

2217-882

12-15-2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 15 2009

Mr. James L. Kunstman, Ph.D
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, Missouri 64101

Subject: Label Notification(s) for Pesticide Registration Notices 2007-4 and 98-10
Storage & disposal and other changes
Request Primary Brand Name Change: **EH-1415 ORP**

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 and 98-10 dated October 5, 2009 for:

EPA Registration 2217-882 EH-1415 ORP

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and 98-10, and finds that the label change(s) requested falls within the scope of PRN-2007-4 and 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Banza Djapao of my staff at 703-305-7269.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 2217-882	2. EPA Product Manager Joanne I. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) EH-1415 Professional EH-1415 ORP	PM# Product Manager—Team 23	
5. Name and Address of Applicant (Include ZIP Code) PBI/Gordon Corporation Post Office Box 014090 Kansas City, Missouri 64101 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>August 25, 2009</u>	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

NOTIFICATION

DEC 15 2009

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Labeling notifications according to Pesticide Registration Notice (PRN) 98-10 and PRN 2007-4, Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal: Standards for Pesticide Containers and Containment.

Please refer to cover letter for details and certification statement.

e-mail to jkunstman@pbigordon.com FAX: 816-421-2731

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per Container	<input type="checkbox"/> Glass	<input checked="" type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 15-50 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name James L. Kunstman, Ph.D.	Title Director of Regulatory Services	Telephone No. (Include Area Code) 816-460-6292
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Director of Regulatory Services	
4. Typed Name James L. Kunstman, Ph.D.	5. Date October 5, 2009	

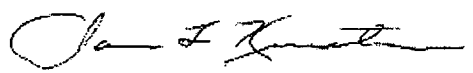
Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
2217-882	10/5/2009	002217.00882.20091005. notif-proposed-highlighted 002217-00882.20091005. notif-proposed-clean

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

10/05/2009

Date

James L. Kunstman, Ph.D.
Name (typed)

Director, Regulatory Services
Title

III. Labeling notification per Pesticide Registration Notice (PRN) 2007-4:

1. We ask to revise the disposal instructions and to adopt the exact language of Pesticide Registration Notice (PRN 2007-4), Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal: Standards for Pesticide Containers and Containment." Please refer to page 10 of the draft labeling.
2. **Certification:** This notification is consistent with the guidance PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this amended labeling is not consistent with the terms of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Section 12 and 14 of FIFRA.

IV. Enclosures:

1. Application for Pesticide Amendment (EPA Form 8570-1)
2. One (1) annotated version of the draft labeling and
3. One (1) version of the draft labeling without notations

If you have any questions, please call me at 816-460-6292 or contact me at jkunstman@pbigordon.com.

Sincerely,



James L. Kunstman, Ph.D.
Director of Regulatory Services

EH-1415 **PROFESSIONAL** ORP

NOTIFICATION

EPA Reg. No. 2217-882

DEC 15 2009

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

ACTIVE INGREDIENT:

2,4-D, 2-ethylhexyl ester	1.153%
Mecoprop-p acid	0.174%
Dicamba acid	0.073%
Sulfentrazone	0.034%
OTHER INGREDIENTS:	98.566%
TOTAL	100.000%

THIS PRODUCT CONTAINS:

- 15.30 lb 2,4-dichlorophenoxyacetic acid equivalent per ton or 0.765% (cas 1928-43-4)
- 3.48 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy)propionic acid equivalent per ton or 0.174% (CAS 16484-77-8)
- 1.46 lb 3,6-dichloro-o-anisic acid equivalent per ton or 0.073% (CAS 1918-00-9)
- 0.68 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 ton or 0.034% (CAS 122836-35-5)

Isomer Specific by AOAC Methods

TRIMEC® and Surge® are registered trademarks of PBI/Gordon Corporation.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

Personal Protective Equipment (PPE)

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

All loaders, applicators, and other handlers must wear:

- long-sleeved shirt and long pants,
- shoes plus socks.
- chemical-resistant gloves

~~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.

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 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 the 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 1-877-800-5556 for emergency medical treatment information.

Environmental Hazards

This pesticide **may be** toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

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

DIRECTIONS FOR USE

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

GENERAL PRECAUTIONS AND RESTRICTIONS:

- Do not enter or allow people (or pets) to enter the treated area until dusts have settled. 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.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

WHERE TO USE:

EH-1415 HERBICIDE ORP is a [Trimec® or Surge® broadleaf herbicide] herbicide containing fertilizer, 2,4-D, mecoprop-p, dicamba and sulfentrazone. This granular weed and feed provides plant nutrients

and controls a broad spectrum of broadleaf weeds in turfgrass. Supplemental nitrogen, phosphorus, and potash should be applied according to soil tests or State Extension Service recommendations.

EH-1415 ORP is intended to be applied by noncommercial users, lawn care operators, and landscape personnel. Cool season and warm season grasses established in institutional, ornamental, and residential sites may be treated.

Institutional sites are defined as turf areas around properties or facilities providing a service to public or private organizations; for example: hospitals, nursing homes, schools, museums, libraries, sport facilities (including golf courses), and office buildings may be treated. Ornamental sites include turfgrass established around residences, parks, streets, retail outlets, cemeteries, and institutional buildings. Finally, residential 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.

EH-1415 ORP may be applied to newly seeded cool season turfgrass. Applications are recommended only after the third mowing or after the grass seedlings have tillered and have developed an adequate secondary root system.

EH-1415 ORP may be applied to newly established warm season turfgrass. Treatments should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations, and low application rates (1/2 of the recommendation for established turfgrass) are suggested.

A uniform broadcast distribution of product on the treated area is essential. Do not exceed the specified application rate for any area. Do not apply product to bare ground. Do not use this product on dichondra, carpetgrass, creeping bentgrass, or turf containing desirable clovers.

California: Make broadcast applications only between March 1 and September 1. 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.

New York: Only one application per year of this product is allowed. This product is not allowed to be sold or used in Nassau or Suffolk Counties.

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, and zoysiagrass:

Apply 130 to 174 pounds of EH-1415 ORP per acre of established turfgrass. Or, the equivalent application rates are 3.0 to 4.0 pounds of product per 1,000 square feet of turfgrass.

For New York State only:

Apply 130 to 166 pounds of EH-1415 ORP per acre of established turfgrass. Or, the equivalent application rates are 3.0 to 3.8 pounds of product per 1,000 square feet of turfgrass.

For St. Augustinegrass, centipedegrass, hybrid bermudagrass, bentgrass, and colonial bentgrass:

Apply 87 to 109 pounds of EH-1415 ORP per acre of established turfgrass. Or, the equivalent application rates are 2.0 to 2.5 pounds of product per 1,000 square feet of turfgrass.

Limitations on broadcast applications to ornamental turfgrass.				
Use Site	Maximum Rate per Application	Maximum Number of Applications per Year	Minimum Interval Between Applications	Maximum seasonal rate
Ornamental turfgrass	174 pounds/A (1.33 lb 2,4-D ae/A) (0.30 lb MCP-P ae/A) (0.13 lb dicamba ae/A)	2	30 Days	348 pounds/A (2.66 lb 2,4-D ae/A) (0.60 lb MCP-P ae/A) (0.25 lb dicamba ae/A)

ae = Acid Equivalent. Do not exceed the maximum seasonal rate of 348 pounds (2.66 lb 2,4-D ae), 0.60 lb MCP-P ae and 0.25 lb dicamba ae) per acre per season, excluding spot treatments.

Sequential or follow-up applications may be required for dense infestations of perennial and biennial weeds. Also, adverse environmental conditions prior or after application may reduce the effectiveness. If required, the treatment interval between the first and second applications should be approximately 30 days.

Drop spreaders, rotary spreaders, and other granular equipment should be calibrated for accurate and uniform applications of this product. Calibrate the equipment by applying the product over a measured or known area and adjust the equipment according to the recommendations of the equipment manufacturer. Refer to the rate table for the appropriate bag sizes and the area to be treated.

[Example:]

Bag Size, Lb	Application Rate, Lb/1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
40	2.0	20,000
	2.5	16,000
	3.0	13,300
	3.2	12,500
	3.4	11,800
	3.6	11,100
	4.0	10,000

APPLICATION SUGGESTIONS DIRECTIONS:

1. Spring and fall applications are recommended for the best control. However, EH-1415 ORP can be applied any time broadleaf weeds are present and actively growing.
2. Mow the turfgrass 1 to 2 days before application.
3. Water the turfgrass thoroughly (>1/2 inch) at least 1 to 2 days before application.
4. Schedule applications in the morning when dew is present. Or, sprinkle or irrigate lightly (<1/4 inch) before application to provide maximum control.
5. Rainfall or irrigation within 24 hours after application may reduce the effectiveness. Do not irrigate or water the turfgrass within 24 hours after application.

CALIBRATION INSTRUCTIONS:

To provide proper distribution, calibrate spreader before application. [Refer to table for appropriate bag sizes.]

- For 2.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 500 square feet and adjust to apply at the rate of 1 pound of product per 500 square feet.
- For 2.5 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 400 square feet and adjust to apply at the rate of 1 pound of product per 400 square feet.
- For 3.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 333 square feet and adjust to apply at the rate of 1 pound of product per 333 square feet.
- For 3.2 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- For 3.4 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 300 square feet and adjust to apply at the rate of 1 pound of product per 300 square feet.

- For 3.6 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.
- For 3.8 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 260 square feet and adjust to apply at the rate of 1 pound of product per 260 square feet.
- For 4.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet.

Spreader settings for 1.0 pound of product per 310 square feet	
Scotts EasyGreen® Rotary.....	26
Scotts Drop.....	5
Scotts SpeedyGreen® Rotary.....	3.5
GreenView Drop (Spred II).....	4
Central Drop (#205).....	5.5
Sears Drop (#19810).....	4
Ortho Drop (#5000).....	5
Precision Drop (Red Devil).....	4

Spreader	Delivers lb /1,000 sq.ft.							
	2.0 lb	2.5 lb	3.0 lb	3.2 lb	3.4 lb	3.6 lb	3.8 lb	4.0 lb
LESCO® Rotary calibration gauge setting #	X		X		X	X		X
Ortho® Drop (5000)	X		X		X	X		X
Ortho® Rotary (6000)	X		X		X	X		X
Precision® Red Devil® Rotary	X		X		X	X		X
Quaker® Rotary	X		X		X	X		X
Republic® EZ Drop	X		X		X	X		X
Republic® EZ Grow	X		X		X	X		X
Republic® EZ Rotary	X		X		X	X		X
Scotts® Drop (PF3)	X		X		X	X		X
Scotts® Easy Green	X		X		X	X		X
Scotts® Speedy Green	X		X		X	X		X
True Temper Rotary	X		X		X	X		X

SPREADER SETTINGS					
These suggested spreader settings are not intended to replace calibration. Please calibrate your spreader before applying product.					
40 lbs. treats 16,000 sq.ft. at the 109 lbs./acre – LOW RATE (2.5 lbs./1,000 sq.ft.)					
40 lbs. treats 10,500 sq.ft. at the 166 lbs./acre – MEDIUM RATE (3.8 lbs./1,000 sq.ft.)					
40 lbs. treats 10,000 sq.ft. at the 174 lbs./acre – HIGH RATE (4.0 lbs./1,000 sq.ft.)					
SPREADER	GROUND SPEED	WIDTH OF COVERAGE	SPREADER SETTINGS		
			LOW RATE	MEDIUM RATE	HIGH RATE
Andersons AccuPro 1000	3 mph	8 feet	I ½	J ¾	K
Andersons AccuPro 2000, SR-2000 (cone 6)	3 mph	8 feet	I ½	J ¾	K
Scotts R-8A (cone 6)	3 mph	8 feet	I	J ¼	J ½
Lely Models WTR, WFR, HR, 1250 (PTO at 450 rpm)	4.5 mph	26 feet	3 ¼ II-C	4 ½ II-C	4 ¾ II-C
Vicon (03 series)	4.5 mph	30 feet	19	24	25

Note to Supplemental Registrants: Select the appropriate bag size and present only the information provided for that bag size on your product labeling. Also, equipment settings of drop spreaders, rotary spreaders, and other granular applicators may be presented on the container labels.

Bag Size, Lbs.	Application Rate, Lb/1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.	Bag Size, Lbs.	Application Rate, Lb/1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
15	2.0	7,500	28	2.0	14,000
	2.5	6,000		2.5	11,200
	3.0	5,000		3.0	9,300
	3.2	4,700		3.2	8,800
	3.4	4,400		3.4	8,200
	3.6	4,200		3.6	7,800
16	4.0	3,750	36	4.0	7,000
	2.0	8,000		2.0	18,000
	2.5	6,400		2.5	14,400
	3.0	5,300		3.0	12,000
	3.2	5,000		3.2	11,300
	3.4	4,700		3.4	10,500
17	3.6	4,400	37	3.6	10,000
	4.0	4,000		4.0	9,000
	2.0	8,500		2.0	18,500
	2.5	6,800		2.5	14,800
	3.0	5,700		3.0	12,300
	3.2	5,300		3.2	11,600
18	3.4	5,000	39	3.4	10,900
	3.6	4,700		3.6	10,300
	4.0	4,250		4.0	9,250
	2.0	9,000		2.0	19,500
	2.5	7,200		2.5	15,600
	3.0	6,000		3.0	13,000
20	3.2	5,600	40	3.2	12,200
	3.4	5,300		3.4	11,500
	3.6	5,000		3.6	10,800
	4.0	4,500		4.0	9,750
	2.0	10,000		2.0	20,000
	2.5	8,000		2.5	16,000
24	3.0	6,700	42	3.0	13,300
	3.2	6,400		3.2	12,500
	3.4	5,800		3.4	11,800
	3.6	5,700		3.6	11,100
	4.0	5,000		4.0	10,000
	2.0	12,000		2.0	21,000
25	2.5	9,600	45	2.5	16,800
	3.0	8,000		3.0	14,000
	3.2	7,500		3.2	13,100
	3.4	7,100		3.4	12,400
	3.6	6,700		3.6	11,700
	4.0	6,000		4.0	10,500
25	2.0	12,500	45	2.0	22,500
	2.5	10,000		2.5	18,000
	3.0	8,300		3.0	15,000
	3.2	7,800		3.2	14,100
	3.4	7,400		3.4	13,200
	3.6	6,900		3.6	12,500
4.0	6,250	4.0	11,300		

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Bag Size, Lbs.	Application Rate, Lb/1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.	Bag Size, Lbs.	Application Rate, Lb/1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
26	2.0	13,000	50	2.0	25,000
	2.5	8,000		2.5	20,000
	3.0	8,700		3.0	16,700
	3.2	8,100		3.2	15,600
	3.4	7,600		3.4	14,700
	3.6	7,200		3.6	13,900
	4.0	6,500		4.0	12,500

DISTRIBUTION AND SPREADER PATTERNS:

Always apply with a properly calibrated rotary or drop type fertilizer spreader to distribute the granules evenly. Never apply by hand.

Coverage - To determine how much you need to apply, multiply the length of your lawn by its width. This equals your total square footage. Deduct all non-lawn areas (house, gardens, etc.). One 50 pound bag covers up to 12,500 square feet.

SINGLE PASS DISTRIBUTION:

For best results, apply this product evenly and uniformly avoiding streaking, skips or overlaps.

1. For rotary spreaders, operate at intervals corresponding to the swath width. For drop spreaders, overlap the wheel tracks to ensure complete coverage.
2. First, spread the borders of the lawn. Then apply this product to the center with straight line passes
3. Walk at a steady pace to ensure even coverage. Close the spreader opening when turning to change directions or when stopping.

State mandated fertilizer labeling requirements:

Typically a lawn will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing ____ pounds of nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer program suitable to your geographical region.

Fertilizer information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metal.htm>

Advisory for Fertilizers Containing Iron:

Keep this product off sidewalks, patios, driveways, etc. This fertilizer may contain iron which will stain concrete and painted surfaces. If it comes in contact with concrete surfaces, sweep off immediately before flushing with water. If concrete is wet when contact occurs, staining may be impossible to prevent. Be careful when using rotary spreaders which scatter fertilizer beyond lawn edge and onto concrete.

Association of American Plant Food Control Officials (AAPFCO):

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metal.htm>.

OR

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.regulatory-info-xx.com>

Each registrant shall substitute a unique alphanumeric identifier for "xx". This statement may be used only if the licensee establishes and maintains the Internet site: there is a clearly visible, direct hyperlink to a government website; and the Internet site contains no advertising or company specific information

[For fertilizer grade 16-0-9

Typically a lawn will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing 0.64 pounds of nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer program suitable to your geographical region.]

USE PRECAUTIONS:

Do not use this product on dichondra, carpetgrass, creeping bentgrass, or turf containing desirable clovers.

Do not apply this product to newly seeded grasses until well-established or after the third mowing.

Do not use this product on flowers, vegetables, groundcovers, gardens or landscape plantings including shrubs and trees. Do not exceed specified dosage for any area.

Do not use this product on 'Floratum' St. Augustinegrass.

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.

WEEDS CONTROLLED:

Dandelion, chickweed, plantain, and clover are controlled effectively with EH-1415 ORP. A partial list of susceptible weeds is shown below.

BROADLEAF WEEDS			
Annual yellow sweetclover	Cinquefoil	Mexicanweed	Spanishneedles
Aster	Clover, crimson	Milk vetch	Speedwell
Austrian fieldcress	Clover, hop	Mouseear hawkweed	Spiny amaranth
Bedstraw	Clover, red	Mugwort	Spiny sowthistle
Beggarticks	Clover, strawberry	Narrowleaf plantain	Spotted catsear
Betony, Florida	Clover, sweet	Nettle	Spotted spurge
Bird vetch	Clover, white	Orange hawkweed	Spurweed
Bitter wintercress	Cockle	Oxalis	Strawberry, India mock
Bittercress, hairy	Creeping jenny	Parsley-piert	Tall nettle
Bitterweed	Cudweed	Parsnip	Tansy ragwort
Black-eyed Susan	Curly dock	Pearlwort	Tansy mustard
Black medic	Daisy, English	Pepperweed	Thistle
Blackseed plantain	Daisy fleabane	Pigweed	Trailing crownvetch
Blessed thistle	Daisy, oxeye	Pineywoods bedstraw	Tumble mustard
Bloodflower milkweed	Dandelion	Plains coreopsis	Tumble pigweed
Blue lettuce	Dichondra	Plantain	Venice mallow
Blue vervain	Dollarweed	Poison ivy	Virginia buttonweed
Bracted plantain	False dandelion	Poison oak	Virginia pepperweed
Bristly oxtongue	Falseflax	Poorjoe	Wavyleaf bullthistle
Broadleaf dock	False sunflower	Prairie sunflower	Western clematis
Broadleaf plantain	Florida pusley	Prostrate knotweed	Wild aster
Buckhorn plantain	Galinsoga	Prostrate pigweed	Wild carrot
Bulbous buttercup	Goldenrod	Prostrate spurge	Wild four-o'clock
Bull thistle	Ground ivy	Puncturevine	Wild garlic
Bullnettle	Gumweed	Purslane, common	Wild geranium
Burclover	Hairy fleabane	Ragweed	Wild lettuce
Burdock	Hawkweed	Red sorrel	Wild marigold
Burning nettle	Healall	Redroot pigweed	Wild onion
Burweed	Heartleaf drymary	Redstem filaree	Wild rape
Buttercup	Heath aster	Rough cinquefoil	Wild strawberry
Buttonweed	Henbit	Russian pigweed	Wild vetch
Canada thistle	Hoary cress	Scarlet pimpernel	Woodsorrel
Carolina geranium	Hoary plantain	Sheep sorrel	Woolly croton
Carpetweed	Hoary vervain	Shepherdspurse	Woolly plantain

BROADLEAF WEEDS			
Catchweed bedstraw	Knawel	Slender plantain	Wormseed
Catnip	Knotweed	Smallflower galinsoga	Yarrow
Catsear	Lambsquarters	Smooth dock	Yellow rocket
Chickweed, common	Lespedeza	Smooth pigweed	Yellowflower pepperweed
Chickweed, mouseear	Mallow	Sorrel	and other broadleaf weeds
Chicory	Matchweed	Sowthistle	

STORAGE AND DISPOSAL
Do not contaminate water, food, or feed by storage ~~or~~ and disposal.

PESTICIDE STORAGE: Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law ~~and may contaminate ground water~~. 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 Paper Bags, Plastic Bags, and Nonrefillable Bulk Bags - Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by State and local authorities by burning. If burned stay out of smoke.~~

CONTAINER HANDLING: Nonrefillable container: Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill, or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LIMITED WARRANTY AND DISCLAIMER

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

It is impossible to eliminate all risks inherently associated with use of this product. Damage to the treated article, ineffectiveness, or other unintended consequences can result from use of the product under abnormal conditions such as weather, presence of other materials, or the manner of use or application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS.** Buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

The manufacturer warrants only that this product conforms to the chemical description given on the label, and that the product is reasonably suited for the labeled use when applied according to the directions for use, subject to the inherent risks described below. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED.**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE

MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. The Manufacturer must be promptly notified in writing of any claims, whether based in contract, tort, negligence, strict liability, or otherwise, to be eligible to receive either remedy stated above.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere. No employee or agent of the manufacturer or seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Weight: _____
- EPA Est. No. _____
- [Guaranteed Analysis and other required fertilizer-related statements may be presented on the front panel of the container label. A sample Guaranteed Analysis and related statements are presented in the Appendix of this master label.]

2. Guaranteed Analysis:

GUARANTEED ANALYSIS XX-X-X	
Total Nitrogen (N).....	XX%
x.x% ammoniacal nitrogen	
x.x% urea nitrogen*	
Available Phosphate (P2O5).....	X%
Soluble Potash (K2O).....	X%
Sulfur (S).....	X%
x.x% free sulfur (S)	
Derived from: polymer-coated sulfur-coated urea, urea, ammonium phosphate, potassium chloride. *A portion of the urea has been coated to provide x.x% coated slow-release nitrogen. This product and/or its manufacture is covered by one or more of the following U.S. patents and international counterparts thereof: US Patent Numbers: xxxxxx FL-987	

GUARANTEED ANALYSIS 16-0-9	
Total Nitrogen (N).....	16.00%
16.00% urea nitrogen*	
Soluble Potash (K2O).....	9.00%
Sulfur (S).....	1.62%
1.62% free sulfur (S)	
Plant nutrients derived from urea, potassium chloride and polymer coated sulfur coated urea. Chlorine (Cl) Max 7.60% *4.00 % slowly available nitrogen from polymer coated sulfur coated urea. FL987	

Note: Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5 and K2O may include the following: 23-3-7 or x-x-x. The fertilizer grade analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.

3. State mandated fertilizer labeling requirements:

Association of American Plant Food Control Officials (AAPFCO):

- Information regarding the contents and levels of metals in this product is available on the internet at <http://www.aapfco.org/metals.htm> .

OR

- Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.regulatory-info-xx.com>

Each registrant shall substitute a unique alphanumeric identifier for "xx". This statement may be used only if the licensee establishes and maintains the Internet site: there is a clearly visible, direct hyperlink to a government website; and the Internet site contains no advertising or company specific information

States:

- Typically a lawn will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing ___ pounds of nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer program suitable to your geographical region.

~~For fertilizer grade 16-0-0, typically a lawn will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing 0.64 pounds of nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer program suitable to your geographical region.~~

4. Fertilizer Grades:

~~Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5, and K2O include the following:~~

16-0-0	22-4-4	26-4-4	26-4-4
19-0-3	25-0-5	23-4-6	22-2-5
22-0-6	25-4-5	23-0-5	22-4-5
22-0-17	25-4-5	26-0-4	21-4-6
22-0-17	25-0-6	26-0-5	

5. Advertising claims which may be presented on the container label, advertisements and/or promotional brochures for subregistered products.

- This product is a premium grade herbicide & plant nutrient combination which controls a wide spectrum of broadleaf weeds while providing both fast and long lasting feeding action.
- Combination of 4 active ingredients enhances speed of herbicide activity.
- Superior cool season performance.
- Controls tough broadleaf weeds.

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00882.20091005.notif-proposed.doc

2. Reason for Issue: Incorporate EPA comments