



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 27, 2015

Eric D. Smith  
Federal Registration Manager  
PBI/Gordon Corporation  
PO Box 014090  
Kansas City, Missouri 64101

Subject: Label Amendment – Revised Directions for Use  
Product Name: EH-1468 ORP  
EPA Registration Number: 2217-923  
Application Date: May 6, 2015  
Decision Number: 505199

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 Sarah Meadows by phone at 703-347-0505, or via email at [meadows.sarah@epa.gov](mailto:meadows.sarah@epa.gov).

Sincerely,

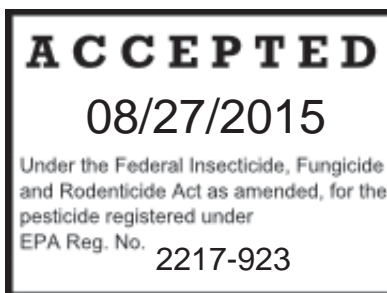


Reuben Baris, Product Manager 25  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# EH-1468 ORP

## EPA Reg. No. 2217-923



Alternate Brand Name: Gordon's Pronto Vegetation Killer, Pronto Vegetation Killer

**ACTIVE INGREDIENTS:**

Imazapyr, isopropylamine salt .....	1.74%
Glyphosate, isopropylamine salt .....	3.82%
OTHER INGREDIENTS: .....	94.44%
TOTAL .....	100.00%

**THIS PRODUCT CONTAINS:**

- 0.12 lb Imazapyr (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1H-imidazol-2-yl]-3-pyridinecarboxylic acid) per gallon or 1.42%
- 0.24 lb Glyphosate (N-(phosphonomethyl)glycine) per gallon or 2.83%

### 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 & Domestic Animals

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

### Personal Protective Equipment (PPE)

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

- long-sleeved shirt and long pants,
- shoes and socks,
- chemical-resistant gloves for all mixers and loaders, plus applicators using handheld equipment.

### 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.

#### 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.
- 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.

<b>First Aid</b>	
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency, call toll free 1-877-800-5556.	

### **Environmental Hazards**

This product is toxic to plants. Drift and run-off may be hazardous to plants in water adjacent to treated areas. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters or rinsate. See Directions for Use for additional precautions and requirements.

### **Physical or 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.

### **1. Product Application Restrictions**

- Do not enter or allow others to enter treated areas until sprays have dried.
- 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.
- Do not use on feed or food crops.

### **2. Product Information [What It Does]**

EH-1468 ORP is a nonselective herbicide which kills most annual and perennial grasses, broadleaf weeds, vines, brush, and trees. The product is absorbed through leaves, stems, and roots and moves throughout the plant. Treated plants stop growing soon after application. EH-1468 ORP will also provide residual control for up to 12 months in the treated area. Heavy rainfall will reduce the length of residual control. Heavy clay soils may increase the length of residual control.

### **3. Use Sites [Where To Use]**

EH-1468 ORP may be used to control weeds in: [In fencerows, hedgerows, agricultural uncultivated areas, shelter belts, farm yards, and farm premises. Around domestic (residential) dwellings, outdoor buildings, structures and shelters such as beef barns, hog barns, dairy barns, stables, dog kennels and poultry houses. Along fences of paddocks, corrals, feedlots, and livestock holding areas. For the establishment and maintenance of wildlife openings. In roadways, roadsides, airports, landing fields, industrial sites, storage yards, lumber yards, tank farms, pumping installations, fuel tanks, pipelines, non-agricultural uncultivated areas or soils, paved areas (including crack and crevice), curbs, sidewalks, driveways, parking areas, brick walks, gravel paths, paths, patios, and vacant lots, urban areas, cemeteries, recreational areas, play areas, and tennis courts. Along fences.]

**IMPORTANT:** Use only in areas where you want to 1) kill all existing vegetation and 2) suppress regrowth for up to 12 months. Do not use in gardens, flower beds or in areas intended to be seeded or planted within 12 months. Newly planted trees, shrubs and flowers are especially sensitive. This product is not intended for treating aquatic plants. In lawns, do not use for individual weed control.

## 4. Application Directions

The maximum number of applications is 1 broadcast and 1 spot treatment per year OR 2 spot treatments per year OR 1 brush control application per year. The maximum annual rate is 36 fl.oz. of this product per 1,000 sq.ft. per year [1.47 lbs imazapyr ae/A/yr, 2.94 lbs glyphosate ae/A/yr].

**Equipment Cleanup:** Thoroughly flush application equipment with water after using this product. Do not flush equipment near desirable plants or their root zones.

### 4.1 For Total Vegetation Control (Including Bareground Treatment)

Use hand-operated spray equipment such as backpack sprayers, pump-up sprayers, or sprinkling can. For maximum herbicide activity: 1) Weeds should be growing vigorously at the time of application 2) Apply 1/4 to 1/2 inch of irrigation 4 to 24 hours after application [3) Addition of a surfactant to the spray solution will enhance performance.]

**For Broadcast Treatments:** 18 fl.oz. of product will cover 1000 sq.ft. Mix 18 fl.oz. of product [0.74 lb imazapyr ae/A, 1.47 lb glyphosate ae/A] with water to produce 1 to 5 gallons of spray solution and spray uniformly over 1000 sq.ft.

**For Spot Treatments:** Apply no more than 18 fl.oz. of product per 1000 sq.ft. Mix 18 fl.oz. of product [0.74 lb imazapyr ae/A, 1.47 lb glyphosate ae/A] with water to produce 1 to 5 gallons of spray solution and spray the foliage of clumps of weeds. 1 spot treatment may be used after a broadcast treatment to control weed escapes.

### 4.2 For Brush Control

Use hand-operated spray equipment such as backpack sprayers or pump-up sprayers. Mix 36 fl.oz. of product [1.47 lbs imazapyr ae, 2.94 lbs glyphosate ae] with water to produce 1 gallon of spray solution. Uniformly spray the foliage of woody weeds. Excessive wetting of foliage is not recommended. Weeds should be growing vigorously at the time of application for maximum herbicide activity. [Addition of a surfactant to the spray solution will enhance performance.]

## 5. For All Application Types: Avoiding Injury to Non-Target Plants

Movement of the product from the target plant or site may injure non-target plants. Follow these precautions to manage off-target movement.

1. **Runoff:** Do not over apply causing runoff from the treated foliage. Do not apply to slopes.
2. **Spray Drift:** Spray drift from applying this product may result in damage to sensitive plants adjacent to the treatment area. Avoiding spray drift is the responsibility of the applicator.
  - Applicators are required to use a nozzle height below 4 feet above the ground or plant canopy and Coarse or coarser droplet size (ASABE S572) or, if specifically using a spinning atomizer nozzle, applicators are required to use a volume mean diameter (VMD) of 385 microns or greater.
  - Applications with wind speeds greater than 10 mph are prohibited.
  - Applications into temperature inversions are prohibited.
3. **Roots of Trees and Shrubs:** Untreated plants can be affected by root uptake. Do not use over the root zone of desirable trees and shrubs. Roots extend beyond the drip line and can extend under fences, driveways, patios, sidewalks, paths, and similar landscape elements.
4. **Movement of Treated Soil:** Do not treat powdery, dry or light sandy soils when the soil may be blown by wind. If necessary soil surface should be settled by rain or irrigation.

## 6. Weeds Controlled

EH-1468 ORP will control or suppress most grasses, broadleaf weeds, woody brush, vines, and trees. The degree of control and residual varies by plant species. [List of weeds controlled:]

[Optional weed list table. Some or all may be included on label.]

<b>GRASSES</b>			
Annual bluegrass	Crowfootgrass	Itchgrass	Sandbur
Bahiagrass	Dallisgrass	Johnsongrass	Smooth brome
Barnyardgrass	Downy brome	Kentucky bluegrass	Timothy
Beardgrass	Fall panicum	Lovegrass	Torpedograss
Bermudagrass	Feathertop	Orchardgrass	Vaseygrass
Big bluestem	Fescue	<i>Panicum</i> spp.	Wild barley
Broadleaf signalgrass	Foxtail	Prairie cordgrass	Wild oats
Canada bluegrass	Giant reed	Prairie threeawn	Wirestem muhly
Cheat	Goosegrass	Quackgrass	Witchgrass
Cogongrass	Guineagrass	Reed canarygrass	Woolly cupgrass
Crabgrass	Italian ryegrass	Sand dropseed	

<b>BROADLEAF WEEDS</b>			
Arrowwood	Dogfennel	Mullein	Smartweed
Broom snakeweed	Fiddleneck	Nettleleaf goosefoot	Sorrell
Bull thistle	Filaree	Oxeye daisy	Sowthistle
Burclover	Fleabane	Pepperweed	Spurge, annual
Burdock	Giant ragweed	Pigweed	Stinging nettle
Camphorweed	Goldenrod	Plantain	Sunflower
Canada thistle	Gray rabbitbrush	Pokeweed	Sweet clover
Carolina geranium	Henbit	Primrose	Tansymustard
Carpetweed	Hoary vervain	Puncturevine	Texas thistle
Chickweed, mouseear	Horseweed	Purple loosestrife	Velvetleaf
Clover	Indian mustard	Purslane	Western ragweed
Cocklebur	Japanese	Pusley, Florida	Wild carrot
Common chickweed	bamboo/knotweed	Rocket, London	Wild lettuce
Common ragweed	Knotweed, prostrate	Rush skeletonweed	Wild parsnip
Cudweed	Kochia	Russian knapweed	Wild turnip
Dandelion	Lambsquarters	Russian thistle	Woollyleaf bursage
Desert camelthorn	Little mallow	Saltbush	Yellow starthistle
Diffuse knapweed	Milkweed	Shepherdspurse	Yellow woodsorrel
Dock	Miner's lettuce	Silverleaf nightshade	

<b>VINES</b>			
Field bindweed	Poison ivy	Virginia creeper	Wild rose (Including: Multiflora and Macartney rose)
Hedge bindweed	Redvine	Wild buckwheat	
Honeysuckle	Trumpet creeper	Wild grape	
Morningglory			

<b>WOODY BRUSH AND TREES</b>			
Alder	Chinaberry	Madrone	Sassafras
American beech	Chinese tallow-tree	Maple	Sourwood
Ash	Chinquapin	Melaleuca	Sumac
Aspen	Cottonwood	Mulberry	Sweetgum
Autumn olive	Cypress	Oak	Sycamore
Bald cypress	Dogwood	Persimmon	Tanoak
Bigleaf maple	Eucalyptus	Poison oak	Titi
Birch	Hawthorn	Popcorn-tree	Tree of heaven
Black oak	Hickory	Poplar	<i>Vaccinium</i> spp.
Blackgum	Huckleberry	Privet	(Including: Blueberry and Sparkleberry)
Boxelder	<i>Lyonia</i> spp. (Including: Fetterbush and Staggerbush)	Red alder	Willow
Brazilian peppertree		Red maple	Yellow-poplar
Ceanothis		Saltcedar	
Cherry			

End optional weed list table.]

## **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. Keep from freezing.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable federal, state, or local procedures.

**CONTAINER HANDLING:** Nonrefillable container: Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. 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. 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.

## **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 STATEMENT cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

[alternate warranty]

## **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 or use of 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 OF 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 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 THE 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 will 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:**

- Offers long-term weed control in places where no growth is wanted
- Kills [Controls] [unwanted] [weeds], [brush], [plants], and [grasses]
- Prevents weeds and vegetative growth for up to 1 year.
- Apply only where no vegetation growth is wanted for up to 1 year.
- Kills [Controls] all vegetation
- XX fl.oz. of product treats up to YYYY sq.ft
- Covers [Treats] XXXX sq.ft.
- Covers [up to] XXXX sq.ft.
- Year-long control of tough weeds & brush
- For driveways, patios, fence rows, and other places where no vegetation is desired.
- Use Where No Growth Is Desired
- Knockdown plus residual
- Fencerows, Driveways, And More Sites As Listed . . . Farmyards, Around Buildings, Storage Areas
- Dual-Action technology kills and prevents weeds, grass and brush for [season-long control] [up to 12 months]
- Season-long control of tough weeds, grass, and brush
- Goes to the roots to stop growth fast
- Apply where no vegetation is desired in areas such as fencerows, driveways, around buildings, propane tanks, around storage areas, farmyards, parking areas, patios, and pathways, [and more areas listed on label].





## **DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-00923.20150812.amend-proposed-clean

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