

2217-961

6/8/2012

1/9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D C 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

JUN - 8 2012

James L Kunstman, Ph D
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, Missouri 64101

Subject Amendment revising the Protective Eye-wear of applicators statement
Product name EH 1516 Herbicide
EPA Reg No 2217-961
Application Dated January 23, 2012

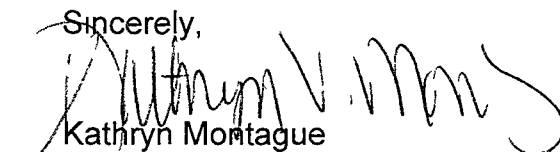
Dear Mr Kunstman

The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

If you have any questions please contact Grant Rowland at 703-347-0254 or at Rowland.Grant@epa.gov

Sincerely,


Kathryn Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

EH-1516 HERBICIDE

JUN - 8 - 2012

from the Federal Insecticide,
Fungicide and Rodenticide Act,
Title 40 of the Code of Federal Regulations
2217-961

EPA Reg. No. 2217-961

ACTIVE INGREDIENT

MCPA dimethylamine salt	38.96%
MCPP-p dimethylamine salt	8.19%
Dicamba dimethylamine salt	4.09%
OTHER INGREDIENTS	<u>48.76%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS

- 3.075 lb 2-methyl 4-chlorophenoxyacetic acid equivalent per gallon or 31.80%
- 0.655 lb (+)-(R)-2-(2-methyl 4-chlorophenoxy)propionic acid equivalent per gallon or 6.77%
- 0.329 lb 3,6-dichloro o-anisic acid equivalent per gallon or 3.40%

KEEP OUT OF REACH OF CHILDREN

DANGER

KEEP FROM FREEZING

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Avoid contact with skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are barrier laminates. If you want more options, follow the instructions for Category A on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators and other handlers must wear*

- Protective eyewear (goggles, face shield, or safety glasses)
- Long sleeved shirt and long pants
- Chemical resistant gloves
- Shoes plus socks

* Applicators may choose not to wear protective eyewear with dilution rates greater (higher) than 4:1 or greater (higher) than 4 parts of water to 1 part of product.

User Safety Requirements

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



and other absorbent materials that have been drenched or heavily contaminated with this product s concentrate Do not reuse them

User Safety Recommendations	
<ul style="list-style-type: none"> • Users should wash thoroughly with soap and water after handling and before eating drinking chewing gum using tobacco or using the toilet Remove and wash contaminated clothing before reuse • 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 	

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 the 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
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment You may also contact 1 877 800 5556 for emergency medical treatment advice</p> <p>NOTE TO PHYSICIAN Probable mucosal damage may contraindicate the use of gastric lavage</p>	

Environmental Hazards

This pesticide may be toxic to fish aquatic invertebrates and aquatic plants 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 washwater or rinsate Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours

This chemical has properties and characteristics associated with chemicals detected in groundwater The use of this chemical in areas where soils are permeable particularly where the water table is shallow may result in groundwater contamination Application around a cistern or well may result in contamination of drinking water or groundwater

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons either directly or through drift Only protected handlers may be in the area during application For any requirements specific to your State or Tribe consult the agency responsible for pesticide regulation

1 Product Description

This product is for use on Ornamental Turf Lawns (Residential Industrial and Institutional) Parks Cemeteries Athletic Fields and Golf Courses (Fairways Aprons Tees and Roughs) also for Woody Plants and Roadsides Not for use on turf being grown for sale or other commercial use as sod or for commercial seed production or for research purposes

2 Spray Drift Management

Avoiding spray drift at the application site is the responsibility of the applicator The interaction of many equipment and weather related factors determine the potential for spray drift The applicator and the grower are responsible for considering all these factors when making decisions

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles

Wind Speed

Apply only when the wind speed is 2 to 10 mph at the application site Do not apply at wind speeds greater than 10 mph

Temperature Inversions

If applying at wind speeds less than 3 mph the applicator must determine if 1) conditions of temperature inversion exist or 2) stable atmospheric conditions exist at or below nozzle height Do not make applications into areas of temperature inversions or stable atmospheric conditions

Additional requirements for ground boom application

Do not apply with a nozzle height greater than 4 feet above the crop canopy

3 Use Precautions

Avoid drift of spray mist to vegetables flowers ornamental plants shrubs trees and other desirable plants Do not pour spray solutions near desirable plants Do not use on Dichondra nor on lawns or turf where desirable clovers are present Maximum control of weeds will be obtained from spring or early fall applications when weeds are actively growing Use the higher rate for hard to control weeds Do not exceed specified dosages for any area Do not use this product on or near desirable plants including contact of spray on exposed root systems or adventitious shoots within the drip line of desirable trees and shrubs since injury may result Do not apply to newly seeded grasses until well established Avoid broadcast applications when air temperature exceeds 90 degrees When using small spot treatment applications in temperature over 90 degrees turf injury may occur

When treating Carpetgrass and St Augustinegrass avoid broadcast applications when air temperature exceeds 80 degrees When air temperatures exceed 80 degrees limit application to spot treatment only

For optimum results (1) avoid applying during excessively dry or hot periods unless irrigation is used (2) avoid applying if rainfall is expected within 24 hours nor should lawns be irrigated (watered) for 24 hours following application (3) turf should not be mowed 1 to 2 days before and following application (4) reseed no sooner than 3 to 4 weeks after application of this product Adding oil wetting agent or other surfactant to the spray may be used to increase effectiveness on weeds but doing so may reduce selectivity to turf resulting in turf damage Clean and rinse spray equipment using soap or detergent and water and rinse thoroughly before reuse for other sprays

This product can be mixed with some liquid fertilizers or liquid iron materials Because liquid fertilizers and liquid iron differ in pH free ammonia content density salt concentration and percentage of water a compatibility test (given below) is recommended prior to mixing in the application equipment All regulations either State or Federal relating to the application of liquid fertilizers or liquid iron and this

product must be strictly followed The following compatibility test should always be performed prior to full scale mixing

- 1 Pour 18 ounces of water into a quart jar
- 2 Add 1 ounce of either the liquid fertilizer or liquid iron to be used
- 3 Add 1 ounce of this product
- 4 Close jar and shake well
- 5 Watch the mixture for several seconds after shaking and check again after 30 minutes
- 6 If the mixture does not show signs of separating the combination may be used If the mixture foams excessively gels separates or gets very thick do not combine for field application
- 7 Compatibility may be improved by the use of a compatibility agent Follow the previously outlined test procedures and add 1/6 ounce of the compatibility agent between steps (the compatibility agent must be added to the fertilizer or iron before adding this product)
- 8 If the mixture does not separate gel foam or get very thick it may be used for field application Mix only the amount to be sprayed Do not allow to stand overnight

4 Weeds Controlled			
Bedstraw	Frenchweed	Peppergrass	Stinging nettle
Bindweed	Goldenrod	Pepperweed	Stitchwort
Black medic	Ground ivy	Pigweed	Thistle
Buckhorn	Hawkweed	Plantain	Toadflax
Burdock	Healall	Poison ivy	Veronica
Buttercup	Heartleaf drymary	Poison oak	Wild aster
Canada thistle	Henbit	Purslane	Wild carrot
Carpetweed	Jimsonweed	Ragweed	Wild garlic
Chickweed	Knotweed	Red clover	Wild geranium
Chicory	Kochia	Red sorrel	Wild lettuce
Clover	Lambsquarters	Sheep sorrel	Wild onion
Cocklebur	Lespedeza	Shepherdspurse	Wild radish
Dandelion	Mallow	Smartweed	Wood sorrel
Dock	Morningglory	Speedwell	Yarrow
Dog fennel	Mustard	Spurge	and many other
English daisy	Oxalis	Spurweed	broadleaf weeds
Florida pusley	Pennywort		

5 Ornamental Lawns and Turfs

Cool-Season Grasses Apply 2.5 to 3.9 pints in 20 to 240 gallons of spray solution per acre (0.9 to 1.4 fluid ounces in 0.5 to 4 gallons of water per 1,000 square feet) to control (or kill) weeds growing in ornamental lawn turf planted to Kentucky bluegrass perennial ryegrass tall fescue or fine fescue

Warm Season Grasses Apply 2 to 3 pints in 20 to 240 gallons of spray solution per acre (0.7 to 1.1 fluid ounces in 0.5 to 4 gallons of water per 1,000 square feet) to control weeds growing in Bermudagrass or zoysiagrass Applications to other grass species including bahiagrass kikuyugrass buffalograss centipedegrass carpetgrass or St. Augustinegrass should be avoided unless injury can be tolerated Avoid applications to warm season grasses emerging from winter dormancy unless a slight delay in spring green up can be tolerated

Bentgrass Turf (Other Than Golf Course Greens and Tees) On closely mowed bentgrass apply at a maximum rate of 2.5 pints per acre (0.9 fluid ounces in 3 gallons of water per 1,000 square feet) in May or mid-August through September when weeds are actively growing Exercise care when applying to avoid overdosing Bentgrass or turf injury may result Slight turf yellowing should disappear after about 1 week

Bentgrass Turf (Putting and Bowling Greens) On closely mowed bentgrass apply at a maximum rate of 1 fluid ounce in 5 gallons of water per 1,500 square feet -- preferably in May or mid-August through September Slight turf yellowing will disappear after about one week

NOTE Care should be taken to avoid overdosing bentgrass St Augustinegrass and centipedegrass or injury may result Large volumes of spray water will aid in obtaining uniform coverage If hand type sprayers are used it is preferable to use a single nozzle sprayer rather than a multiple nozzle boom as sideways application with a boom where the spray from more than one nozzle is allowed to fall on the same area will result in heavy local over-application and subsequent turf discoloration or injury

Herbi(TM) Controlled Droplet Applicator

For Cool Season Grasses -- Add 1.67 to 2.5 pints of this product to the 5 pint Herbi bottle then fill with water to make 5 pints of mixture or substitute 0.5 pint of a surfactant for water while agitating the solution per 1 acre treatment

For Listed Warm Season Grasses Apply 1.25 to 1.67 pints of this product then add water to make total of 5 pints of mixture While walking at approximately 1 pace (3 feet) per second spray entire contents over 33 000 square feet (3/4 of an acre) Do not overlap (double coverage) at edge of spray patterns Reduced rates (use 1/2 of rate shown above) of this product must be applied when grass is stressed from heat drought etc

Controlled Droplet Applicators (CDA), Atomizers, and Spinning Disk Applicators

For Cool-Season Grasses - Use this product at the rate of 2.5 to 3.5 pints per acre (0.9 to 1.25 fluid ounces per 1 000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment)

For Listed Warm Season Grasses - Use 2 to 3 pints of this product per acre (0.7 to 1.1 fluid ounces per 1 000 square feet) in sufficient water to assure coverage (1 to 4 gallons of water per acre is normal for this type of equipment)

NOTE For all grasses 1) Do not overlap spray patterns 2) Use reduced rates if grass is stressed from heat drought etc and 3) Follow CDA equipment spray instructions

Limitations on broadcast treatments to ornamental lawns and turfs

The maximum application rate is 3.9 pints of product per acre per application [1.5 lb MCPA ae 0.32 lb MCPP p ae and 0.16 lb dicamba ae 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 seasonal rate is 7.8 pints of product per acre per year [3.0 lb MCPA ae 0.64 lb MCPP p ae and 0.32 lb dicamba ae per acre per year] excluding spot treatments

Limitations on spot treatments to ornamental lawns and turfs

Spot treatment is defined as a treatment area no greater than 1 000 sq ft per acre The maximum application rate is 1.4 fl oz per 1 000 sq ft per application [0.32 lb MCPP p ae per acre] The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications

6 Non-Cropland Areas

(fencerows, hedgerows, roadsides (including aprons and guard rails), ditches, rights-of way, utility, pipelines, powerlines, railroads, airports, commercial plants, storage and lumber yards, barrier strips and firebreaks, equipment areas, nurseries and ornamental plantings, fuel tank farms, pumping stations and other industrial sites)

Broadcast Treatment to Non Cropland Areas For the control of broadleaf weeds mix 0.25 gallon to 3 pints of this product per 50 to 300 gallons of water This mixture will cover 1 acre Thoroughly saturate all weeds with spray mixture Apply any time between the time when plants come into full leaf (spring) to when the plants begin to go dormant Best results are obtained when weeds are young and actively growing Do not cut weeds until herbicide has translocated throughout the plant causing root death For small broadleaf weeds use the lower rate

Limitations on Broadcast Treatments to Non Cropland Areas

Do not apply more than 3.9 pints of this product [1.5 lb MCPA ae] per acre per application. Do not apply more than 2 applications per year. The minimum retreatment interval of 30 days. The maximum seasonal rate is 7.8 pints of product per acre per year [3.0 lb MCPA ae, 0.64 lb MCPP-p ae, and 0.32 lb dicamba ae per acre per year].

Spot Treatment to Non-Cropland Areas Apply to both stems and foliage any time from the time foliage is completely matured until the time plants start to go dormant. All leaves, stems and suckers must be completely wet to the ground line for effective control. Regrowth may be anticipated on the more resistant species. Add 3 pints of this product to 100 gallons of water applying 200 to 600 gallons of spray mixture per acre depending upon the height and thickness of the brush. Mix thoroughly before spraying.

Limitations on Spot Treatments to Non Cropland Areas

Do not apply more than 6.0 pints of product [3.0 lb MCPA p ae] per acre per year.

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

PESTICIDE STORAGE Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing. To prevent cross-contamination, do not store near herbicides, fertilizers, insecticides, fungicides or seeds.

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

[For Plastic Containers – Nonrefillable with capacities equal to 1 gallon or less than 5 gallons]
CONTAINER HANDLING Nonrefillable container. Do not reuse or refill this container. Triple rinse [or pressure] rinse container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

[OR

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

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons]
CONTAINER HANDLING Nonrefillable container. Do not reuse or refill this container. Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the

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

[OR

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

[For Refillable Containers]

CONTAINER HANDLING Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Container cleaning. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

LIMITED WARRANTY AND DISCLAIMER

IMPORTANT Read this LIMITED WARRANTY AND DISCLAIMER before buying or using this product. By opening and using this product, buyer and all users agree to accept the terms of this LIMITED WARRANTY AND DISCLAIMER in their entirety and without exception. If the terms are not acceptable, return this product unopened immediately to the point of purchase and the purchase price will be refunded in full.

It is impossible to eliminate all risks inherently associated with use of this product. Damage to the treated article, ineffectiveness, or other unintended consequences can result from use of the product under abnormal conditions such as weather, presence of other materials, or the manner of use or application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS**. Buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings, and cautions.

The manufacturer warrants only that this product conforms to the chemical description given on the label and that the product is reasonably suited for the labeled use when applied according to the Directions for Use, subject to the inherent risks described below. **THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED.**

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL THE MANUFACTURER BE LIABLE FOR

INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT The Manufacturer must be promptly notified in writing of any claims whether based in contract tort negligence strict liability or otherwise to be eligible to receive either remedy stated above

The terms of this 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 may appear on different label components depending on packaging configuration

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

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

- Controls Dandelion Chickweed Knotweed Plantain Henbit Spurge and many other broadleaf weeds some of which are shown on the side panel
- FOR SELECTIVE BROADLEAF WEED CONTROL IN ORNAMENTAL LAWNS AND TURFGRASSES ALSO FOR WOODY PLANTS ROADSIDES AND SIMILAR NON CROPLAND AREAS
- CONTROLS Dandelion Chickweed Black medic Knotweed Plantain Oxalis Clover Cocklebur Thistle and many other species of broadleaf weeds listed on this label
- CONTAINS MCPA MECOPROP p AND DICAMBA
- TRIMEC® is a registered trademark of PBI/GORDON CORPORATION

DOCUMENT CONTROL INFORMATION

1 Unique Label Identifier 002217 00961 20120123 amend proposed clean doc

2 Reason for Issue add eyewear for diluted mix