leaf surfaces. Apply to the point of runoff only. Excessive spraying can injure lawns.

**[For Refill Containers:]** EH 1404 Herbicide is ready-to-use and is applied directly from the container. Remove the cap and attach the trigger sprayer. Direct the spray to the target weeds to provide uniform coverage of the upper leaf surfaces. Apply to the point of runoff only. Excessive spraying can injure lawns.

**[Trigger Sprayer Instruction for Operation and Care:**

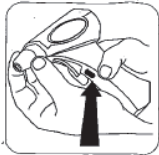
1. Remove sprayer from bag.
2. Shake the container well.
3. Unscrew cap from the bottle, and remove the foil seal.
4. Making sure that the tube is properly inserted through hole in cap, insert tube into bottle and screw on cap.
5. Open spray nozzle approximately one full turn.
6. TO PRIME - With sprayer directed at the target area, operate trigger until spray begins (approximately 10 to 15 times).
7. Adjust the spray nozzle for desired spray pattern
8. To store, turn nozzle to "OFF" position and store with trigger head above level of liquid in container to prevent leakage.]

**[Optional For Use with EZ Sprayer]**

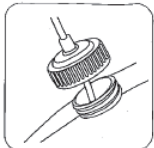
[EZ Connect Sprayer [Sprayer directions]

- Remove sprayer. Pull cord ALL THE WAY OUT.
- Remove top from cap on bottle.
- Insert (color) plug into spout on cap until it clicks.
- Twist nozzle on sprayer to the spray position.]

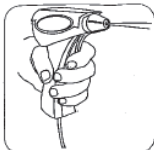
**[Battery Powered Sprayer Directions]**



- Remove Sprayer from storage holster.
- Slide safety lock to the LOCK position.



- Unwind pickup tube on the sprayer before attaching to the bottle.
- Insert pickup tube in bottle and screw sprayer cap onto bottle.



- Slide safety lock on the ON position.
- Gently squeeze the trigger to dispense fluid. The sprayer may require several seconds for the fluid to prime.
- After use, return to the LOCK position.

**[Sprayer Directions**

- Remove sprayer wand from the holster and pull sprayer cord ALL THE WAY OUT.
- Cut cable tie which holds pump handle.
- Rotate pump handle clockwise to unlock.
- Pump handle until pressure has built up in container.
- Squeeze lever on sprayer wand to spray product.
- Push handle down, rotate counterclockwise to lock in place.]

**[Wand] [Battery powered] Sprayer directions**

- 1). Remove sprayer from holster, [stretch out the hose all the way out.]

- 2). [Remove the flat cover; Insert [color] plug into spout on cap until it clicks.] [Insert pickup tube in bottle and screw sprayer cap onto bottle]
- 3). Rotate lance from storage position to spraying position.
- 4). [Remove insulation strip;] slide safety lock to unlock position.
- 5). Point spray nozzle at target area and press trigger to spray.

#### After Use

- 1). Slide safety switch to LOCK position.
- 2). Rotate lance to storage status, Return Sprayer to holster for storage]

## 6. Broadleaf Weeds Controlled [217]

EH 1404 Herbicide will control or suppress the following broadleaf weeds:

Annual yellow sweetclover	Cockle	Hoary cress
Aster	Cocklebur	Innocence (Blue-eyed Mary)
Aster, white prairie	Cocklebur, Oriental	Jimsonweed
Aster, heath	Cocklebur, spiny	Knawel
Aster, wild	Common mullein	Knotweed, prostrate
Austrian fieldcress	Compassplant	Kochia
Bedstraw	Creeping Jenny (Creeping Charlie)	Lambsquarters
Bedstraw, catchweed	Cudweed	Lespedeza
Bedstraw, pineywoods	Cudweed, purple	Lespedeza, common
Beggarticks	Daisy, English	Mallow
Beggarweed, creeping	Daisy, oxeye	Mallow, common
Betony, Florida	Dandelion	Matchweed
Bindweed	Dayflower	Mexicanweed
Bindweed, field	Dichondra	Morningglory
Bindweed, hedge	Dock	Morningglory, woolly
Bitter wintercress	Dock, broadleaf	Mugwort
Bittercress, hairy	Dock, curly	Mustard
Bitterweed	Dock, smooth	Mustard, black
Black medic	Dogbane	Mustard, hedge
Black-eyed Susan	Dogfennel	Mustard, tansy
Bloodflower milkweed	Dollarweed	Mustard, tumble
Blue lettuce	Elderberry	Mustard, white
Brassbuttons	False dandelion (*spotted catsear & common catsear)	Mustard, wild
Bristly ox tongue	Falseflax	Nettle
Broomweed	Fiddleneck	Nettle, bull
Burclover	Filaree, redstem	Nettle, burning
Burdock	Filaree, whitestem	Nettle, dead
Burweed	Fleabane, daisy	Nettle, horse
Buttercup	Fleabane, hairy	Nettle, stinging
Buttercup, bulbous	Fleabane, rough	Nettle, tall
Buttercup, creeping	Florida pusley	Old world diamond flower
Carolina geranium	Frenchweed	Oxalis (*yellow woodsorrel & creeping woodsorrel)
Carpetweed	Galinsoga	Parsley-piert
Catnip	Galinsoga, smallflower	Parsnip
Chickweed, common	Goathead	Pearlwort
Chickweed, mouseear	Goldenrod	Pennsylvania smartweed
Chicory	Ground ivy	Pennycress
Cinquefoil	Groundsel	Pennywort (*dollarweed)
Cinquefoil, rough	Gumweed	Peppergrass (pepperweed)
Clover	Hawkweed	Pigweed
Clover, crimson	Hawkweed, orange	Pigweed, prostrate
Clover, hop	Healall	Pigweed, redroot
Clover, red	Heartleaf drymary	Pigweed, Russian
Clover, strawberry	Hemp	Pigweed, smooth
Clover, sweet	Henbit	Pigweed, tumble
Clover, white		

Pineappleweed	Spiny amaranth	Virginia buttonweed
Plains coreopsis (tickseed)	Spurge, prostrate	Virginia creeper
Plantain	Spurge, spotted	Virginia pepperweed
Plantain, blackseed	Spurweed	Water pennywort
Plantain, bracted	Strawberry, India mock	Wavyleaf bullthistle
Plantain, broadleaf	Sunflower, false	Western clematis
Plantain, buckhorn	Sunflower, prairie	Western salsify
Plantain, hoary	Tansy ragwort	Wild buckwheat
Plantain, narrowleaf	Tanweed	Wild carrot
Plantain, slender	Thistle	Wild four-o'clock
Plantain, woolly	Thistle, blessed	Wild garlic
Poison ivy	Thistle, bull	Wild geranium
Poison oak	Thistle, Canada	Wild lettuce
Pokeweed	Thistle, musk	Wild marigold
Poorjoe	Thistle, Russian	Wild onion
Prickly lettuce	Thistle, Scotch	Wild parsnip
Prickly sida	Trailing crownvetch	Wild radish
Puncturevine	Velvetleaf	Wild rape
Purslane	Venice mallow	Wild strawberry
Purslane, common	Veronica (*corn speedwell)	Wild sweet potato
Ragweed	Vervain, blue	Wild violet
Red sorrel (*sheep sorrel)	Vervain, hoary	Woolly croton
Redweed	Vervain, prostrate	Wormseed
Scarlet pimpernel	Vervain, tall	Yarrow
Shepherd's purse	Vetch, bird	Yellow rocket
Sowthistle	Vetch, milk	Yellowflower pepperweed
Sowthistle, spiny	Vetch, narrowleaf	
Spanish needles	Vetch, wild	

## STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Keep from freezing. Store in original container in an area inaccessible to children and pets.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. **If empty:** 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. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:**

#### **Herbicide Benefit Claims:**

- Visible results in just 24 hours
- See results in hours
- Clover control in as little as one week
- Proven cool-weather performance
- Performs in both warm and cool weather
- Consistently fast control on tough weeds like clover, plantain, ground ivy and spurge [various other listed weeds].
- DEAD WEEDS...FAST
- Kills 200+ Broadleaf Weeds as listed
- For Northern and Southern grasses

#### **General Marketing Claims:**

- Rainfast in as little as 3 hours
- Rainfast [Rainproof] in 3 hours
- Reseed in 2 weeks
- For information call XXX-XXX-XXXX [contact [www.xxx-xxxx.com](http://www.xxx-xxxx.com)]
- Won't harm lawn grass [when used as directed]
- FOR HOME LAWNS ONLY
- consumer.pbigordon.com
- Manufactured in the U.S.A
- Convenient Pump & Spray Bottle
- Store and transport in an upright position
- Buyers guarantee limited to label claims
- Easy to use [battery] power sprayer
- Includes [battery] powered sprayer
- [Use with] [battery] powered sprayer
- Includes [Easy to use] Wand [Battery powered] sprayer

<b>WHAT IT'S FOR:</b>	<ul style="list-style-type: none"><li>• Use on home lawns</li><li>• Rapid and effective control of common and troublesome broadleaf weeds as listed</li></ul>
<b>WHERE TO USE:</b>	<ul style="list-style-type: none"><li>• Kentucky bluegrass, Perennial ryegrass, Fescues, Bermudagrass, Zoysiagrass</li></ul>
<b>AMOUNT TO USE:</b>	<ul style="list-style-type: none"><li>• Ready-to-use and is applied directly from the container.</li><li>• Refer to complete instructions in Directions for Use section of this booklet</li></ul>
<b>QUESTIONS:</b>	<ul style="list-style-type: none"><li>• For frequently asked questions, visit our website at consumer.pbigordon.com</li></ul>

## **DOCUMENT CONTROL INFORMATION**

**1. Unique Label Identifier:** 002217-00865.20250123.amend-proposed-clean

**2. Reason for Issue:** Comments from MCPP-p, MCPA, and Carfentrazone-ethyl Interim Registration Review Decision. Also merges previously acknowledged label notifications.

<b>Internal Usage Notes</b>
Associated Container Label: SpeedZone Ready To Use Lawn Weed Killer; Supplemental Distributors