UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 5, 2023

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

Subject: Registration Review Label Mitigation for Sulfentrazone and MCPP
Product Name: EH-1405 HERBICIDE
EPA Registration Number: 2217-866
Application Dates: May 10, 2019 and January 8, 2021
Decision Numbers: 591069, 591068

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 Sulfentrazone and MCPP 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.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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 DeMariah Koger by phone at (202)-566-2288, or via email at koger.demariah@epa.gov.

Sincerely,

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

Enclosure

2,4-D MECOPROP-P DICAMBA	GROUP	4	HERBICIDE
SULFENTRAZONE	GROUP	14	HERBICIDE

EH-1405 HERBICIDE

EPA Reg. No. 2217-866

For use by individuals/firms licensed or registered by the State to apply pesticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the pest control regulatory agency of your State prior to use of this product.

ACTIVE INGREDIENT:

2,4-D, dimethylamine salt	32.88%
Mecoprop-p, dimethylamine salt	15.13%
Dicamba, dimethylamine salt	5.36%
Sulfentrazone	1.24%
INERT INGREDIENTS:	45.39%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

2.69 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 27.40 %
1.23 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 12.50%
0.44 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 4.47%
0.12 lb N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]methanesulfonamide per gallon or 1.24%

Isomer Specific by AOAC Method.
TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

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 some one to explain it to you in detail.)

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

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.

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

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:	• 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 do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information. **NOTE TO PHYSICIAN**: Probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Harmful if absorbed through skin or if swallowed. Avoid contact with skin.

Personal Protective Equipment (PPE)

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

- protective eyewear,
- long-sleeved shirt and long pants,
- shoes and socks,
- chemical-resistant gloves made of any waterproof material and
- 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. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

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

- 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.

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 plants, and 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.

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.

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,
- 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:

EH-1405 Herbicide contains four active ingredients including sulfentrazone that broaden the spectrum of weed control. These combined herbicides provide limited residual activity at recommended use rates. Sulfentrazone is in the aryl triazolinone family and inhibits protoporphyrinogen oxidase (Protox), a pivotal enzyme in chlorophyll production. Without this key enzyme, a build-up of peroxide-like compounds occur, thus causing the plant cell membranes of weeds to rupture.

EH-1405 Herbicide offers these advantages:

- Excellent postemergent activity with proven performance for broadleaf weed control in turfgrass.
- This product exhibits improved cool-weather performance compared to standard “3-way amines”.
- High selectivity (turfgrass safety) in established cool-season turfgrass and warm-season turfgrass.
- Sulfentrazone combinations provides rapid and effective weed control for common and troublesome (tough) weed species in turfgrass, including: dandelion, spurge, white clover and dollarweed (pennywort).
- The speed of action (rate of weed phytotoxicity) and the early weed symptoms are features of Sulfentrazone combinations compared to standard “3-way amines”. Often, the weed injury symptoms can be noticed within hours of the application and plant death can occur within 10 to 14 days.
- This product is generally rainfast in as little as 6 hours.

USE RESTRICTIONS:

- The maximum single application rate for EH-1405 Herbicide to ornamental turfgrass and sod farms is 2.1 pints of product per acre per application, the equivalent of 0.70 lb 2,4-D ae, 0.32 lb MCPP-p ae, 0.12 lb dicamba ae, and 0.03 lb sulfentrazone ai per acre per application.
- The maximum annual application rate for EH-1405 Herbicide to ornamental turfgrass and sod farms is 4.2 pints of product per acre per year, the equivalent of 1.42 lb 2,4-D ae, 0.64 lb MCPP-p ae, 0.24 lb dicamba ae, and 0.06 lb sulfentrazone ai per acre per year.
- The maximum single application rate for EH-1405 Herbicide to non-cropland roadsides and rights-of-way is 2.5 pints of product per acre per application, the equivalent of 0.84 lb 2,4-D ae, 0.38 lb MCPP-p ae, 0.14 lb dicamba ae, and 0.04 lb sulfentrazone ai per acre per application.
- The maximum annual application rate for EH-1405 Herbicide to non-cropland roadsides and rights-of-way is 5 pints of product per acre per year, the equivalent of 1.68 lb 2,4-D ae, 0.76 lb MCPP-p ae, 0.28 lb dicamba ae, and 0.08 lb sulfentrazone ai per acre per year.
- The maximum number of broadcast applications for commercial sod farms is limited to 2 per year with a minimum of 21 days between applications.
- The maximum number of broadcast applications for ornamental turf is limited to 2 per year with a minimum of 30 days between applications.
- Do not apply this product to bentgrass greens or tees, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.
- Do not broadcast apply this product when temperatures are above 90°F, some injury may be expected with spot treatments when air temperatures exceed 90°F.
- Do not use tank mixture combinations, unless your experience indicates that the tank mixture will not result in turf injury.
- To avoid turf injury, use only on turfgrass that is reasonably free of stress from diseases, insects, excess heat or cold, drought or excess rainfall/irrigation, shaded areas, low soil pH, nematodes, improper mowing or improper applications of fertilizer and pesticides. Injury can occur if this product is applied under any of these or other stress conditions. Under any of these stress conditions, any turf damage caused by the use of this product is beyond the control of PBI/Gordon Corporation and all risk is assumed by the buyer and/or user.
- **NOTE:** Certain spray tank additives (adjuvants, wetting agents, surfactants), liquid fertilizers, and tank mixtures containing emulsifiable concentrates may reduce the selectivity on the turfgrass. If **any** discoloration is objectionable or any level of phytotoxicity would be unacceptable, then surfactants and other adjuvant(s) combined with EH-1405 Herbicide should not be used.
- **Not for sale or use in the States of California or New York** unless accompanied by supplemental labeling.
- Do not use this product on or near desirable plants, including within the drip line of the roots of desirable trees and shrubs, since injury may result.
- 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 (non-cropland 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.
- Aerial application is prohibited.

WEED RESISTANCE MANAGEMENT
For resistance management, this product contains Group 4 and Group 14 herbicides. Any weed population may contain or develop plants naturally resistant to this product and other Group 4 or Group 14 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same area. Appropriate resistance management strategies should be followed.

To delay herbicide resistance take one or more of the following steps:
- Rotate the use of this product or other Group 4 or Group 14 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use, and that considers mechanical control methods, cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive varieties) and other management practices.
- Scout area prior to application to identify the weed species present and their growth stage to determine if the intended application will be effective.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide resistance-management and/or integrated weed-management recommendations for specific types of turf and weed biotypes.
- For further information or to report suspected resistance, call 877-800-5556.

SPRAY PREPARATION AND TANK MIXTURES:
In certain applications, liquid fertilizer may replace part of the water as a diluent.

Water as diluent:
Add one-half the required amount of water to the spray tank, then add EH-1405 Broadleaf Herbicide slowly with agitation, and complete filling the tank with water. Mix thoroughly and continue agitation while spraying. When this product is left standing for extended periods of time, re-agitate to assure uniformity of the spray mixture. 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.

Liquid fertilizers as diluents:
ALWAYS PREMIX EH-1405 Broadleaf Herbicide WITH WATER BEFORE ADDING TO FLUID FERTILIZERS. For liquid nitrogen solutions such as U.A.N. or urea solutions. use a premix of 1 part of this product with 4 parts of water or use a premix with a 1:4 ratio of product to water. For other fluid fertilizers such as suspensions, use a premix of 1 part of this product with 50 to 60 parts of water.

Use suitable sources and rates of fertilizer based upon local recommendations. Refer to the mixing directions on the labels of the liquid fertilizers. Always perform a jar test for compatibility before large scale mixing.

The jar test can be conducted by mixing all components in a small container in proportionate quantities. If the mixture separates after standing and can be mixed readily by shaking, then the mixture can be used and applied with spray equipment providing continuous agitation. If large flakes, sludge, gels or other precipitates form, or if a separate oily layer or oil globules appear, then the herbicide and the liquid fertilizer should not be prepared as a tank mixture.

Adjuvants and spray additives:
Adjuvants (such as surfactants, spreaders, spreader-stickers, spray thickeners, foaming agents, activators, detergents, and drift reducing agents) combined with this product can damage the leaf tissue of turfgrass. If any discoloration or cosmetic effects are objectionable or would be unacceptable, then adjuvant(s) combined with EH-1405 Broadleaf Herbicide would not be recommended.

GROUND EQUIPMENT:
Spray distribution: The accuracy and uniformity of the herbicide distribution is the sole responsibility of the applicator. Power sprayers fitted with a boom or spray wand/gun may be used for broadcast applications and spot treatments. Boom sprayers equipped with appropriate flat fan nozzles, tips, and screens are suitable for broadcast applications. For best spray distribution and coverage, select a spray volume and delivery system that will ensure accurate and uniform coverage.

Spray volumes of 20 to 220 gallons per acre with spray pressures adjusted to between 20 to 40 psi. Use higher spray volumes for dense weed populations (up to 220 gallons per acre or 5 gallons per 1,000 square feet).

- Calibration and proper application are essential when using this product.
- Over-application or rates above those specified on this label can cause turf injury.
- Hand-held technique: 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 motion results in uneven coverage.

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.

This product may cause injury to susceptible/non-target 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). Do not apply when conditions are conducive to spray drift from the use site to untreated areas.

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.

WHERE TO USE:
This product provides selective broadleaf control in cool-season and warm-season turfgrass in four (4) 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, areas adjacent to athletic fields and paved areas.

- **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

Turfgrass tolerance:
- The turfgrass tolerance to this product may vary and temporary turfgrass discoloration may occur on bahiagrass, buffalograss, and bermudagrass. Adverse environmental conditions may reduce the selectivity on the turfgrass. Do not apply this product to stressed turf.
- Certain spray tank additives (adjuvants, wetting agents, surfactants), liquid fertilizers, and tank mixtures containing emulsifiable concentrates may reduce the selectivity on the turfgrass.

Spray Drift
Ground Boom Applications
- User must only apply with the release height recommended by the manufacturer, but no more than 4 feet above the ground or crop canopy.
- Select nozzle and pressure that deliver a medium or coarser droplet size (ASABE* S572).
- Applicators may spray only when wind speed is between 3 and 10 mph at the application site.
- Do not apply during temperature inversions.

Spray Drift Advisories
THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT. BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL CONDITIONS.

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.

Importance of Droplet Size
An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Select coarse to very coarse droplet size when sulfentrazone is used as a preemergent/preplant application.

Select medium to very coarse droplet size when sulfentrazone is used postemergence with a contact burndown herbicide.

*ASABE – American Society for Agricultural and Biological Engineers.

Controlling Droplet Size - Ground Boom

Volume: Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed, consider using a nozzle with a higher flow rate.

Pressure: Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.

Spray Nozzle: Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

Boom Height - Ground Boom
For ground equipment, the boom should remain level with the crop and have minimal bounce.

Shielded Sprayers: Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

Temperature and Humidity: When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

Temperature Inversions: Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

Wind
Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS. Applicators need to be familiar with local wind patterns and terrain that could affect spray drift. 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.

Handheld Technology Applications: Take precautions to minimize spray drift

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.

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

Spray Volume
Ground applicators must use a minimum finished spray volume of 10 gallons per acre. When sulfentrazone is tank mixed with a contact burndown herbicide, ground applicators must use a minimum spray volume of 15 gallons per acre.

APPLICATION SCHEDULES:
Apply this product to broadleaf weeds that are young and actively growing for the best results. 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. Fall applications provide improved control for emerged winter annuals and perennials such as henbit, chickweed, clover and ground ivy.

Sequential broadcast applications or follow-up applications as spot treatments 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, or any time broadleaf weeds are actively growing.

Extremes in environmental conditions e.g. temperature and moisture, soil conditions, and cultural practices may affect the activity of this product. 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 this product.

For newly seeded areas:
Delay application of this product to grass seedlings until after the second mowing.

For newly sodded, sprigged, or plugged areas:
The application of this product to newly sodded, sprigged, or plugged grasses should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations.

HOW MUCH TO USE:

USE RATES AND SPRAY VOLUMES:
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 hardened off or more mature.

TABLE 1. USE RATES FOR SOD FARMS, ORNAMENTAL LAWNS AND TURFGRASS.		
	Rate	Spray Volume
Cool-season Turf		
Kentucky bluegrass, annual bluegrass, annual ryegrass perennial ryegrass, tall fescue, red or fine leaf fescues, creeping bentgrass and colonial bentgrass (excluding golf greens and tees).	1.7 to 2.1 Pints/Acre (0.62 to 0.75 fl.oz./1,000 sq.ft.)	20 to 220 Gallons/Acre (0.5 to 5.0 Gallons/1,000 sq.ft.)
Warm-season Turf		
Hybrid bermudagrass, common bermudagrass, zoysiagrass, bahiagrass and buffalograss	1.3 to 1.7 Pints/Acre (0.5 to 0.62 fl.oz./1,000 sq.ft.)	20 to 220 Gallons/Acre (0.5 to 5.0 Gallons/1,000 sq.ft.)
Do not apply this product to warm-season turfgrass during spring green-up or in the fall during the transition period between active growth and dormancy. **Dormant turf:** This product may be applied to fully dormant bermudagrass, fully dormant zoysiagrass, and fully dormant bahiagrass.		

SPOT TREATMENT:
WITH HAND OPERATED SPRAYERS (INCLUDING BACKPACK SPRAYERS, OMPRESSION SPRAYERS, AND KNAPSACK SPRAYERS):

- Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre.
- Apply any time the emerged broadleaf weeds are actively growing.
- Calibration and proper application are essential when using this product.
- Uniform applications are essential when using this product. Over application or rates above those specified on this label including excessive overlaps of this product can cause turf injury.
- 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.
- **For cool-season turfgrass**, Mix 0.62 to 0.75 fl.oz. of this product 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.
- **For warm-season turfgrass**, Mix 0.50 to 0.62 fl.oz. of this product per one (1.0) gallon of water for treatment of approximately 1,000 sq.ft of turfgrass.

The maximum application rate is 0.75 fl.oz. of product per 1,000 sq.ft. per application [0.32 lb MCPP-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. Do not apply more than 2 applications per year, this includes spot treatments in combination with broadcast applications.

Do not use tank mixture combinations, unless your experience indicates that the tank mixture is effective and will not result in turf injury. 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:

Irrigation:

- Do not apply this product through any type of irrigation system.
- Rainfast in 6 hours. Do not apply this product immediately before rainfall or irrigation.
- If possible, do not irrigate or water the turfgrass within 6 to 24 hours after application.
- If dry conditions exist, a scheduled irrigation or watering 24 hours before and 24 hours after application is recommended.

Mowing:

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

Reseeding interval:

- Treated areas may be reseeded 3 weeks after application.

BROADLEAF WEEDS CONTROLLED:

EH-1405 Herbicide will control the following broadleaf weeds:

BROADLEAF WEEDS			
Aster, white heath & white prairie	Dollarweed (*pennywort)	Lawn burweed	Ragweed
Bedstraw	False dandelion (*spotted catsear & common catsear)	Lespedeza, common	Redweed
Beggarweed, creeping		Mallow, common	Red sorrel (*sheep sorrel)
Bindweed		Matchweed	Shepherdspurse
Black medic	Field bindweed (*morningglory & creeping jenny)	Mouseear chickweed	Spurge
Broadleaf plantain		Nutsedge** (yellow)	Thistle
Buckhorn plantain	Field oxeye-daisy (*creeping oxeye)	Old world diamond flower	Virginia buttonweed
Bull thistle		Oxalis (*yellow woodsorrel & creeping woodsorrel)	White clover (*Dutch clover, honeysuckle clover, white trefoil, & purplewort)
Burdock, common	Filaree, whitestem & redstem	Parsley-piert	
Buttercup, creeping		Pennsylvania smartweed	Wild carrot
Carpetweed	Florida betony	Pepperweed	Wild garlic
Chickweed, common	Florida pusley	Pigweed	Wild geranium
Chicory	Ground ivy	Pineappleweed	Wild lettuce
Cinquefoil	Groundsel	Plantain	Wild mustard
Clover	Hawkweed	Poison ivy	Wild onion
Curly dock	Healall	Poison oak	Wild strawberry
Dandelion	Henbit	Prickly lettuce (*compass plant)	Yarrow
Dayflower	Innocence (Blue-eyed Mary)		Yellow rocket
Deadnettle		Puncturevine	and many more broadleaf weeds
Dock	Knotweed	Purple cudweed	
Dogfennel	Lambsquarters	Purslane	
*Synonyms **Suppression only when nutsedge is young and actively growing.			

Tough weed control in industrial or low maintenance areas:

This product may be used as a component in a noxious weed control program. EH-1405 Herbicide may be broadcast applied with ground equipment to control annual, biennial, and perennial broadleaf weeds.

Mixtures of cool-season species established for these and other low maintenance areas can be treated. Mixed stands of Kentucky bluegrass, tall fescue, smooth bromegrass, orchardgrass and reed canarygrass may be treated.

Treatments of EH-1405 Herbicide may injure or kill legumes including clovers (sweet, yellow, red, crimson, alsike, hop, white), lespedezas, trefoils and vetches.

Table 2. Rates of product per acre for specific hard-to-control weeds with ground equipment.

Weed Types	Troublesome weeds such as:	Amount of product, pints/acre[1]	When to Apply
Annual Broadleaf	ivyleaf morningglory, redroot pigweed, cocklebur, sunflower, velvetleaf (butterprint)	1.3 to 2.1 pints/acre	Spring or fall during active growth.
Biennial	Bull thistle, musk thistle, common burdock	2.0 to 2.5 pints / acre	Spring or fall during seedling to rosette stage.
Perennial	Burclover, Canada thistle, English daisy, field bindweeds, hoary cress (whitetop), Veronica (corn speedwell), wild violet.	2.1 to 2.5 pints / acre	Spring or fall during bud to bloom stage.

Footnote 1: Use the lower rate within the range specified for highly favorable plant growing conditions and when broadleaf weeds are less than 6 inches in height.
Use the higher rate within the range specified for tall vegetation, dense canopies, weeds beyond the suggested growth stage, or during adverse conditions.

Biennial and perennial weeds may require follow-up or sequential treatments.

Spray volumes with ground equipment:

- For tank mixtures of EH-1405 Herbicide, use spray volume greater than 20.0 gallons per acre or use the specified spray volume of the companion product(s).

ADJUVANTS:
The addition of adjuvants (surfactants, spreaders, spreader-stickers, spray thickeners, foaming agents activators, detergents, and drift reducing agents,) is not necessary when using this product. Under extreme environmental conditions such as drought, the addition of a surfactant may improve efficacy. However, if the foliar phytotoxicity (leaf burn and necrosis) occurs too quickly, then the translocation of EH-1405 Herbicide will not occur and the level of performance (control) may be reduced in perennial broadleaf weeds.

STORAGE AND DISPOSAL

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

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]
CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning If burned, stay out of smoke.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

[OR

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

[For Refillable Containers:]

CONTAINER HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Container cleaning: Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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*, CO1-0132C,(W.D. WA). For further information, please refer to http://www.epa.gov/espp.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

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 EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or
consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the 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 6 hours
- Rainfast [Rainproof] in 6 hours
- Spurge control in as little as one week
- Proven performance
- Consistently fast control on tough weeds like dandelion, spurge, clover, plantain, ground ivy and [various other listed weeds].
- From the makers of Trimec® herbicides.
- For information call XXX-XXX-XXXX [contact www.xxx-xxxx.com]
- ProForm(TM) logo presented on the containers

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00866.20210108.amend-proposed-clean

2. Reason for Issue: MCPP-p Reg Review + EPA Comments #2, Registration Review - Sulfentrazone