

2217-867

5-7-2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

7 MAY 2008

James L. Kunstman
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 14090
Kansas City, MO 64101

Dear Dr. Kunstman:

Subject: RED Label Amendment Dicamba, MCPP-p and 2,4-D
EH-1406 Herbicide
EPA Registration Number 2217-867

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

1. Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised as follows:

Delete the statement "Avoid contact with eyes, skin or clothing."

Revise the statement "Do not get in eyes or on clothing" to read "Do not get in eyes, on skin or on clothing."
2. The PPE section must be revised as follows:

Delete the statement "when applying with any handheld nozzle or equipment, mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate."

Please note that in addition to the PPE specified in the 2,4-D and dicamba REDs, the acute toxicity review also requires that all handlers wear chemical-resistant gloves.
3. The mechanical transfer engineering control text is no longer required per the 2,4-D RED and may be deleted from the label.

- 4. The text “except as noted on appropriate labels” must be deleted from the current environmental hazards statement. In addition, revise the first sentence of the environmental hazards statement to read as follows:

“This pesticide may be toxic to fish and aquatic invertebrates and may adversely affect non-target plants.”

- 5. The early entry PPE must be revised to read:

“Coveralls worn over short-sleeve shirt and short pants,
Chemical-resistant footwear plus socks,
Chemical-resistant gloves made of any waterproof material,
Chemical-resistant headgear for overhead exposure, and
Protective eyewear.”

- 6. With the exception of drift-related text appearing in the Environmental Hazards “Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas” and General Precautions and Restrictions “Do not apply this product in a way that will contact workers or other persons, either directly or through drift”, all other spray drift text must be replaced with the following: “Spray Drift Management A variety of factors including weather conditions (e.g., wind directions, wind speed, temperature, relative humidity) and method of application (e.g., ground aerial, airblast, chemigation) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

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

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

Wind Speed

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

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Temperature Inversions

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 aerial and 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.”

- 7. Add the following application restriction statements:
“Aerial application is prohibited.”
“Do not use this product on or near desirable plants, including within the dripline of the roots of desirable trees and shrubs, since injury may result.”
- 8. The MCPP-p RED requires a minimum retreatment interval of 30 days for all application types and use sites. Therefore, references to 2-6 weeks and 21 days retreatment intervals (pages 7-10) must be revised to indicate a minimum retreatment interval of 30 days.

On page 8, delete the statement “excluding spot treatments” under the non-cropland section of the table entitled “Limitations on 2,4-D applications to ornamental turfgrass and sod farms” or indicate that “excluding spot treatments” applies only to ornamental turfgrass applications.

On page 10 of the label, delete the statement “excluding spot treatments” under the non-cropland section of the table entitled “Limitations on 2,4-D applications to...”

On pages 8 and 10 of the label, delete the statement “The maximum seasonal rate of sulfentrazone...” through “...stages of the target weeds.”

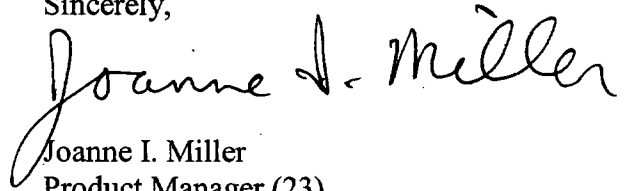
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9. To the Warranty section add "To the extent consistent with applicable law" in front of "the company makes no other" and "the exclusive remedy".
10. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

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

Sincerely,



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

Enclosure

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ACCEPTED *ST/4*
with COMMENTS
In EPA Letter Dated:
7 MAY 2008

EH-1406 HERBICIDE

EPA Reg. No. 2217-867

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

2217-867

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. Not for sale, distribution or use in Nassau or Suffolk Counties in New York State.

CONSULT THE PEST REGULATORY AGENCY OF YOUR STATE PRIOR TO USE OF THIS PRODUCT.

ACTIVE INGREDIENT:

2,4-D, dimethylamine salt	18.79%
Mecoprop-p, dimethylamine salt	6.80%
Dicamba, dimethylamine salt.....	3.02%
Sulfentrazone.....	0.67%
INERT INGREDIENTS:	<u>70.72%</u>
TOTAL	100.0%

THIS PRODUCT CONTAINS:

- 1.40 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 15.66 %
 - 0.50 lbs. (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 5.62%
 - 0.22 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 2.52%
 - 0.06 lbs. 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 0.67%
- Isomer Specific By AOAC Methods.

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.

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, eyes or clothing.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are natural rubber, natural rubber blends and laminates. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.



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

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

See engineering controls for additional requirements.

User Safety Requirements

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statements

Containers over 1 gallon and less than 5 gallons: Mixers and loaders who do not use a mechanical system (probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

Containers of 5 or more gallons: Do not open-pour product from this container. A mechanical system (such as a probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d) (4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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.

First Aid

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

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Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5566 for emergency medical treatment information.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards

This pesticide may be toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

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,
- chemical-resistant gloves made of any water-proof material,
- shoes plus socks 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:

EH-1406 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.

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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-1406 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 provide 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—14 days.
- This product is generally rainfast in as little as 6 hours.

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-1406 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-1406 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-1406 Broadleaf Herbicide would not be recommended. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

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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). Applications are recommended only when there is no potential hazard from spray drift during dormant and active growth periods.

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 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, 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
- **Non-cropland Sites:** Highway rights-of-way (principal, interstate, county, private, and unpaved roads). Roadsides, roadside ditches, road shoulders, road embankments, dividers, medians, parking areas, and paved areas. Municipal, state, and federal lands. Airports, airfields and military installations. Fuel storage areas. Fencerows. Industrial sites (including but not limited to lumber yards, tank farms, storage areas, vacant lots and production facilities). Utility and pipeline rights-of-way.

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 (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).

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- 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.

Turfgrass tolerance:

- The turfgrass tolerance to this product may vary and temporary turfgrass yellowing may occur on certain varieties of hybrid 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. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

Prohibitions:

- 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.
- 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.
- Do not apply product to bare ground.
- New York: Only one application per year of this product is allowed. This product is not allowed to be sold, distributed or used in Nassau or Suffolk Counties.
- California: Make broadcast applications only between March 1 and September 1. If troublesome weeds appear during other times of the year, a spot application can be made. While irrigation is necessary and important for plant growth, apply irrigation water efficiently so that no more than 125% of the net irrigation requirement is applied for any irrigation event. Apply efficient irrigations for six months following application of sulfentrazone containing products.

Spray Drift Management

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

Droplet Size

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

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

Wind Speed

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

Temperature Inversions

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

Susceptible Plants

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

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.

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

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 at a 2 - 6 week interval 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.

Reseeding interval:

Treated areas may be reseeded 3 weeks after application.

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

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infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds hardened off or more mature.

The maximum seasonal rate of sulfentrazone contained in this product with two (2) broadcast applications to turfgrass is 0.074 pounds of sulfentrazone per acre per season. The retreatment interval for sequential broadcast applications of this product on ornamental turfgrass is two (2) to six (6) weeks depending upon the growth stages of the target weeds.

TABLE 1. USE RATES FOR SOD FARMS, ORNAMENTAL LAWNS AND TURFGRASS.		
Species	Rate	Recommended 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).	3.25 to 4 Pints/Acre (1.2 to 1.5 fl. oz./1,000 sq. ft.)	20 to 220 Gallons/Acre (0.5 to 5.0 Gallons/1,000 sq. ft.)
Mixtures of cool-season species in non-cropland areas established for roadside vegetation management or for low maintenance. (Kentucky bluegrass, tall fescue, smooth brome grass & orchardgrass)		
Warm-season Turf		
Hybrid Bermudagrass, common Bermudagrass, zoysiagrass, bahiagrass and buffalograss	2.75 to 3.25 Pints/Acre (1.0 to 1.2 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.		
New York: Only one application per year of this product is allowed. This product is not allowed to be sold, distributed or used in Nassau or Suffolk Counties.		

Limitations on 2,4-D applications to ornamental turfgrass and sod farms					
Use Site	Maximum Rate per Application	Maximum Number of Applications per Year	Minimum Interval Between Applications	Minimum Spray Volume	Maximum seasonal rate
Ornamental turfgrass	4.0 pints/A (0.7 lb 2,4-D ae/A)	2	NA	2 gal/A	8.0 pints/A (1.4 lb 2,4-D ae/A)
Sod farms	4.0 pints/A (0.7 lb 2,4-D ae/A)	2	21 Days	2 gal/A	8.0 pints/A (1.4 lb 2,4-D ae/A)
ae = Acid Equivalent. Do not exceed the maximum seasonal rate of 8.0 pints (1.4 lb 2,4-D ae) per acre per season, excluding spot treatments.					

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

- 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.

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- Follow-up applications as spot treatments at a 2—6 week interval are recommended for more mature weeds, for dense infestations, and for adverse environmental conditions.
- **For cool-season turfgrass:** Mix 1.2 – 1.5 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 1.0 - 1.2 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.

CULTURAL TIPS:

Irrigation:

- Do not apply this product through any type of irrigation system.
- Rainfast in as little as 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.

BROADLEAF WEEDS CONTROLLED:

EH-1406 Herbicide will control or suppress the following broadleaf weeds and will control or suppress broadleaf weeds that are susceptible to 2,4-D. Apply any time the emerged broadleaf weeds are susceptible.

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

Tough weed control in industrial or low maintenance areas:

Mixed stands of Kentucky bluegrass, tall fescue, smooth brome grass, orchardgrass and reed canarygrass may be treated. [Applications to non-cropland areas (roadsides and rights-of-way) are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.]

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Treatments of EH-1406 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	Recommended Spray Volume	When to Apply
Annual Broadleaf	ivyleaf morningglory, redroot pigweed, cocklebur, sunflower, velvetleaf (butterprint)	2.5-4.0 pints/acre	20 to 220 gal/Acre (0.5 to 5.0 gal per 1,000 sq. ft.)	Spring or fall during active growth.
Biennial	Bull thistle, musk thistle, common burdock	4.0-5.0 pints/acre	20 to 220 gal/Acre (0.5 to 5.0 gal per 1,000 sq. ft.)	Spring or fall during seedling to rosette stage.
Perennial	Burclover, Canada thistle, field bindweeds, English daisy, hoary cress (whitetop), Veronica (corn speedwell), wild violet.	4.0-5.0 pints/acre	20 to 220 gal/Acre (0.5 to 5.0 gal per 1,000 sq. ft.)	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.
 New York: Only one application per year of this product is allowed. This product is not allowed to be sold, distributed or used in Nassau or Suffolk Counties.

Limitations on 2,4-D applications to ornamental turfgrass, roadsides and rights-of-way (noncropland)

Use Site	Maximum Rate per Application	Maximum Number of Applications per Year	Minimum Interval Between Applications	Minimum Spray Volume	Maximum seasonal rate
Ornamental turfgrass	4.0 pints/A (0.7 lb 2,4-D ae/A)	2	NA	2 gal/A	8.0 pints/A (1.4 lb 2,4-D ae/A)
Non-Cropland: roadsides and rights-of-way	5.0 pints/A (0.88 lb 2,4-D ae/A)	2	21 Days	2 gal/A	10 pints/A (1.6 lb 2,4-D ae/A)

ae = Acid Equivalent. Ornamental turfgrass: Do not exceed the maximum seasonal rate of 8.0 pints (1.4 lb 2,4-D ae) per acre per season, excluding spot treatments. Non-Cropland: Do not exceed the maximum seasonal rate of 10 pints (1.6 lb 2,4-D ae) per acre per season, excluding spot treatments.

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

The maximum seasonal rate of sulfentrazone contained in this product with two (2) broadcast applications to turfgrass is 0.074 pounds of sulfentrazone per acre per season. The retreatment interval for sequential broadcast applications of this product on ornamental turfgrass is two (2) to six (6) weeks depending upon the growth stages of the target weeds.

Spray volumes with ground equipment:

- For EH-1406 Herbicide alone, a spray volume of 10.0 gallons per acre (gpa) is recommended.
- For tank mixtures of EH-1406 Herbicide, spray volume of 20.0 gallons per acre is recommended 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

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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-1406 Herbicide will not occur and the level of performance (control) may be reduced in perennial broadleaf weeds. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

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.

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.

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:

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- Water-based formula
- Water-based formulation
- 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.
- Trimec® is a registered trademark of PBI/Gordon Corporation.
- For information call XXX-XXX-XXXX [contact www.xxx-xxxx.com]
- ProForm(TM) logo presented on the containers



- Water based
- Warm weather weed control—FAST!
- For use on: Bluegrass, Fescues, Perennial Ryegrass, Bentgrass, Bermudagrass, Zoyziagrass, Bahiagrass and Buffalograss
- Fast visual response
- Economical—lower cost water-based formulation
- Easy cleanup
- Warm-weather weed control option
- Suitable for applications up to 90°F
- Foliar absorption
- Reduces call backs
- Low odor
- Designed for residential and commercial turf applications and many other sites.

3. Alternate Brand Name

- Surge Broadleaf Herbicide for Turf

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00867.20071105
2. **Previous Version:** AP011807
3. **Reason for Issue:** Various changes pertaining to re-registration. Re-format label.