



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 8, 2018

Eric D. Smith  
Federal Registration Manager  
PBI/Gordon Corporation  
P.O. Box 014090  
Kansas City, MO 64101

Subject: Label Amendment – Typographical error correction, state fertilizer language, and general label reformatting  
Product Name: EH-1415 ORP  
EPA Registration Number: 2217-882  
Application Date: March 22, 2017  
Decision Number: 545306

Dear Mr. Smith:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

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 18 months from the date of this letter. After 18 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.

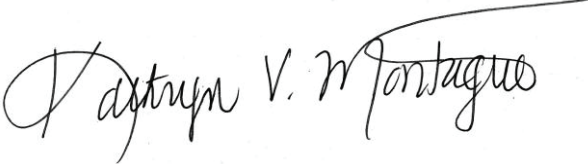
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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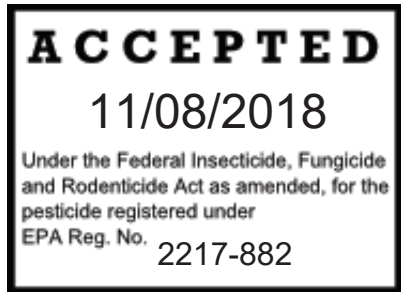
with FIFRA section 6. If you have any questions, please contact me by phone at 703-305-1243, or via email at [montague.kathryn@epa.gov](mailto:montague.kathryn@epa.gov) .

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kathryn Montague, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure



# EH-1415 ORP

## EPA Reg. No. 2217-882

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

**ACTIVE INGREDIENTS:**

2,4-D, 2-ethylhexyl ester .....	1.153%
Mecoprop-p acid .....	0.174%
Dicamba acid .....	0.073%
Sulfentrazone .....	0.034%
<b>OTHER INGREDIENTS:</b> .....	<u>98.566%</u>
<b>TOTAL</b> .....	<b>100.000%</b>

**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.**

See attached booklet for complete [Precautionary Statements and] Directions for Use, including Storage and Disposal, and back panel for [complete Precautionary Statements, including] First Aid. OR See back panel for complete Precautionary Statements, including First Aid, and Directions for Use, including Storage and Disposal.

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

**Company Name and Address:**  
PBI/Gordon Corporation  
1217 West 12<sup>th</sup> Street  
Kansas City, Missouri 64101



# **PRECAUTIONARY STATEMENTS**

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

**CAUTION:** Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing.

## **Personal Protective Equipment (PPE)**

All loaders, applicators, and other handlers must wear:

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

## **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:**

- 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:**

- 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 is 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.

## USE 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.
- 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 'Floritam' 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.

## 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 listed 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. Apply 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 listed rate 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. 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. 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. The equivalent application rates are 2.0 to 2.5 pounds of product per 1,000 square feet of turfgrass.

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

**APPLICATION DIRECTIONS:**

1. Spring and fall applications are suitable 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.

**[Begin Optional Language**

**(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.)

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.

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

**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 SETTINGS		
SPREADER	GROUND SPEED	WIDTH OF COVERAGE	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

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
	4.0	3,750		4.0	7,000
16	2.0	8,000	36	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
	3.6	4,400		3.6	10,000
	4.0	4,000		4.0	9,000
17	2.0	8,500	37	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
	3.4	5,000		3.4	10,900
	3.6	4,700		3.6	10,300
	4.0	4,250		4.0	9,250
18	2.0	9,000	39	2.0	19,500
	2.5	7,200		2.5	15,600
	3.0	6,000		3.0	13,000
	3.2	5,600		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



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.
20	2.0	10,000	40	2.0	20,000
	2.5	8,000		2.5	16,000
	3.0	6700		3.0	13,300
	3.2	6400		3.2	12,500
	3.4	5800		3.4	11,800
	3.6	5700		3.6	11,100
	4.0	5000		4.0	10,000
24	2.0	12,000	42	2.0	21,000
	2.5	9,600		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
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 yy pound bag covers up to XXXX 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.

**End Optional Language]**

**WEEDS CONTROLLED:**

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

<b>BROADLEAF WEEDS [158]</b>			
Annual yellow sweetclover	Cinquefoil	Mexicanweed	Spanishneedles
Aster	Clover, crimson	Milk vetch	Speedwell

**BROADLEAF WEEDS [158]**

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, oxeeye	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
Carpeweed	Hoary vervain	Shepherdspurse	Woolly plantain
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	
Chicory	Matchweed	Sowthistle	

**STORAGE AND DISPOSAL**

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

FOR USE ONLY AS DIRECTED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

# **APPENDIX**

## **1. Advertising claims that may be presented on container labeling, advertisements, brochures and other marketing/sales promotional materials:**

### Herbicide Benefit Claims:

- Combination of 4 active ingredients enhances speed of herbicide activity.
- Controls tough broadleaf weeds.
- Controls a broad spectrum of broadleaf weeds
- Spring & Fall weed control

### Fertilizer Benefit Claims:

- Granular weed and feed provides plant nutrition

### General Marketing Claims:

- This product is a herbicide & plant nutrient combination which controls a wide spectrum of broadleaf weeds while providing both fast and long lasting feeding action.
- Superior cool season performance.
- XCU® is registered trademark of Agrium.
- \* Information concerning the raw materials composing this product can be obtained by writing to the Guarantor listed below and referring to the item number found on this container.
- Contains SURGE® Broadleaf Herbicide
- EC Grow
- Apply in Spring and Fall
- XXX sq.ft. coverage
- 2 products in one!

### [St. Paul Brand Bag Claims:

- Home of the St. Paul Rodeo
- Manufacturers of Pro-Pell-It® Pelletized Lime, Dolomite, Gypsum
- Bagged & Bulk Dry Fertilizers
- Clear Liquid and Suspension Fertilizers
- Agricultural and Ornamental Chemicals
- Custom Application Services
- Delivery Service Available for Bagged & Bulk: Feed, Fertilizers, Chemicals
- Lime and Dolomite Application with High Flotation Buggies
- American Society of Agronomy Certified Crop Advisors
- Providing Quality Crop Recommendations
- Grass, Grain and Legume Seed Cleaning and Treating for Grain Warehousing and Marketing
- Custom Feed, Milling & Pelletizing
- Retail Farm Store: Lawn & Garden, Livestock & Pets, Wood Pellets, Water Softener Salts, Safety Supplies, BBQ Briquets, Rain Gear, Boots & Gloves, Traeger Pellets
- Call Today for Fast, Friendly Service]

## **2. State mandated fertilizer labeling requirements:**

**[Note to Supplemental Registrants: Please select the statements relevant to the areas of the country in which your specific product is registered and sold; if any of these statements are relevant to your labeling, please place in the Directions for Use under the heading “State Restrictions”]**

<b>GUARANTEED ANALYSIS XX-X-X</b>	
Total Nitrogen (N) .....	XX%
x.x% ammoniacal nitrogen	

x.x% urea nitrogen*	
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ) .....	X%
Soluble Potash (K <sub>2</sub> O) .....	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	

[Note: Fertilizer grades with nutrient contents expressed as the percentages of N, P<sub>2</sub>O<sub>5</sub> and K<sub>2</sub>O 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.]

- [For products containing Iron:] Keep this product off sidewalks, patios, driveways, etc. This fertilizer contains iron which will stain concrete and painted surfaces. If it comes in contact with concrete surface, 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.
- 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.
- California, Oregon, Washington: "Information regarding the contents and levels of metals in this product is available on the internet at <http://www.aapfco.org/metals.htm>"
- Florida: [Note to reviewer: maximum number of applications in this section is dually based upon maximum ai load as well as fertilizer analysis effect on maximum nitrogen rates in different regions in Florida]:
  - In North Florida: Do not exceed X\* applications per year on bermudagrass. Do not exceed X\* applications per year on centipedegrass. Do not exceed X\* applications per year on St. Augustine grass. Do not exceed X\* applications per year on zoysiagrass.
  - In Central Florida: Do not exceed X\* applications per year on bermudagrass. Do not exceed X\* applications per year on centipedegrass. Do not exceed X\* applications per year on St. Augustine grass. Do not exceed X\* applications per year on zoysiagrass.
  - In South Florida: Do not exceed X\* applications per year on bermudagrass. Do not exceed X\* applications per year on centipedegrass. Do not exceed X\* applications per year on St. Augustine grass. Do not exceed X\* applications per year on zoysiagrass.

\*Make no more than 2 applications per year. Do not exceed the maximum seasonal rate of 348 pounds (2.66 lb 2,4-D ae), 0.60 lb MCPP-p ae and 0.25 lb dicamba ae) per acre per season, excluding spot treatments.
- Florida: "Apply only to actively growing turf."
- Florida: "Check with your local Cooperative Extension Agency to obtain specific information on local turf best management practices. Check with your county or city government to determine if there are local regulations for fertilizer use."
- FLORIDA APPLICATIONS: We recommend that you follow the Florida Green Industries BMP's at [http://www.flaes.org/pdf/BMP\\_Book\\_final.pdf](http://www.flaes.org/pdf/BMP_Book_final.pdf) [Note to reviewer: This applies only to non-specialty type products]
- FLORIDA APPLICATIONS: We recommend that you follow the Florida Golf Course BMP's at <http://www.flaes.org/pdf/gfbbmp07.pdf> [Note to reviewer: This applies only to non-specialty type products]
- Idaho: "Apply only as directed"

- Kentucky: [Note to Supplemental Distributor: In Kentucky if the product supplies less than 1lb of Nitrogen per application, include the following:] A lawn typically 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 XX pounds of nitrogen per 1,000 square feet and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program."
- Maryland: "This fertilizer contains phosphorus and may not be used on turf in the state of Maryland except when 1) Providing nutrients to specific soils and target vegetation as determined to be necessary in accordance with a soil test that was conducted by a laboratory identified under § 8-803.7 of the Agriculture Article, Annotated Code of Maryland, performed no more than 3 years before the application; 2) Establishing vegetation for the first time, such as after land disturbance, provided the application is conducted in accordance with the recommended application rates established by the State; or 3) Reestablishing or repairing a turf area."
- New Jersey: "In the state of New Jersey, this product may be used only when 1) Providing nutrients to specific soils and target vegetation as determined to be necessary pursuant to a soil test conducted by a laboratory identified pursuant to subsection b. of section 6 of P.L.2010, c.112 (C.58:10A-66) and performed no more than three years before the application, and pursuant to the associated annual fertilizer recommendation issued by the New Jersey Agricultural Experiment Station at Rutgers, the State University; 2) Establishing vegetation for the first time, such as after land disturbance, provided the application is in accordance with the standards and requirements established under the "Soil Erosion and Sediment Control Act," P.L.1975, c.251 (C.4:24-39 et seq.) and the rules and regulations adopted pursuant thereto; 3) Reestablishing or repairing a turf area; or 4) Delivering liquid or granular fertilizer under the soil surface, directly to the feeder roots."
- New Hampshire: In the state of New Hampshire, this product may only be used on 1) Establishing new lawns, for repairing a lawn, for seeding, or for use when a soil test indicates a phosphorus deficiency.
- Virginia: "In the state of Virginia, this product may be used only on 1) Newly established turf areas from sod or seed during the first growing season; 2) Turf areas being repaired or renovated, and; 3) Turf areas where soil tests performed within the past three years indicate nutrient deficiency."
- (Virginia, Florida, Maryland, others): DO NOT APPLY NEAR WATER, STORM DRAINS, OR DRAINAGE DITCHES. DO NOT APPLY IF HEAVY RAIN IS EXPECTED. APPLY THIS PRODUCT ONLY TO YOUR LAWN/GARDEN. AND SWEEP ANY PRODUCT THAT LANDS ON THE DRIVEWAY, SIDEWALK, OR STREET, BACK INTO YOUR LAWN/GARDEN.

## **DOCUMENT CONTROL INFORMATION**

**1. Unique Label Identifier:** 002217-00882.20181101.notif-proposed-clean

**2. Reason for Issue:** EPA Comments #1

<b>Internal Usage Notes</b>
Associated Container Label: Supplemental Distributors