

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 7, 2017

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

Subject: Label Amendment – Adding additional sprayer instructions etc. Product Name: EH-1472 Herbicide EPA Registration Number: 2217-928 Application Date: March 11, 2016 Decision Number: 515265

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.

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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 with FIFRA section 6. If you have any questions, please contact Shanta Adeeb by phone at 703-347-0502, or via email at <u>adeeb.shanta@epa.gov</u>.

Sincerely,

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

Enclosure

# EH-1472 HERBICIDE

# EPA Reg. No. 2217-928



Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2217-928

ACTIVE INGREDIENTS:	
Imazapyr, isopropylamine salt	0.266%
Glyphosate, isopropylamine salt	0.583%
OTHER INGREDIENTS:	<u>99.151%</u>
TOTAL	100.000%

#### THIS PRODUCT CONTAINS:

0.018 lb Imazapyr (2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3-pyridinecarboxylic acid) acid equivalent per gallon or 0.217%
 0.036 lb Glyphosate (N-(phosphonomethyl)glycine) acid equivalent per gallon or 0.433%

### **KEEP OUT OF REACH OF CHILDREN**

# CAUTION

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

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

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

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



# Sublabel 1

## For Use with Gordon's, GroundWork, and Supplemental Distributor Products

# 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.

First Aid	
If in eyes:	<ul> <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 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.

# **DIRECTIONS FOR USE**

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

### [1.] 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.] Use Information [What It Does]

[Product Name] 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. [Product name] will also provide residual control for up to 12 months in the treated area. Heavy rainfall will reduce the length of residual control.

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

[Product name] may be used to control weeds in: [In fencerows. Around domestic dwellings, outdoor buildings, structures and shelters such as dairy barns. In roadsides, paved areas (including crack and crevice), curbs, sidewalks, driveways, parking areas, brick walks, gravel paths, paths, patios, and vacant lots, urban 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. Do not use for treatment of aquatic plants. In lawns, do not use for individual weed control.

[If you **do not** desire to suppress regrowth, use a product which only contains glyphosate [such as product name] instead.]

### [4. Application Directions]

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

Use hand-operated spray equipment such as backpack sprayers, pump-up sprayers, or sprinkling can. Apply product undiluted. Weeds should be growing vigorously at the time of application for maximum herbicide activity.

**For Broadcast Treatments:** Uniformly spray the area where bareground is desired. 1 gallon of product will cover 600 sq.ft. [or equivalent rate expressed as: XXX gal/fl.oz. of product will cover YYY sq.ft.]

**For Spot Treatments:** Spray the foliage of clumps of weeds. Apply no more than 1 gallon of product per 600 sq.ft. [or equivalent rate expressed as: Apply no more than XXX gal/fl.oz. of product per YYY sq.ft. One gallon of product will treat 1200 linear feet of fence line with a 6-inch band width. [or equivalent rate expressed as: XXX linear feet of fence line with a YY-inch band width.]

#### [4.2] For Brush Control

Use hand-operated spray equipment such as backpack sprayers or pump-up sprayers. Apply product undiluted. 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.

The maximum number of applications is 1 broadcast OR 1 spot treatment per year OR 1 brush control application per year. The maximum annual rate is 1 gallons per 600 sq.ft. per year.

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

#### [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. 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

[Product name] will control or suppress most grasses, broadleaf weeds, woody brush, vines, and trees as listed. 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 the retail container label.

GRASSES [43]			
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	Panicum 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	

BROADLEAF WEEDS [75]			
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> [12]			
Field bindweed	Poison ivy	Virginia creeper	Wild rose (Including:
Hedge bindweed	Redvine	Wild buckwheat	Multiflora and Macartney
Honeysuckle	Trumpetcreeper	Wild grape	rose)
Morningglory			

WOODY BRUSH AND TREES [51]				
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	Vaccinium spp.	
Blackgum	Huckleberry	Privet	(Including: Blueberry and	
Boxelder	Lyonia spp. (Including:	Red alder	Sparkleberry)	
Brazilian peppertree	Fetterbush and	Red maple	Willow	
Ceanothis	Staggerbush)	Saltcedar	Yellow-poplar	
Cherry				

End optional weed list table.]

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in original container in a locked storage area. Keep from freezing.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

## 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 INCIDENTIAL, 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.

# Sublabel 2 For Use with Supplemental Distributor Products (Alternate Sprayer Instructions)

## 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.

First Aid		
If in eyes:	<ul> <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		

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.

# DIRECTIONS FOR USE

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

#### 1. Use 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. What It Does

[Product Name] 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. [Product name] will also provide residual control for up to 12 months in the treated area. Heavy rainfall will reduce the length of residual control.

#### 3. Where To Use

[Product name] may be used to control weeds in: [In fencerows. Around domestic dwellings, outdoor buildings, structures and shelters such as dairy barns. In roadsides, paved areas (including crack and crevice), curbs, sidewalks, driveways, parking areas, brick walks, gravel paths, paths, patios, and vacant lots, urban 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. Do not use for treatment of aquatic plants. In lawns, do not use for individual weed control.

[If you **do not** desire to suppress regrowth, use a product which only contains glyphosate [such as product name] instead.]

#### 4. How Much To Use

The maximum number of applications is 1 broadcast OR 1 spot treatment per year OR 1 brush control application per year. The maximum annual rate is 1 gallons per 600 sq.ft. per year.

**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. Apply product undiluted. Weeds should be growing vigorously at the time of application for maximum herbicide activity.

**For Broadcast Treatments:** Uniformly spray the area where bareground is desired. 1 gallon of product will cover 600 sq.ft. [or equivalent rate expressed as: XXX gal/fl.oz. of product will cover YYY sq.ft.]

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#### 4.2 For Brush Control

Use hand-operated spray equipment such as backpack sprayers or pump-up sprayers. Apply product undiluted. 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.

#### 5. How To Apply

#### [5.1 Option 1: AccuShot Sprayer]

#### [Option 1A] [Operating Instructions][AccuShot Sprayer Directions]

- 1. Remove sprayer from side holder. [Unwrap the tubing] [Gently pull tubing out]. [Graphic depiction]
- 2. Remove seal from top of cap. Unplug cap. [Graphic depiction]
- 3. Securely snap the [green] plug into hole on cap. [Graphic depiction]
- 4. Remove plastic tab near [top] [bottom] of sprayer to activate batteries. [Graphic depiction]
- 5. Twist nozzle to adjust spray from CLOSE to SPRAY or STREAM. [Graphic depiction]
- 6. [When priming the sprayer, hold sprayer level to the ground. Sprayer may not prime if it is held at an angle. Once primed, it will spray in any direction. (Graphical representation.)]

#### [Option 1B][AccuShot Sprayer Directions]

[Note to Reviewer: The AccuShot Sprayers is a reusable applicator intended to be reused with a ready-touse refill bottle of EH-1472 Herbicide. Instructions will be represented with Graphic Illustrations)

- 1. Remove cap and replace with reusable AccuShot Sprayer. Make sure sprayer cap is tightly closed before use.
- 2. Twist nozzle to adjust spray from CLOSE to SPRAY or STREAM. [Graphic depiction]

3. [When priming the sprayer, hold sprayer level to the ground. Sprayer may not prime if it is held at an angle. Once primed, it will spray in any direction. (Graphical representation.)]

How To Use The AccuShot Sprayer

- Aim toward target [site] [area to be treated], and away from people and pets.
- [To improve accuracy, use slider to extend wand.] [Use slider to extend wand and to improve accuracy.]
- Press the trigger to spray.
- Release the trigger to stop spray.

After use:

- 1. Twist nozzle completely to CLOSE position.
- 2. Secure sprayer upright [tip down] in [holster] [holder].
- 3. Failure to adjust nozzle completely to CLOSE position and properly secure sprayer in [holster] [holder] may result in leakage and damage to property.

[Keep reusable AccuShot sprayer for use with EH-1472 Herbicide]

To replace batteries:

- 1. [Slide battery compartment door to unlatch and open.] [Use screwdriver to open battery compartment [Push release button near nozzle and lift up on battery hatch.]
- Remove used batteries and insert [four] [two] new AA batteries in correct positions as marked per diagram inside of battery compartment. Never insert the positive end where the negative end belongs and vice versa. Always use a complete set of new batteries of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.
- 3. Securely close battery compartment door.
- 4. Always follow manufacturer's recommendations for use and disposal of batteries.

Additional Operating Notes:

- Do not submerge in water.
- Before each use, inspect sprayer carefully, making sure hose is flexible and not kinked, worn or cracked, and that all connections are tight.
- When storing sprayer for prolonged periods, remove batteries.

#### [Option 1C with Snap Adapt Cap] [AccuShot Sprayer Directions]

- 1. Shake well before each use
- 2. Remove sprayer from side [holster] [holder]. [Unwrap the tubing] [Gently pull tubing out]. [Graphic depiction]
- 3. Open flip top closure [Graphic depiction]
- 4. Securely snap the hose plug into opening in cap until it snaps into place. [Graphic depiction]
- 5. Slide switch on hose plug counter-clockwise to "OPEN" [Graphic depiction]
- 6. Remove plastic tab near [top] [bottom] of sprayer to activate batteries. [Graphic depiction]
- 7. Twist nozzle to adjust spray from CLOSE to SPRAY or STREAM. [Graphic depiction]
- 8. [When priming the sprayer, hold sprayer level to the ground. Squeeze and hold trigger until liquid comes out the nozzle. Sprayer may not prime if it is held at an angle. Once primed, it will spray in any direction. (Graphical representation.)]

#### [Option 1D with Snap Adapt Cap][AccuShot Sprayer Directions]

- 1. Remove cap and replace with reusuable AccuShot cap and Sprayer. Make sure sprayer cap is tightly closed before use
- 2. Twist nozzle to adjust spray from CLOSE to SPRAY or STREAM. [Graphic depiction]
- 3. Slide switch on hose plug counter-clockwise to "OPEN" [Graphic depiction]
- 4. [When priming the sprayer, hold sprayer level to the ground. Sprayer may not prime if it is held at an angle. Once primed, it will spray in any direction. (Graphical representation.)]

HOW TO USE Accushot (with Snap Adapt Cap)

- Aim toward target [site] [area to be treated], and away from people and pets.
- [To improve accuracy, use slider to extend wand.] [Use slider to extend wand and to improve accuracy.]
- Press the trigger to spray.
- Release the trigger to stop spray.

#### After use:

- 1. Twist sprayer nozzle completely to CLOSE position.
- 2. Turn hose plug switch clockwise to "CLOSED".
- 3. Secure sprayer upright [tip down] in [holster] [holder].
- 4. Failure to adjust nozzle completely to CLOSE position and properly secure sprayer in [holster] [holder] may result in leakage and damage to property.

[Keep reusable AccuShot sprayer for use with EH-1472 Herbicide]

To replace batteries:

- 1. [Slide battery compartment door to unlatch and open.] [Use screwdriver to open battery compartment [Push release button near nozzle and lift up on battery hatch.]
- Remove used batteries and insert [four] [two] new AA batteries in correct positions as marked per diagram inside of battery compartment. Never insert the positive end where the negative end belongs and vice versa. Always use a complete set of new batteries of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.
- 3. Securely close battery compartment door.
- 4. Always follow manufacturer's recommendations for use and disposal of batteries.

Additional Operating Notes:

- Do not submerge in water.
- Before each use, inspect sprayer carefully, making sure hose is flexible and not kinked, worn or cracked, and that all connections are tight.
- When storing sprayer for prolonged periods, remove batteries.

### [5.2 Option 2] [Directions For Trigger Sprayer Product]

HOW TO USE

- 1. Shake well before each use.
- 2. Adjust nozzle to narrow fan spray, to prevent excessive wetting and waste of product. Spray just enough to cover area to be treated.

#### [5.3 Option 3] [Directions For Nested Sprayer Applicator]

HOW TO USE

- 1. Shake well before each use.
- 2. Pull tab outward.
- 3. Rotate lock ring counterclockwise to unlock.
- 4. Pull sprayer to uncoil tubing.
- 5. Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10 15 times until product is dispensed. Adjust nozzle to fine spray or jet stream as needed.
- 6. To store, turn nozzle to "OFF" position and return sprayer to bottle opening.
- 7. Drape tubing through slot in the spray handle.
- 8. Turn lock ring clockwise to lock.

#### [5.4 Option 4] [Directions For Captive Sprayer Product] [Option 4A] HOW TO USE

#### **BEFORE USE:**

- 1. Shake well before each use.
- 2. Peel sticker from flip-top cap and open cap. Discard sticker.
- 3. Remove sprayer from its slot beneath the bottle handle and remove and discard plastic wrap. Pull black hose tip to completely extend tubing.
- 4. Firmly press black hose tip into opening in cap until it snaps into place.
- 5. Hold sprayer below the level of the container and prime by pumping trigger several times until product is dispensed.
- 6. Adjust nozzle to desired setting.

#### AFTER USE:

- 1. To store, turn sprayer nozzle off.
- 2. DO NOT disconnect hose.
- 3. Return sprayer to its slot. Hose can be pushed back into sprayer handle.

#### [Option 4B] [Captive Sprayer Application (with Snap Adapt Cap)] HOW TO USE

#### **BEFORE USE:**

- 1. Shake well before each use.
- 2. Open flip top closure [Graphic depiction]
- 3. Remove sprayer from its slot beneath the bottle handle and unwrap the tubing. Pull hose plug to completely extend tubing.
- 4. Firmly press hose plug into opening in cap until it snaps into place.
- 5. Slide switch on hose plug counter-clockwise to "OPEN" [Graphic depiction]
- 6. Adjust nozzle to desired setting, SPRAY or STREAM
- 7. Hold sprayer below the level of the container and prime by pumping trigger several times until product is dispensed.

#### AFTER USE:

- 1. To store, turn sprayer nozzle off.
- 2. Turn hose plug switch clockwise to "CLOSED"
- 3. DO NOT disconnect hose.
- 4. Return sprayer to its slot. Hose can be pushed back into sprayer handle.

### [5.5 Option 5: EZ Spray<sup>™</sup>]

#### [Option 5A] [Directions For EZ Spray™ Product][Operating Instructions for EZ Spray™]

- 1. Remove sprayer from side holder. [Unwrap the tubing] [Gently pull tubing out]. [Graphic depiction]
- 2. Remove seal from top of cap. Unplug cap. [Graphic depiction]
- 3. Securely snap the [green] plug into hole on cap. [Graphic depiction]
- 4. Remove plastic tab near [top] [bottom] of sprayer to activate batteries. [Graphic depiction]
- 5. Twist nozzle to adjust spray from CLOSE to SPRAY or STREAM. [Graphic depiction]
- 6. [When priming the sprayer, hold sprayer level to the ground. Sprayer may not prime if it is held at an angle. Once primed, it will spray in any direction. (Graphical representation.)]

#### How To Use The EZ SPRAY™

- Aim toward target [site] [area to be treated], and away from people and pets.
- [To improve accuracy, use slider to extend wand.] [Use slider to extend wand and to improve accuracy.]
- Press the trigger to spray.
- Release the trigger to stop spray.

After use:

- 1. Twist nozzle completely to CLOSE position.
- 2. Secure sprayer upright [tip down] in [holster] [holder].
- 3. Failure to adjust nozzle completely to CLOSE position and properly secure sprayer in [holster] [holder] may result in leakage and damage to property.

To replace batteries:

- 1. [Slide battery compartment door to unlatch and open.] [Use screwdriver to open battery compartment [Push release button near nozzle and lift up on battery hatch.]
- Remove used batteries and insert [four] [two] new AA batteries in correct positions as marked per diagram inside of battery compartment. Never insert the positive end where the negative end belongs and vice versa. Always use a complete set of new batteries of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.
- 3. Securely close battery compartment door.
- 4. Always follow manufacturer's recommendations for use and disposal of batteries.

Additional Operating Notes:

- Do not submerge in water.
- Before each use, inspect sprayer carefully, making sure hose is flexible and not kinked, worn or cracked, and that all connections are tight.
- When storing sprayer for prolonged periods, remove batteries.

#### [Option 5B] [EZSPRAY<sup>™</sup> Directions]<sup>™</sup>] (with Snap Adapt Cap)

- 1. Shake well before each use
- 2. Remove sprayer from side [holster] [holder]. [Unwrap the tubing] [Gently pull tubing out]. [Graphic depiction]
- 3. Open flip top closure [Graphic depiction]
- 4. Securely snap the hose plug into opening in cap until it snaps into place. [Graphic depiction]
- 5. Slide switch on hose plug counter-clockwise to "OPEN" [Graphic depiction]
- 6. Remove plastic tab near [top] [bottom] of sprayer to activate batteries. [Graphic depiction]
- 7. Twist nozzle to adjust spray from CLOSE to SPRAY or STREAM. [Graphic depiction]
- 8. [When priming the sprayer, hold sprayer level to the ground. Squeeze and hold trigger until liquid comes out the nozzle. Sprayer may not prime if it is held at an angle. Once primed, it will spray in any direction. (Graphical representation.)]

HOW TO USE THE EzSpray<sup>™</sup> (with Snap Adapt Cap)

- Aim toward target [site] [area to be treated], and away from people and pets.
- [To improve accuracy, use slider to extend wand.][Use slider to extend wand and to improve accuracy.]
- Press the trigger to spray.
- Release the trigger to stop spray.

#### After use:

- 1. Twist sprayer nozzle completely to CLOSE position.
- 2. Turn hose plug switch clockwise to "CLOSED".
- 3. Secure sprayer upright [tip down] in [holster] [holder].
- 4. Failure to adjust nozzle completely to CLOSE position and properly secure sprayer in [holster] [holder] may result in leakage and damage to property.

To replace batteries:

- 1. [Slide battery compartment door to unlatch and open.] [Use screwdriver to open battery compartment [Push release button near nozzle and lift up on battery hatch.]
- Remove used batteries and insert [four] [two] new AA batteries in correct positions as marked per diagram inside of battery compartment. Never insert the positive end where the negative end belongs and vice versa. Always use a complete set of new batteries of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

- 3. Securely close battery compartment door.
- 4. Always follow manufacturer's recommendations for use and disposal of batteries.

Additional Operating Notes:

- Do not submerge in water.
- Before each use, inspect sprayer carefully, making sure hose is flexible and not kinked, worn or cracked, and that all connections are tight.
- When storing sprayer for prolonged periods, remove batteries.

#### 6. 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.

- 3. **Runoff:** Do not over apply causing runoff from the treated foliage. Do not apply to slopes.
- 4. **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. Applications with wind speeds greater than 10 mph are prohibited.
- 5. **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.
- 6. **Movement of Treated Soil:** Do not treat powdery, dry or light sandy soils when the soil may be blown by wind. It may be necessary to irrigate or wait for a rain event to settle the soil prior to application.

### 7. Weeds Controlled

[Product name] will control or suppress most grasses, broadleaf weeds, woody brush, vines, and trees as listed. The degree of control and residual varies by plant species. [List of weeds controlled:]

GRASSES [43]			
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	Panicum 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	

[Optional weed list table. Some or all may be included on the retail container label.

BROADLEAF WEEDS [75]			
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	

VINES [12]				
Field bindweed	Poison ivy	Virginia creeper	Wild rose (Including:	
Hedge bindweed	Redvine	Wild buckwheat	Multiflora and Macartney	
Honeysuckle	Trumpetcreeper	Wild grape	rose)	
Morningglory		-		

WOODY BRUSH AND TREES [51]			
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	Vaccinium spp.
Blackgum	Huckleberry	Privet	(Including: Blueberry and
Boxelder	Lyonia spp. (Including:	Red alder	Sparkleberry)
Brazilian peppertree	Fetterbush and	Red maple	Willow
Ceanothis	Staggerbush)	Saltcedar	Yellow-poplar
Cherry			

End optional weed list table.]

### STORAGE AND DISPOSAL

#### [For Option 1: AccuShot Sprayer]

**PESTICIDE STORAGE:** Turn the nozzle to "CLOSE" position. To prevent leakage, attach sprayer to clip. Store this product only in its original container in a secure storage area away from sources of heat or open flame and in an area inaccessible to children and pets. Protect product from freezing.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Do not discard the AccuShot Sprayer. Keep the AccuShot Sprayer for use on EH-1448 Herbicide. Nonrefillable container. Do not reuse or refill this container. If **empty:** Place in trash or offer for recycling if available. If **partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### [For Option 2: Trigger Sprayer or Captive Sprayer]

**PESTICIDE STORAGE:** Store in cool dry area away from heat or open flame.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING: If empty:** Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling, if available. **If partly filled**: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### [For Option 3: Nested Sprayer]

**PESTICIDE STORAGE:** Turn the nozzle to "OFF" position and store with sprayer above the level of liquid in container to prevent leakage.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** If empty: Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste

agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### [For Option 4: EZSPRAY Sprayer]

**PESTICIDE STORAGE:** Turn the nozzle to "CLOSE" position. To prevent leakage, attach sprayer to clip. Store this product only in its original container in a secure storage area away from sources of heat or open flame. Protect product from freezing.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### [For Option 5: AccuShot Sprayer and EZ Sprayer with Snap Adapt Cap]

**PESTICIDE STORAGE:** Turn the nozzle to "CLOSE" position. To prevent leakage, place sprayer in holster. Store this product only in its original container in a secure storage area away from sources of heat or open flame and in an area inaccessible to children and pets. Keep from freezing.

**PESTICIDE DISPOSAL** Do not discard the AccuShot Sprayer. Keep the AccuShot Sprayer for use on EH-1472 Herbicide. Nonrefillable container. Do not reuse or refill this container unless the directions for use allow a different (concentrated) product to be diluted in the container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

### 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 INCIDENTIAL, 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.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

# APPENDIX

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

Herbicide Benefit Claims:

- · Offers long-term weed control in places where no growth is wanted
- Kills [Controls] [unwanted] [weeds], [brush], [plants], and [grasses] as listed
- Prevents vegetative growth of listed [weeds] [brush] [plants] [grasses] for up to 1 year.
- Apply only where no vegetation growth is wanted for up to 1 year.
- Kills [Controls] all listed vegetation
- Year-Long Control Of Tough Weeds & Brush
- Kills & prevents listed vegetation for up to 1 year
- Kills the root
- Offers long-term weed control
- Kills unwanted weeds, brush and grass as listed
- Year-long control
- Year-long control of tough weeds and brush as listed
- Kills all listed vegetation weeds, grasses, and brush
- Kills unwanted weeds as listed

#### General Marketing Claims:

- XX [fl.oz./gallons] of product treats up to YYYY sq.ft
- Covers XXXX sq.ft.
- For driveways, patios, fencerows, and other places where no vegetation is desired.
- Creating customer solutions since 1942
- Ready-To-Use
- Rainproof in 3 hours
- Guaranteed\* to work or your money back [\*If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.]
- Refill
- Questions or Comments? Call 1-800-322-5553
- NOTICE: To the extent required by applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

#### Applicator Claims:

- Easy to use
- · Easy to use sprayer
- Continuous action power sprayer
- Continuous power trigger
- · Press and hold technology
- [New] AccuShot [New may only be used for 6 months from initial acceptance]
- [New] AccuShot Sprayer [New may only be used for 6 months from initial acceptance]
- [Just] Aim & spray
- Comfort-Power-Precision
- With extendable wand [for improved accuracy]
- With adjustable wand [for improved accuracy]
- For use with reusable AccuShot sprayer
- Reduced hand fatigue [when spraying around entire home]
- [X] AA batteries included

# **DOCUMENT CONTROL INFORMATION**

1. Unique Label Identifier: 002217-00928.20170201.amend-proposed-clean

#### 2. Reason for Issue: EPA Comments #3

#### **Internal Usage Notes**

Sublabel 1. For Use with Gordon's, GroundWork, and Supplemental Distributor Products Associated Container Label: Pronto Fast Acting Vegetation Killer Ready-To-Use, GroundWork Fast Acting Vegetation Killer Ready-To-Use

Sublabel 2. For Use with Supplemental Distributor Products (Alternate Sprayer Instructions) Associated Container Label: Distributor Product