

2217-901

7/20/2010

1/20



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

James L. Kunstman, Ph.D.
PBI/Gordon Corporation
PO Box 014090
Kansas City, MO 64101

JUL 20 2010

Subject: Notification: Revised Disposal Instructions per PR Notice 2007-4; Revisions per Agency Letter of September 2, 2008
EH-1434 Herbicide
EPA Reg. No. 2217-901
Application, Dated May 14, 2010

Dear Dr. Kunstman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 for the subject product.

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label changes requested fall within the scope of the PR Notice. 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 call me directly at (703) 305-1243 or Susan Stanton of my staff at (703) 305-5218.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathryn Montague FOR".

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



United States
Environmental Protection Agency
 Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

2/20

Application for Pesticide - Section I

1. Company/Product Number <p style="text-align: center;">2217-901</p>	2. EPA Product Manager <p style="text-align: center;">Kathryn V. Montague</p>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <p style="text-align: center;">EH-1434 Herbicide</p>	PM# <p style="text-align: center;">Product Manager—Team 23</p>	
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 to _____ in position and labeling to: EPA Reg. No. _____ Product Name _____ <p style="text-align: center; font-size: 1.2em;">NOTIFICATION</p> <p style="text-align: center; font-size: 1.2em;">JUL 20 2010</p>	

Section - II

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

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

Labeling notification in response to Pesticide Registration Notice (PRN) 2007-4, Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal: Standards for Pesticide Containers and Containmentment.

Please refer to cover letter for details and certification statement.

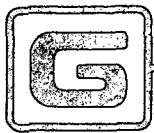
e-mail to jkunstman@pbigordon.com FAX: 816-421-2731

Section - III

1. Material This Product Will Be Packaged In:					
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	2. Type of Container <input checked="" type="checkbox"/> Metal <i>Not in metal container</i> <input checked="" type="checkbox"/> Plastic <i>per J. Kunstman 7/19/10</i> <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per Container		
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 to 55 gallons		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 checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input 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 May 14, 2010	



pbi / GORDON
CORPORATION

An Employee-Owned Company

1217 WEST 12TH STREET • P.O. BOX 014090
KANSAS CITY, MISSOURI 64101-0090
816-421-4070 • 1-800-821-7925
FAX: 816-474-0462

3/20

May 14, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202-4501
Attn: Kathryn V. Montague, PM-23

Dear Ms Montague:

SUBJECT: Labeling notification in response to Pesticide Registration Notice (PRN) 2007-4, Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal: Standards for Pesticide Containers and Containment. EH-1434 Herbicide (EPA Reg. No. 2217-901)

I. Your comments for labeling revisions on September 4, 2008: ✓

We have incorporated or merged the revisions for the draft labeling listed in the Agency's letter into the current document.

Co. didn't do this but it's not required. But should be a referral statement if not on front panel. Per Jim Kuntsman, the referral statement in the "Appendix" is used when First Aid isn't on front panel! (OK) S.H.S. 7/19/10

Comment 1) The First Aid statements should be placed with the "If Swallowed" statement immediately before the "If in Eyes" statement. Place the First Aid section in front of the Hazards to Humans and Domestic Animals section.

Response: The revised labeling was corrected according to your comments. [Page 2].

Comment 2) The mechanical transfer text (first two paragraphs) in the Engineering Control Statements section, is not required for 2,4-D.

Response: The revised labeling was corrected according to your comments. [Page 2].

Comment 3) Delete the text "except as noted on appropriate labels" from the Environmental Hazards section of the label.

Response: The revised labeling was corrected according to your comments. [Page 2].

Comment 4) 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 drift text appearing on the label must be placed together and be located below the required text currently on the label. Any text which conflicts with the required text must be deleted from the label.

Response: The revised labeling was corrected according to your comments. [Page 7].

Comment 5) To the label add the statement "Maximum of 2 applications per year, including broadcast applications in combination with spot treatments." (due to the presence of dicamba in the product).

Under the Restrictions and Limitations for Use in Turf section, add the following statement:

"Applications to non-cropland areas 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."

Response: The revised labeling was corrected according to your comments. [Page 12].

Comment 6) To the label add "Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition, et. al. v. EP, CO1-0132C, (W.D. WA). For further information, please refer to <http://www.epa.gov/espp/wtc>."

Response: The revised labeling was corrected according to your comments. [Page 4].

Comment 7) To the Warranty section add "to the extent consistent with applicable law" in front of "the exclusive remedy" and "the manufacturer neither makes nor".

Response: The revised labeling was corrected according to your comments. [Page 14].

5/20

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

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 pages 13-14 of the draft labeling.

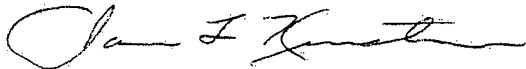
Certification: This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand 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.

III. Enclosures:

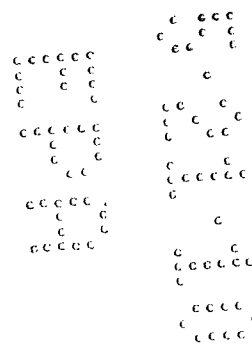
1. Application for Pesticide Amendment (EPA Form 8570-1)
2. Certification with Respect to Label Integrity, and CD containing PDF copy of proposed label.
3. One (1) annotated version of the draft labeling and
4. One (1) version of the draft labeling without notations

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



6/20

EH-1434 HERBICIDE

NOTIFICATION

JUL 20 2010

EPA Reg. No. 2217-901

ACTIVE INGREDIENT:

2,4-D, dimethylamine salt	11.96%
Quinclorac	5.65%
Dicamba, dimethylamine salt	1.37%
INERT INGREDIENTS:	81.02%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.88 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 9.93%
 - 0.50 lb 3,7-dichloro-8-quinolinecarboxylic acid per gallon or 5.65%
 - 0.10 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 1.14%
- Isomer Specific by AOAC Method.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

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

Personal Protective Equipment

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

- long-sleeved shirt and long pants,
- shoes and socks, plus
- chemical-resistant gloves (except for applicators using ground boom equipment)
- chemical resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

See engineering controls for additional requirements.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.



Engineering Control Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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 on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 - 20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-800-5556 for emergency medical treatment information.

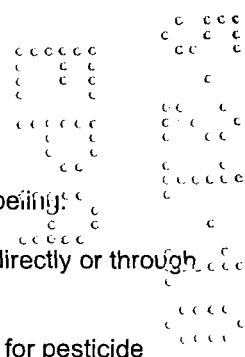
Environmental Hazards

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. 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.

Physical And Chemical Hazards

Combustible. Do not use or store near heat or open flame.



DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170.

This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- coveralls worn over short-sleeved shirt and short pants,
- chemical-resistant footwear plus socks,
- chemical-resistant gloves made of any water-proof material,
- chemical-resistant headgear for overhead exposure,
- protective eyewear.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Reentry Statement: Do not enter or allow people (or pets) to enter the treated area until sprays have dried.

PRODUCT DESCRIPTION:

3-in-1 Herbicide

EH-1434 Herbicide contains three (3) active ingredients including quinclorac that broaden the spectrum of weed control to include grassy and broadleaf weeds. EH-1434 Herbicide is a versatile herbicide that will control many troublesome grassy and broadleaf weeds in established turfgrass when used as directed.

- Versatile post-emergent herbicide for turfgrass to control both grassy and broadleaf weeds.
- Wide window of application for broadleaf weeds beginning at emergence and active weed growth.
- Quinclorac is absorbed by foliage and roots and translocated throughout the plant where it uses multiple modes of action to control both grassy and broadleaf weeds. One mode of action involves an auxin-type activity which disrupts plant growth in broadleaf weeds, while another mode of action works as an enzyme/cell wall disruptor to control crabgrass and other grassy weeds.
- The effects on grassy weeds include stunting, chlorosis, gradual reddening and followed by necrosis. Symptoms typically appear 7 to 14 days after application.
- The symptoms of susceptible broadleaf weeds resemble those of 2,4-D and include leaf and stem curl or twisting and chlorosis.

WHERE TO USE:

This product provides selective broadleaf control in warm-season and cool-season turfgrass in five (5) use sites.

- **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.

- **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.
- **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 and roughs), and office buildings.
- **Non-cropland sites** include highway rights-of-way (principal, interstate, county, private, and unpaved roads); roadsides, roadside ditches, road shoulders, road embankments, dividers and medians; municipal, state and federal lands; airports and military installations.
- **Agricultural site:** Commercial sod production

Established turfgrass: EH-1434 Herbicide can be applied as a broadcast treatment to the following established turfgrass species:

Cool season turfgrass	Warm season turfgrass
Kentucky bluegrass Perennial ryegrass Fine fescues in blends/mixtures of red, hard and chewing fescue Tall fescue Annual bluegrass (<i>Poa annua</i>) Rough bluegrass (<i>Poa trivialis</i>)	Bermudagrass, common and hybrid Zoysiagrass Buffalograss

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).
- 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.

DO NOT apply EH-1434 Herbicide to the following:

Cool season turfgrass	Warm season turfgrass	Other areas
Bentgrass, creeping Bentgrass, colonial	St. Augustinegrass Bahigrass Centipedegrass Carpetgrass Seashore paspalum	Putting greens, tees and collars at golf courses Lawns with desirable clovers or legumes Dichondra Ornamentals (flowers, trees, groundcovers, landscape beds and shrubs)

Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in *Washington Toxics Coalition, et.al. v. EPA*, CO1-0132C, (W.D. WA). For further information, please refer to <http://www.epa.gov/espp>.

Turfgrass tolerance:

- Turfgrass tolerance to this product may vary, and temporary turfgrass yellowing may occur on hybrid bermudagrass and the fine fescues.
- Tolerant turf species listed on this label may exhibit temporary turf injury. The best tolerance occurs under optimal conditions for the turfgrass. Adverse environmental conditions may reduce the selectivity on the turfgrass. Injury may occur under marginal conditions (e.g. low temperatures and drought stress) or under extreme conditions (e.g. high temperatures and high humidity). 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.
- Certain spray tank additives (adjuvants, wetting agents, and surfactants), liquid fertilizers, and tank mixtures containing emulsifiable concentrates may reduce the selectivity on the turfgrass. Use

adjuvants and spray additives or tank-mix combinations only when your experience indicates that the tank mixture will not result in objectionable turf injury.

- Do not broadcast apply this product when temperatures are above 90°F; some injury can also be expected with spot treatments when air temperatures exceed 90°F.

CULTURAL TIPS:

For newly seeded areas:

Delay application of this product to grass seedlings until after the second or third mowing, or 4 weeks after emergence.

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.

Seeding:

Turf species listed on this label can be seeded into the treated areas at four (4) weeks after the application of this product.

Irrigation:

- Do not apply this product through any type of irrigation system.
- Do not apply this product immediately before rainfall or irrigation.
- **Rainfast period:** Rainfall or irrigation occurring within six (6) hours after application of this product may reduce the effectiveness.
- If dry conditions exist, a scheduled irrigation or watering 24 hours before and 24 hours after application is recommended.
- If rainfall does not occur in 2 to 7 days after application, irrigation will help to optimize weed control.

Mowing:

Delay mowing 2 days before and until 2 days after the application of this product. Additional stress from low mowing heights may increase the possibility of turf injury.

Clippings from the first three mowings should be left on the treated area. Do not use these clippings as mulch or compost around flowers, ornamentals, trees, or in vegetable gardens.

SPRAY PREPARATION:

Mixing with water:

Add one-half the required amount of water to the spray tank, then add EH-1434 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.

Mixing with liquid fertilizers:

In certain applications, liquid fertilizer may replace part of the water as a diluent.

ALWAYS PREMIX EH-1434 Herbicide WITH WATER BEFORE ADDING TO FLUID FERTILIZERS. 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.

[Optional text]

Additions of Adjuvants (and/or Tank Mixtures) to Improve Grassy Weed Control:

Methylated seed oil may be a suitable adjuvant for post-emergent applications and may cause slight yellowing to desirable turf. Liquid iron and chelated iron or sprayable soluble nitrogen can reduce the slight yellowing that may occur on some turfgrass species. Methylated seed oil used must meet the following criteria:

- Be non-phytotoxic
- Contain only EPA-approved ingredients
- Provide good mixing quality in the jar test, and
- Be used only when your experience indicates that this tank mixture will not result in objectionable turfgrass injury.

Do not include additives when tank-mixing with oil-based products or emulsifiable concentrate (EC) formulations as this may cause phytotoxicity (yellowing) of desirable turfgrass. Other additives or adjuvants may be used, however, certain additives may reduce the selectivity on the turfgrass. Use these adjuvants, spray additives or tank-mix combinations, only when your experience indicates that the tank mixture will not result in objectionable turf injury.

GROUND EQUIPMENT:

Spray equipment: 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.

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. Calibration and proper application are essential when using this product.

Cleaning spray equipment: Clean sprayer before and after using this product. Use soap, household ammonia, detergent and water, or an approved spray tank cleaner and rinse thoroughly. Cross-contamination may cause physical incompatibility (mixing problems) or result in turf injury.

Spray volumes: Use 20 to 220 gallons per acre (0.5 to 5.0 gallons per 1,000 sq.ft.) 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 sq.ft.)

Spray distribution:

- The accuracy and uniformity of the herbicide distribution is the sole responsibility of the applicator.
- Uniform applications are essential when using this product. Over-application, excessive overlaps, or rates above those specified on this label can cause turf injury.
- Avoid spray overlaps with hand-held equipment: 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. To avoid excessive spray pattern overlaps, use a spray colorant.
- 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).

Aerial application: Do not apply as an aerial application.

Spray Drift Management

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application 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 crop canopy.

POSTEMERGENT CONTROL OF GRASSY WEEDS

EH-1434 Herbicide can provide postemergent control and suppression of certain grassy weeds in turfgrass. Apply this product to weeds that are young and actively growing for best results (see Table 1). Applications under adequate soil moisture conditions are preferred to summer treatments.

Broadcast or spot treatments with single or sequential applications will control or suppress these grass weeds:

- Crabgrass, (large and smooth)
- Foxtail, (green, yellow and giant)
- Signalgrass, (broadleaf)

13/20

Barnyardgrass

Weed control is affected by the spray volume, spray schedule and the weed growth stages. Generally, apply this product to actively-growing weeds during the early growth stages for the best results.

EH-1434 Herbicide can be applied from emergence to the 2 to 3 tiller stage of crabgrass and other annual, susceptible grasses listed on this label. Applications beyond the 3 to 4 tiller stages of the listed species may not provide adequate control.

For crabgrass and foxtail: Apply this product from emergence (1 leaf) until the 6 leaf stage (2 tiller) for the best results.

For broadleaf signalgrass and barnyardgrass: Apply this product from the 3 leaf stage until the 7 leaf stage (3 tiller) for the best results.

SPRAY VOLUMES: IMPORTANT - Use 50 to 220 gallons per acre (1.2 to 5.0 gallons per 1,000 sq.ft.) 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).

SPRAY SCHEDULE: Use single applications for light infestations and sequential applications for dense infestations. The use rates for single and sequential applications are presented in Table 2.

Sequential applications: Sequential (or followup applications) if needed as either broadcast or spot treatments should be made between 14 to 21 days after the initial application and are recommended for more mature weeds, for dense infestations and for adverse environmental conditions. Other situations which may indicate the need for sequential applications include:

- Under certain conditions, applications of this product at the 3 to 4 tiller stage of the annual grasses may not provide complete control.
- All weed grasses do not germinate at the same. The period of germination for crabgrass and annual grasses can extend into the summer after the initial application of this product and results may be poor and erratic.
- Dense infestations of weeds may prevent thorough spray coverage of the target weeds and regrowth occurs.
- Biotypes of large and smooth crabgrass in California have shown varied response to quinclorac. If control failure occurs following a sequential application, do not reapply this product. Change to a herbicide with a different mode of action such as Gordon's Trimec Plus Post-Emergent Grass & Broadleaf Herbicide [or brandname X product].

Extremes in environmental conditions, ie. temperature and moisture, soil conditions, and cultural practices may affect the activity of this product. Under warm moist conditions, herbicide symptoms may be accelerated. Under dry conditions, the expression of herbicide symptoms is generally delayed, and weeds hardened off by drought may be less susceptible to this product.

If objectionable turf injury occurs with the first application under a sequential program, then avoid making the second application of this product until the turfgrass recovery is complete.

Do not broadcast apply this product when temperatures are above 90°F; some injury can also be expected with spot treatments when air temperatures exceed 90°F.

WEED GROWTH STAGES: See Table 1 below for the optimum weed growth stage to treat for best control and efficacy.

14/20

TABLE 1. LEAF STAGES OF GRASSY WEEDS FOR OPTIMUM CONTROL WITH THIS PRODUCT.

Weed species	1 to 3 leaf	4 to 5 leaf (1 tiller)	6 leaf (2 tillers)	7 leaf (3 tillers)	8 leaf (4 tillers)
Barnyardgrass Crabgrass, (large and smooth) Foxtail, (green, yellow and giant) Signalgrass, (broadleaf)	X	X	X	Footnote 1	Footnote 1 (reduced control)

¹Sequential applications may be required at 14 to 21 days with a maximum of two broadcast applications per year.

TABLE 2. USE RATES FOR GRASSY WEEDS IN TURF

Turf Species EH-1434 Herbicide Can be Used On

Cool-season Turf: Kentucky bluegrass, perennial ryegrass, fescues, annual bluegrass (<i>Poa annua</i>) rough bluegrass (<i>Poa trivialis</i>) annual ryegrass	Warm-season Turf: hybrid bermudagrass, common bermudagrass zoysiagrass, buffalograss
--	---

Do not apply this product to warm-season turfgrass during spring green-up or in the fall during transition period between active growth and dormancy.

Dormant turf: This product may be applied to fully dormant bermudagrass, fully dormant zoysiagrass, and fully dormant buffalograss

Single and Sequential Application Details:

Application schedule	Rates	Spray Volume*	Maximum number of broadcast applications	Application Interval, days
Single	7 to 8 pints/A or 2.6 to 3.0 fl.oz./1000 sq.ft.	50 to 220 gal/A or 1.2 to 5.0 gal/1000 sq.ft.	2	--
Sequential	First application: 7 to 8 pints/Acre plus Second application: 7 to 8 pints/Acre or First Application: 2.6 to 3.0 fl.oz./1,000 sq.ft. plus Second application: 2.6 to 3.0 fl.oz./1,000 sq. ft.	20 to 220 gallons/acre or 0.5 to 5.0 gals./1,000 sq.ft.	2	14 to 21 days

*Note: Use the higher spray volumes for dense weed populations

SPOT TREATMENTS FOR GRASSY WEEDS:

- Calibration and proper application are essential when using this product. Spray coverage should be uniform and complete.
- Over applications can result in turfgrass injury.
- Mix 2.6 to 3.0 fl.oz. of this product with 1.0 gallon of water for treatment of approximately 1,000 sq. ft. of turfgrass. Apply to actively growing weeds during the early growth stages as shown in Table 1.

TANK MIXTURES FOR GRASSY WEEDS

Pre-emergent herbicides with residual activity for crabgrass and annual grasses: This product can be tank-mixed with EPA-registered preemergent herbicides (if compatible) to provide extended preemergent control. Do not exceed the specified dosage rates.

Physical incompatibility, reduced weed control or turf injury may result from mixing this product with other pesticides (fungicides, herbicides and insecticides) adjuvants, additives, or fertilizers. Refer to manufacturer's labels for specific use directions, precautions and limitations before tank mixing with this product and follow those that are most restrictive.

Post-emergent herbicides for grassy control: DO NOT tank mix this product with other post-emergent herbicide EPA-registered for grassy control in turfgrass.

NOTE: The most restrictive labeling applies to any tank mixture. Consult tolerant turfgrass species on all labels. Separate applications should be made if all target weeds are not at the correct growth stage for treatment at the same time.

POST EMERGENT CONTROL OF BROADLEAF WEEDS:

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.

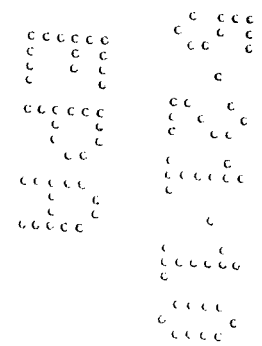
Sequential application: Sequential (or follow-up) applications as broadcast or spot treatments are recommended for more mature weeds, for dense infestations, and for adverse environmental conditions.

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.

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.

HOW MUCH TO USE:

See Table 3 for use rates and spray volumes for post-emergent application to broadleaf weeds. Generally, the lower application rates within the specified range will provide satisfactory control of sensitive weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds hardened off or more mature.



16/20

Table 3. USE RATES FOR BROADLEAF WEEDS IN TURF

Turf Species			
Cool-season Turf: Kentucky bluegrass, perennial ryegrass, fescues, annual bluegrass (<i>Poa annua</i>) rough bluegrass (<i>Poa trivialis</i>) annual ryegrass		Warm-season Turf: hybrid bermudagrass, common bermudagrass zoysiagrass, buffalograss	
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 buffalograss.			
Single and Sequential Applications			
Application schedule	RATES	Spray volume	Maximum number of broadcast applications
Single	7 to 8 pints/Acre or 2.6 to 3.0 fl.oz./1,000 sq.ft.	20 to 220 gallons/acre or 0.5 to 5.0 gals./1,000 sq.ft.	2
Sequential	First application: 7 to 8 pints/Acre plus Second application: 7 to 8 pints/Acre or First Application: 2.6 to 3.0 fl.oz./1,000 sq.ft. plus Second application: 2.6 to 3.0 fl.oz./1,000 sq.ft.	20 to 220 gallons/acre or (0.5 to 5.0 gals./1,000 sq.ft.)	2

SPOT TREATMENTS FOR BROADLEAF WEEDS:

- Calibration and proper application are essential when using this product. Spray coverage should be uniform and complete.
- Over applications can result in turfgrass injury.
- Mix 2.6 to 3.0 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 actively growing.

RESTRICTIONS AND LIMITATIONS FOR USE IN TURF

EH-1434 Herbicide contains the dimethylamine salt of 2,4-D combined with two other active ingredients. The maximum allowable application rates for the dimethylamine salt of 2,4-D and the dimethylamine salt of dicamba associated with three specific use patterns are presented as follows:

Turf sites	Application schedule	Maximum application rate	Maximum number of applications per year	Days between applications	Maximum seasonal application rate excluding spot treatments
Ornamental turfgrass (golf courses, cemeteries, parks, sports fields, lawns and other grass areas)	Broadcast	8.0 pints/A (0.88 lb 2,4-D ae/A) (0.10 lb dicamba ae/A)	2	NA	16 pints/A (1.76 lb 2,4-D ae/A) (0.20 lb dicamba ae/A)

17/20

Turf sites	Application schedule	Maximum application rate	Maximum number of applications per year	Days between applications	Maximum seasonal application rate excluding spot treatments
Turf grown for grass seed or sod farms	Broadcast	8.0 pints/A (0.88 lb 2,4-D ae/A) (0.10 lb dicamba ae/A)	2	21 days	16 pints/A (1.76 lb 2,4-D ae/A) (0.20 lb dicamba ae/A)
Turfgrass in non-cropland (roadsides, ditches, rights-of-way, utility power lines, railroads, airports, and industrial sites)	Broadcast	8.0 pints/A (0.88 lb 2,4-D ae/A) (0.10 lb dicamba ae/A)	2	30 days	16 pints/A (1.76 lb 2,4-D ae/A) (0.20 lb dicamba ae/A)

Maximum of 2 applications per year, including broadcast applications in combination with spot treatments.

Applications to non-cropland areas 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.

WEEDS CONTROLLED:

EH-1434 Herbicide will control or suppress the following. Apply when weeds are young and actively growing.

WEEDS			
Aster, white heath & white prairie	Dollarweed (*pennywort)	Lawn burweed	Shepherdspurse
Barnyardgrass	English Daisy	Lespedeza, common	Signalgrass
Bedstraw	False dandelion (*spotted catsear & common catsear)	Mallow, common	(Broadleaf)
Beggarweed, creeping	Field bindweed	Matchweed	Speedwell *Veronica
Bindweed	(*morningglory & creeping jenny)	Morningglory spp.	(Common, Slender and
Black medic	Field oxeye-daisy	Mouseear chickweed	Thymeleaf)
Broadleaf plantain	(*creeping oxeye)	Old world diamond flower	Spurge
Buckhorn plantain	Filaree, whitestem & redstem	Oxalis (*yellow woodsorrel & creeping woodsorrel)	Thistles
Bull thistle	Florida betony	Parsley-piert	Virginia buttonweed
Burdock, common	Florida pusley	Pennsylvania smartweed	White clover (*Dutch clover, honeysuckle clover, white trefoil, & purplewort)
Buttercup, creeping	Foxtail	Pepperweed	Wild carrot
Carpetweed	(green, yellow and giant)	Pigweed	Wild garlic
Chickweed, common	Ground ivy	Pineappleweed	Wild geranium
Chicory	Groundsel	Plantain	Wild lettuce
Cinquefoil	Geranium (Carolina)	Poison ivy	Wild mustard
Clovers	Hawkweed	Poison oak	Wild onion
Crabgrass ¹ (large and smooth)	Healall	Prickly lettuce (*compass plant)	Wild strawberry
Curly dock	Henbit	Puncturevine	Wild Violet
Dandelion	Innocence (Blue-eyed Mary)	Purple cudweed	Yarrow
Dayflower	Knotweed	Purslane	Yellow rocket
Deadnettle	Lambsquarters	Ragweed	and many more broadleaf weeds
Dock		Redweed	
Dogfennel		Red sorrel (*sheep sorrel)	

*Synonyms
¹Biotypes of large and smooth crabgrass in California have shown varied response to quinclorac. If control failure occurs following a sequential (or follow-up) application, do not reapply this product. Change to a herbicide with a different mode of action such as Gordon's Trimec Plus Post-Emergent Grass & Broadleaf Herbicide (EPA Reg. No. 2217-709).

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your state Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

[For Plastic Containers – Nonrefillable with capacities equal to or less than 5 gallons:]

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

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

[OR

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

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]

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

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

[OR

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

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. 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 WARRANTY STATEMENT 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.

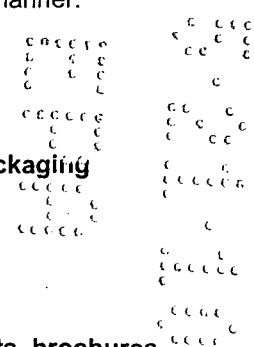
APPENDIX

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

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: _____
- EPA Est. No. _____

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

- Water-based formula
- Water-based formulation



- Proven performance
- Consistently fast control on tough weeds like dandelion, spurge, clover, plantain, ground ivy and [various other listed weeds].
- Controls grass and broadleaf weeds "All-In-One"
- "Three-In-One" or "3-in-1"
- Controls crabgrass, foxtail and signalgrass
- For information call XXX-XXX-XXXX [contact www.xxx-xxxx.com]

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00901.20100514.notif-proposed-clean.doc
2. **Reason for Issue:** Incorporate EPA comments, PRN 2007-4

