



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 23, 2018

Eric D. Smith
Director, Regulatory Affairs
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, MO 64101

Subject: Label Amendment – Updates including state mandated fertilizer statements
Product Name: EH-1470 Professional
EPA Registration Number: 2217-927
Application Date: 9/29/2017
Decision Number: 534454

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.

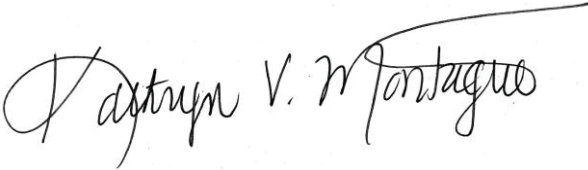
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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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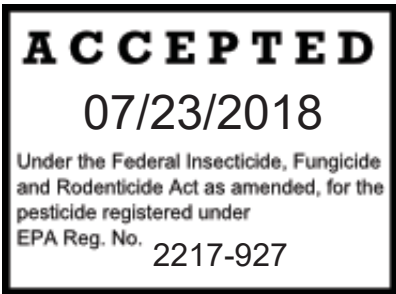
with FIFRA section 6. If you have any questions, please contact Emily Schmid at 703-347-0189 or by email at schmid.emily@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

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

Enclosure



DITHIOPYR	GROUP	3	HERBICIDE
2,4-D DICAMBA QUINCLORAC	GROUP	4	HERBICIDE

EH-1470 PROFESSIONAL

EPA Reg. No. 2217-927

ACTIVE INGREDIENTS:

2,4-D	0.675%
Dicamba	0.060%
Dithiopyr	0.121%
Quinclorac	0.346%

OTHER INGREDIENTS:	<u>98.798%</u>
TOTAL	100.000%

THIS PRODUCT CONTAINS:

- 13.50 lb 2,4-dichlorophenoxyacetic acid equivalent per ton
- 1.20 lb 3,6-dichloro-o-anisic acid equivalent per ton
- 2.42 lb dithiopyr per ton
- 6.92 lb quinclorac per ton

Isomer Specific By AOAC Methods.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

See attached booklet [inside pages] for complete Precautionary Statements and Directions for Use, including First Aid and Storage and Disposal.

OR

See back panel for complete Precautionary Statements and Directions for Use, including First Aid and Storage and Disposal.

Net Contents: _____

EPA Est. No. _____

Company Name and Address:

PBI/Gordon Corporation
 1217 West 12th Street
 Kansas City, Missouri 64101



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

Personal Protective Equipment (PPE)

All loaders, applicators, and other handlers must wear:

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

User Safety Recommendations

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

First Aid

If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or on clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 - 20 minutes.• Call a poison control center or doctor for treatment advice.

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 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.

These chemicals (2,4-D and dicamba) have properties and characteristics associated with chemicals detected in groundwater. The use of these chemicals 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 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 enter or allow people (or pets) to enter the treated area until dusts have settled.
- Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed or for research purposes.
- EH 1470 Herbicide is not sold, distributed, or registered within the state of New York. Do not use in the state of New York.

Resistance Management

For resistance management, this product contains Group 3 and Group 4 herbicides. Any weed population may contain or develop plants naturally resistant to this product and other Group 3 or 4 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same area. Appropriate resistance management strategies should be followed.

To delay herbicide resistance take one or more of the following steps:

- Rotate the use of this product or other Group 3 or 4 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use, and that considers mechanical control methods, cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive varieties) and other management practices.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide resistance-management and/or integrated weed-management recommendations for specific types of turf and weed biotypes.
- For further information or to report suspected resistance, call 877-800-5556.

Product Description

[Product name] is formulated [designed] to feed your lawn and control listed annual grasses and broadleaf weeds commonly found in home lawns. The product contains a lawn fertilizer and four different herbicides.

- [The fertilizer contains slow release nutrients that may extend the availability for turfgrass uptake.]
- The four herbicides combine to kill listed weeds at different stages of development.
- Grass weeds: Preemergent control of crabgrass, foxtails, and other annual grass weeds as listed. Postemergent control of crabgrass.
- Broadleaf weeds: Preemergent control of [chickweed, henbit, knotweed, shepherd's purse, spurge, woodsorel, and other] broadleaf weeds as listed. Postemergent control of [over] [XXX] broadleaf weeds including dandelion, chickweed, thistle and clover.

Where To Use

[Product name] may be used on the following established turf species:

Established Cool Season Turfgrass: Kentucky bluegrass, rough bluegrass (*Poa trivialis*), perennial ryegrass, fine fescues, tall fescue, seashore paspalum

Established Warm Season Turfgrass: Bermudagrass, buffalograss, zoysiagrass

[Product name] may NOT be used on: annual bluegrass (*Poa annua*), bahiagrass, bentgrass, carpetgrass, centipedegrass, dichondra, St. Augustine. Do not use this product on turfgrass where desirable clovers are present.

[Product name] may be used on warm-season and cool-season turfgrass in 4 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 only), 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.

Guidelines to follow: The use of [product name] on lawns and ornamental turfgrasses that are not well established, or have been weakened by stress due to mechanical operations, chemical injury, disease, insects, pests, excessive temperatures, or lack of moisture may increase the chances for turfgrass injury. Allow turfgrass weakened by these stresses to recover before application of this product.

WEEDS CONTROLLED			
When applied as directed, this product will control and/or suppress* the following weeds:			
Annual Grass Weeds: [10]			
Annual bluegrass (<i>Poa annua</i>) Annual ryegrass	Barnyardgrass* Crabgrass (smooth, southern, large)	Foxtail (green, yellow, giant)	Goosegrass* (crowfootgrass)
Broadleaf Weeds: [253]			
Amaranth, purple Amaranth, slender Aster, heath Aster, white heath Aster, purple Aster, white prairie Artichoke Austrian fieldcress Bedstraw, Catchweed Bedstraw, smooth	Cupid shaving Brush Cudweed Daisy, English Daisy, oxeye Dandelion, common Dandelion, false Day flower Deadnettle Dichondra Dock, broadleaf	Mustard, ball Mustard, black Mustard, blue Mustard, hedge Mustard, indian, Mustard, tansy Mustard, tumble Mustard, white Mustard, wormseed Nettle, stinging (burning)	Speedwell, common Speedwell, corn Speedwell, ivyleaf Speedwell, persian Speedwell, purslane Speedwell, slender Speedwell, snow Speedwell, thymeleaf Spiny amaranth Spurge, spotted

Bedstraw, Northern	Dock, curly	Nettle, tall	Spurge, prostrate
Bedstraw, pineywoods	Dogbane	Nettle, wood	Spurweed
Beggarticks, hairy	Dogfennel	Parsley-piert	Star of Bethlehem
Betony, Florida	Dollarweed	Parsnip	Strawberry, India mock
Bindweed, Field	(Pennywort)	Pearlwort	Tansy ragwort
Bindweed, Hedge	Dove weed	Pennycress (frenchweed)	Tanweed
Bitter Wintercress	Elderberry	Mugwort	Thistle, blessed
Bittercress, hairy	Falseflax	Pepperweed, perennial	Thistle, bull
Bitterweed	False sunflower	Pepperweed, virginia	Thistle, canada
Black-eyed Susan	Fiddleneck	(Peppergrass)	Thistle, flodman (prairie)
Black Medic	Filaree, redstem	Pigweed, prostate	Thistle, musk
Blood flower milkweed	Filaree, whitestem	Pigweed, redroot	Thistle, platte
Blue lettuce	Fleabane, daisy	Pigweed, russian	Thistle, plumeless
Brassbuttons	(annual)	Pigweed, smooth	Thistle, russian
Bristly oxtongue	Fleabane, rough	Pigweed, tumble	Thistle, scotch
Broomweed	Galinsoga, hairy	Pineapple weed	Thistle, wavyleaf
Buckhorn	Galinsoga, smallflower	Plains coreopsis (tickseed)	Thistle, yellow (horrible)
Bullnettle	Goldenrod	Plantain, blackseed	Trailing crownvetch
Burclover	Ground ivy	Plantain, bracted	Velvetleaf
Burdock	Groundsel	Plantain, broadleaf	Vervain, blue
Burweed, lawn (spurweed)	Gumweed	Plantain, buckhorn	Vervain, hoary
Buttercup, bulbous	Hairy fleabane	Plantain, hoary	Vervain, prostrate
Buttercup, creeping	Hawkweed, meadow	Plantain, narrowleaf	Vervain, tall
Buttonweed, common	Hawkweed, mouseear	Plantain, slender	Vetch, bird
(poorjoe)	Hawkweed, orange	Plantain, woolly	Vetch, hairy
Buttonweed, virginia	Hawkweed, yellow	Poison ivy	Vetch, milk
Carolina geranium (wild)	Healall	Poison oak	Vetch, narrowleaf
Carpetweed	Heartleaf drymary	Pokeweed	Vetch, wild
Catnip	Hemp	Prairie Sunflower	Virginia creeper
Catsear, spotted (false	Henbit	Prickly lettuce (compass plant)	Western clematis
dandelion)	Hoary cress	Prickly sida	Western salsify
Chamber bitter	Horsenettle	Prostrate knotweed	Wild aster
Chickweed, common	Horseweed	Puncturevine	Wild buckweat
Chickweed, mouseear	Jimsonweed	Purslane, common	Wild carrot
Chickweed, sticky	Johnny-Jumpup violet	Pusley, brazil	Wild four-o'clock
Chicory	Knawel	Pusley, florida	Wild garlic
Cinquefoil	Knotweed, prostrate	Pusley, large flower	Wild lettuce
Clover, crimson	Kochia	Ragweed, bur	Wild marigold
Clover, alyce	Lambsquarters	Ragweed, common	Wild mustard (yellow rocket)
Clover, hop	Lespedeza	Ragweed, lancleaf	Wild onion
Clover, rabbit foot	Mallow, alkali	Ragweed, western	Wild parsnip
Clover, red	Mallow, bristly	Redstem filaree	Wild radish
Clover, strawberry	Mallow, common	Rough cinquefoil	Wild rape
Clover, yellow sweet	Mallow, dwarf	Scarlet pimpernel	Wild strawberry
Clover, white sweet	Mallow, venice	Shepardspurge	Wild sweet potato
Clover, white	Marcela	Smartweed, ladysthumb	Wild violet
Cockle	Matchweed	Smartweed, pale	Woodsorrel, creeping
Cocklebur	Mexicanweed	Smartweed, pennsylvania	Woodsorrel, violet
Cocklebur, oriental	Moneywort	Smooth chaff-flower	Woodsorrel, yellow (Oxalis)
Cocklebur, spiny	Morningglory, bigroot	Smoothdock	Woolly croton
Common mullein	Morningglory, ivyleaf	Sorrel, red (sheep)	Wormseed
Corn Spurry	Morningglory, mexican	Sowthistle, annual	Yarrow, common
Creeping Beggarweed	Morningglory, red	Sowthistle, spiny	Yarrow, western
Creeping Jenny (creeping	Morningglory, tall	Spanish needles	Yarrow, yellow
charlie)	Morningglory, wolly	Speedwell, bi-lobed	

* for acceptable control of barnyardgrass and goosegrass, two applications made at a 6 to 10 week interval are needed

When To Apply

This product may be applied as a single application or as split applications in the spring, early summer, or fall.

For annual grasses such as crabgrass (smooth, southern and large) and foxtail (green, yellow, and giant): Apply in the spring and early summer. For best results, apply this product from 2 weeks before weed germination until the weed is 4 inches tall. For dense populations, make a second application no sooner than 30 days after the first application.

For broadleaf weed control: Spring applications: for [choose weeds from broadleaf weed list]. Fall applications: for [choose weeds from broadleaf weed list]. For best results, apply when broadleaf weeds are young and actively growing with adequate soil moisture and favorable temperatures (50° to 80°F).

How To Apply

- This product needs to stick to the leaves of broadleaf weeds and should be applied when the grass is wet from dew or rain.
- Poor results will occur if applied to dry lawns. When dry conditions exist, irrigate [or water] the turfgrass 24 hours before application.
- For best results, irrigate after the application. However do not irrigate [or water] sooner than 24 hours after application.
- Apply this product when the wind is calm.
- Do not spread granules onto flowers, vegetables, and ornamental shrubbery.
- Turf species listed on this label can be seeded, sodded, sprigged, or plugged into the treated areas 4 weeks after the application of this product.
- When treating newly planted areas, wait approximately 6 weeks after seedling emergence before applying this product.
- Delay mowing 2 days before and until 3 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 clippings from the treated areas as mulch or compost around flowers, ornamentals, trees, or in vegetable gardens.

How Much To Use

Use a drop or rotary spreader designed to apply granular fertilizers. Avoid skips or excessive overlaps as poor weed control or turfgrass injury may result.

[Apply 2.4 to 4.5 pounds of product per 1,000 sq.ft. per application to established turfgrass.] [Apply [2.4] [3.6] [4.5] pounds of product per 1,000 sq. ft. per application to established turfgrass.]

[For products using the 4.5 lb/1000 sq.ft. rate:] The maximum broadcast application rate is 4.5 pounds of product per 1,000 sq.ft. per application [1.32 lbs 2,4-D ae, 0.12 lb dicamba ae, 0.24 lb dithiopyr, and 0.68 lb quinclorac per acre per application]. The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum annual (seasonal) rate is 9 pounds of product per 1,000 sq.ft. [2.64 lbs 2,4-D ae, 0.24 lb dicamba ae, 0.47 lb dithiopyr, and 1.36 lb quinclorac per acre].

[For products using the 3.6 lb/1000 sq.ft. rate:] The maximum broadcast application rate is 3.6 pounds of product per 1,000 sq.ft. per application [1.06 lbs 2,4-D ae, 0.10 lb dicamba ae, 0.19 lb dithiopyr, and 0.54 lb quinclorac per acre per application]. The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum annual (seasonal) rate is 7.2 pounds of product per 1,000 sq.ft. [2.12 lbs 2,4-D ae, 0.20 lb dicamba ae, 0.38 lb dithiopyr, and 1.08 lb quinclorac per acre].

[For products using the 2.4 lb/1000 sq.ft. rate:] The maximum broadcast application rate is 2.4 pounds of product per 1,000 sq.ft. per application [0.71 lbs 2,4-D ae, 0.06 lb dicamba ae, 0.13 lb dithiopyr, and 0.6 lb quinclorac per acre per application]. The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum annual (seasonal) rate is 4.8 pounds of product per 1,000 sq.ft. [1.41 lbs 2,4-D ae, 0.13 lb dicamba ae, 0.25 lb dithiopyr, and 0.72 lb quinclorac per acre].

[Begin Optional Language

(Note to Supplemental Registrants: Equipment settings of drop spreaders, rotary spreaders, and other granular applicators may be presented on the container labels.)

SUGGESTED SPREADER SETTINGS

[Note to reader: A listing of spreaders and suggested settings for the application rate of 2.4 to 4.5 lbs. per 1,000 sq.ft. will be presented on the container labels.]

The above spreader settings are approximate. The age and condition of spreader, speed of operation and evenness of terrain may require slightly different settings for desired coverage.

CALIBRATION INSTRUCTIONS [examples]:

- For 4.5 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 220 square feet and adjust to apply at the rate of 1 pound of product per 220 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 2.4 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 420 square feet and adjust to apply at the rate of 1 pound of product per 420 square feet.

End Optional Language]

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep in original container in a cool, dry area, away from extreme heat and cold.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. To avoid wastes, use the entire contents in this bag by application according to the label instructions. 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 (bag). 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:

- Use [Apply] where [anytime] weeds are actively growing.
- Use [Apply] anytime [when] crabgrass [weed] seeds are germinating.
- Prevents [Stops] crabgrass and certain broadleaf weeds [weed seed] [from germinating] [for up to XXX months]
- Kills [Controls] existing crabgrass and prevents crabgrass seed germination
- Prevents [crabgrass] [weed seed germination] [and] kills existing weeds, [and feeds your lawn] in one step
- Controls [kills] desired weed species [from attached listing may be inserted here] and other grass and broadleaf weeds [and many other listed broadleaf weeds].
- Controls major [listed] weeds [as listed] for XX [weeks] [months]
- weed control for XX [weeks] [months]
- Eliminates lawn weeds as listed pre and post emergent control of [crabgrass] [grassy and broadleaf weeds]
- Control of grass and broadleaf weeds [as listed]!
- 3 in 1: Prevents crabgrass, kills existing grass and broadleaf weeds and fertilizes [in one step]
- Kills [Controls] over XXX grass and broadleaf weeds
- Kills the weeds present in your lawn & prevents more from growing
- Kills two types of weeds with one product
- Kills major weeds as listed
- Kills and prevents major lawn weeds as listed
- Kills and prevents dandelion, clover and crabgrass!
- Kills existing weeds & prevents new ones from growing
- Kills dandelion, crabgrass and more
- Kills [Over] [XXX] [+] Weeds [Weed Types], Even [Including] the Roots.
- Especially effective on hard-to-kill weeds
- Kills broadleaf weeds in lawns
- Kills major broadleaf weeds, even the roots. And [brand name] is formulated to kill only the weeds, not the lawn. Use as directed to kill major broadleaf weeds in your lawn.
- Kills dandelion and many other broadleaf weeds.
- Use on Lawns to Kill the Toughest Weeds like Clover and dandelion.
- Tough weed killer
- Kills [Destroys] [even] the tough[est] [hard-to-kill] broadleaf weeds [like clover, dandelion, oxalis]
- Kills [major] broadleaf weeds [like clover, dandelion, oxalis]
- Provides broadleaf control
- Controls [Kills] clover, dandelion, plantain, chickweed and [other broadleaf weeds] [others as listed]
- Clobbers clover
- Kills the root
- Kills weed roots!
- Kills tough lawn weeds
- Consistently fast on: tough weeds like clover, plantain, ground ivy and spurge [various other weeds listed]

- Kills the weeds, not the lawn
- Kills weeds, not lawn grasses
- Kills [down to] the root, [not the lawn]
- Targets weeds, leaves [grasses][the lawn] unharmed
- Controls Dandelion, White Clover, Plantain, Chickweed, Spurge and Many Other Listed Weeds
- Kills Weeds While Feeding Your Lawn
- Especially Effective on Hard-to-Kill Weeds
- Kills major broadleaf weeds including roots. And (brand name) is formulated to kill only the weeds, not the lawn. Use as directed to kill major broadleaf weeds in your lawn.
- [brand name] Turf Note – Control Those Pesky Weeds. Many broadleaf weeds [chickweed, henbit] germinate in the fall but are not visible in your lawn until spring. Applying (product name) in the fall can provide effective results. If needed, you can make a follow-up application in the spring.
- Prevents Crabgrass and Fertilizes
- Weed 'N Feed Plus Crabgrass Preventer
- One application does it all - crabgrass, dandelion, viney weeds, even clover.

Fertilizer Benefit Claims:

- Season long feeding! [up to 5 months]
- Feeds your lawn with timed-released nitrogen for extended greening
- High-Performance fertilizer contains 5% iron for deep greening.
- Contains 5% iron [for deep greening.]
- Long lasting- feeds up to 5 months.
- Greens Quickly and feeds up to 5 months
- Greens Quickly and Feeds longer.
- Time-release nitrogen feeds and enriches the soil resulting in a thick, green, strong lawn.
- Contains Composite Timed-Released (CTR)** Nitrogen for Extended Feeding.
- Greens in 72 Hours & Promotes Thick, Green Growth
- Contains Composite Timed-Release (CTR) Nitrogen for Extended Feeding!
- Encourages Quick Greening & Provides Extended Nitrogen Feeding up to 2 Months
- (Product Name) is specially formulated to complement the phosphorus already present in some soils and give your turf the additional primary nutrients needed for a good turf feeding. A soil test can help you determine if your soil has an adequate supply of phosphorus and if this is the best product for your soil type. Proper watering and mowing practices along with regular feedings will help promote a beautiful green lawn.
- Feeds up to [4] months
- Contains TCS GrowStar® 120 for 120+ days of Controlled Release Nitrogen

General Marketing Claims:

- Apply Spring and Fall
- Northern and Southern Grasses, Bluegrass, Fescue, Zoysia, Bermuda, Perennial Ryegrass
- Treats Northern and Southern Grasses
- For home lawn care
- For a beautiful lawn
- For use on lawns
- For use on: Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, zoysiagrass, hybrid bermudagrass
- Why [product name]? When it comes to your lawn, we know what matters -- lush, green grass all season long. With 5% iron and a high level of controlled release nitrogen, [product name] lawn fertilizers provide your lawn with the deepest and longest greening on the market. Sta-Green Ultra fertilizers, performance you can trust, guaranteed.
- Covers XXX sq.ft.
- DIMENSION® is a registered trademark of Dow AgroSciences, L.L.C.
- TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

Referrals to other products used sequentially:

- Project Guide – For a thicker, greener, more beautiful lawn, follow (Product Program). It’s easy to follow and can be started at anytime by simply applying the product that corresponds with the current season!
- [brand name] PROJECT GUIDE
 - 3 Simple Steps to a Lush, Green Lawn
 1. SELECT THE RIGHT FERTILIZER: [product name] are specifically formulated to provide both a quick and long lasting feeding. One application provides the lawn nutrients needed to grow thick and green. It is formulated with 5% iron for deep greening and coated nitrogen for an extended, even feeding.
 2. CONTROL UNSIGHTLY LAWN NUISANCES: [product name], such as XXX deliver the same superior greening results while controlling unsightly lawn nuisances such as weeds and insects. Vigoro Super Green combination products are not available in all areas.
 3. FERTILIZE REGULARLY: Track your fertilizer applications on a calendar and apply a [product name] fertilizer to your lawn every 4 to 6 months. Regular feeding is a key step to a healthy, thick and green lawn- all season long!

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”]

GUARANTEED ANALYSIS XX-X-X	
Total Nitrogen (N)	XX%
x.x% ammoniacal nitrogen	
x.x% urea nitrogen*	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash (K ₂ 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, P₂O₅ and K₂O may include the following: 23-3-7 or x-x-x. The fertilizer grade analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.]

- California, Oregon, Washington: “[When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials.]Information regarding the contents and levels of metals in this product is available on the internet at <http://www.aapfco.org/metals.htm>”
- 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.
- 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.] [Note to Supplemental Registrant: The bracketed part of this statement is not required for liquid products.]
- [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.
- [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."
- If the use rate applies less than 1 pound of nitrogen per 1,000 sq.ft. per application, the following statement may appear: Supplemental applications of lawn fertilizer are needed to achieve a minimum of 1 pound nitrogen per 1,000 sq.ft.

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00927.20180713.amend-proposed-clean

2. Reason for Issue: EPA Comments #1

Internal Usage Notes
Associated Container Label: Supplemental Distributors