

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 23, 2019

Eric Smith Director, Regulatory Affairs PBI/Gordon Corporation P.O. Box 860350 Shawnee, KS 66286

Subject: Notification per PRN 98-10 – Add alternate warranty statement and marketing claims;

correct 2,4-D CAS number

Product Name: EH-1513 ORP EPA Registration Number: 2217-964 Application Date: July 11, 2019 Decision Number: 553550

Dear Mr. Smith:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

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 (FIFRA) 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.

If you have any questions, please contact Lydia Crawford by phone at 703-347-0622, or via email at Crawford.Lydia@epa.gov.

Sincerely, Mundy Ondoh

Mindy Ondish Product Manager 23 Herbicide Branch

Registration Division (7505P) Office of Pesticide Programs

EH-1513 ORP

NOTIFICATION

2217-964

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

09/23/2019

EPA Reg. No. 2217-964

ACTIVE INGREDIENT:	
2,4-D	0.675%
Dicamba	0.060%
Quinclorac	0.346%
OTHER INGREDIENTS:	98.919%
TOTAL	100.000%

THIS PRODUCT CONTAINS:

13.50 lb 2,4-dichlorophenoxyacetic acid equivalent per ton (CAS 1928-43-494-75-7)

1.20 lb 3,6-dichloro-o-anisic acid equivalent per ton (CAS 1918-00-9)

6.92 lb quinclorac per ton (CAS 84087-01-4)

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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

Personal Protective Equipment (PPE)

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

All loaders, applicators, and other handlers must wear:

- long-sleeved shirt and long pants,
- · shoes plus socks, and
- chemical- resistant 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 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:	 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. 	
	ct container or label with you when calling a poison control center or doctor or going 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.

1. Product Description

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

- The three herbicides combine to kill many different kinds of weeds.
- Grass weeds: Postemergent control of crabgrass, foxtails, and other annual grass weeds...
- Broadleaf weeds: Postemergent control of [over] [XXX] broadleaf weeds including dandelion, chickweed, thistle and clover. [A partial list of broadleaf weeds is presented on this label.]

2. Precautions and 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-1513 ORP is not sold, distributed, or registered within the state of New York. Do not use in the state of New York.

3. 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

Established Warm Season Turfgrass: Bermudagrass, buffalograss, seashore paspalum, zoysiagrass

[Product name] may NOT be used on: annual bluegrass (*Poa annua*), bahiagrass, bentgrass, carpetgrass, centipedegrass, dichondra, St. Augustinegrass. 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:			
Barnyardgrass*	Crabgrass (smooth, southern, large)	Foxtail (green, yellow, giant	
A partial listing of established broadleaf weeds: [see appendix for complete list or include here]			
Bedstraw	Curly dock	Mustard	Red sorrel
Beggarticks	Daisy, oxeye	Narrowleaf plantain	Redroot pigweed
Black medic	Dandelion	Oxalis	Sheep sorrel
Broadleaf plantain	Dichondra	Parsley-piert	Shepherdspurse
Buckhorn plantain	False dandelion	Pearlwort	Slender plantain
Burclover	Ground ivy	Pennycress	Smooth dock
Burdock	Healall	Pepperweed	Smooth pigweed
Carpetweed	Henbit	Pigweed	Spurge
Chickweed, common	Knotweed	Plantain	Thistle
Chickweed, mouseear	Lambsquarters	Poison ivy	Woodsorrel
Chicory	Lespedeza	Poison oak	Yarrow
Clover, hop	Mallow	Pokeweed	and other broadleaf
Clover, strawberry	Matchweed	Purslane, common	-weeds
Clover, white	Morningglory	Ragweed	
* for acceptable control of barnyardgrass two applications made at a 6 to 10 week interval are needed			

4. When To [Apply] [Use]

This product may be applied in the spring, early summer, or fall. Do not apply more than 2 applications per year [season] with at least 30 days between applications.

[Optional additional text for more specific timing for grass weeds] **CRABGRASS** (large and smooth):

• **Spring:** For the best results, apply this product from crabgrass emergence until the 6 leaf stage (2 tillers) or before the crabgrass is 3 to 4 inches in height. Generally, this period begins or corresponds to the first time that you can see crabgrass in your lawn.

FOXTAIL (GREEN, GIANT AND YELLOW):

• **Spring and early summer:** For the best results, apply this product to foxtail during the early growth stages or when foxtail is 1 to 4 inches in height.

BROADLEAF WEEDS:

- Spring: Apply when dandelion, plantain, buttercup, speedwell, knotweed and other broadleaf weeds are young and actively growing with adequate soil moisture and favorable temperatures (50°to 80°F) for best results.
- Fall: Apply when henbit, chickweed, white clover, ground ivy, lawn burweed and other broadleaf weeds are young and actively growing with adequate soil moisture and favorable temperatures (50°to 80°F) for best results.

[End optional text]

5. 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.

6. 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, 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, 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, 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, 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, and 0.36 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, and 0.72 lb quinclorac per acre].

7. [Spreader Settings] [Coverage] [Distribution]

[Note to Supplemental Registrants: Choose one or more of these application or distribution patterns]

Use the rate listed on this bag. This XX pound bag should be used on XXXX square feet of lawn. A uniform broadcast distribution of product on the treated area is essential. The listed 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. Never apply by hand.

[Optional: An extended spreader setting listing can be found at [xxx.com]]

Spreader Settings		
Spreader	Setting	
Spreader 1	XXX	
Spreader 2	XXX	

SPREADERS AND CALIBRATION [or SPREADER CALIBRATIONS AND PATTERNS]: Drop spreaders and rotary spreaders should be calibrated for uniform application of this product.

- 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.

SPREADERS AND CALIBRATION:

Drop spreaders and rotary spreaders should be calibrated for uniform application of this product. Choose one of these application or distribution patterns:

- Single Pass Operate the equipment at intervals corresponding to the width or swath of the spreader. For drop spreaders, overlap the wheel tracks to ensure complete coverage. Close the spreader openings when turning to change directions or when stopping.
 [OR Single Pass - Always apply EH1352 Weed & Feed with a properly calibrated rotary or drop
 - type fertilizer spreader. NEVER APPLY BY HAND. To avoid gaps or streaks, first spread border of lawn. Fill in center with uniform, parallel passes. Spreader settings are approximate. Be sure to check spreader before beginning, adjusting if necessary.] To avoid gaps and streaks, first spread border of lawn and then fill in center with uniform, parallel passes. Walk at a steady pace so as to apply evenly throughout the lawn.]
- 2. **Double Pass -** Reduce the application rate by one-half of the recommended rate, calibrate the spreader, and adjust the settings for the desired application rate. Operate the spreader over the lawn two (2) times. Close the spreader openings when turning to change directions or when stopping.
- 3. Cross Hatching Reduce the application rate by one-half of the recommended rate, calibrate the spreader, and adjust the settings for the desired application rate. Operate the spreader over the lawn two (2) times. For the second trip, operate the spreader perpendicular to the wheel tracks or the spreader pattern of the first trip. Close the spreader opening when turning to change directions or when stopping.

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 DISPOSAL: 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 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 AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

[Condition of Sale and Limitation of Warranty and Liability [alternate warranty for 10404]

Notice: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully and completely. It is impossible to eliminate all risks inherently associated with the use of this product. To the extent consistent with applicable law, Buyer and/or User assume all risks of ineffectiveness or other unintended consequences or damages that may result from conditions outside or beyond the control of [company name] including but not limited to, such factors as manner of use or application, weather or weather conditions outside the range considered normal at the application site or for the time period in which the product is applied, the presence of other materials, incompatible products, or other influencing factors which are beyond the control of [company name]. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and/or User, and Buyer and/or User agrees to held [company name[harmless for any claims relating to such factors. [Company name] warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with the Directions for Use under normal use conditions. To the extent consistent with applicable law, this warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of [company name], and Buyer and/or User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, [COMPANY NAME] MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOW ANY OTHER EXPRESS OR IMPLIED WARRANTLY EXCEPT AS STATED ABOVE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE BUYER AND/OR USER AND THE EXCLUSIVE LIABILITY OF [COMPANY NAME] FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES [INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT, OR AT THE ELECTION OF [COMPANY NAME] REPLACEMENT OF THE PRODUCT, OR

IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL [COMPANY NAME] BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

[Company Name] offers this product, and Buyer and/or User accepts it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of [company name].]

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 Weight ____EPA Est. No.
- 2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:
 - Use [Apply] where [anytime] weeds are actively growing.
 - Kills [Controls] existing crabgrass
 - Kills existing weeds, [and feeds your lawn] in one step
 - Apply Spring and Fall
 - Controls [kills] desired weed species [from attached listing may be inserted here] and other grass and broadleaf weeds [and many other listed broadleaf weeds].
 - Control of grass and broadleaf weeds [as listed]!
 - 2 in 1: 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
 - Kills two types of weeds with one product
 - Kills all major weeds [as listed]
 - Kills major lawn weeds
 - Kills dandelion, clover and crabgrass!
 - · Kills existing weeds
 - Kills dandelion, crabgrass and more
 - Northern and Southern Grasses, Bluegrass, Fescue, Zoysia, Bermuda, Perennial Ryegrass
 - Treats Northern and Southern Grasses
 - 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.
 - 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]
- For home lawn care
- 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
- Kills major broadleaf weeds including roots.
- Use as directed to kill major broadleaf weeds in your lawn.
- For use on: Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, zoysiagrass, hybrid bermudagrass
- Kills Crabgrass and Fertilizes
- Covers [X,XXX] [XX,XXX] square feet [sq ft] [sq. ft.].
- Contains LESCO® Poly Plus® Polymer Coated Urea to provide a uniform growth with extended nitrogen feeding
- Information concerning the raw materials composing this product can be obtained by writing to: [company address], referring to the item number found on this bag.
- Poly Plus is comprised of Polymer Coated Urea
- Feed for 3 months guaranteed!
- Starts working on contact
- · Quick greening and extended feeding
- Phosphorus-Free
- Kills over 250 weeds as listed
- Controls a wide spectrum of broadleaf weeds
- Controls crabgrass
- Kills weeds down to the roots
- Kills dandelions and feeds grass
- Builds strong, deep roots
- Kills dandelions and other major lawn weeds
- Kills the weeds not the lawn
- Lawn fertilizer plus weed control
- Promotes root growth for a thicker, greener lawn
- Controls crabgrass escapes
- Contains LESCO® Poly Plus® OPTITM Polymer Coated Urea to provide a uniform growth with extended nitrogen feeding.
- Contains LESCO® NOS™ (Nitrogen Optimizing System) for increased nitrogen use efficiency and extended greening.
- Contains LESCO® NOS™ Plus (Nitrogen Optimizing System) for increased nitrogen use efficiency and extended greening.
- Contains LESCO® SulfRX™ Polymer Coated Sulfur Coated Urea to provide a uniform growth with extended nitrogen feeding.

3. Trademark acknowledgement statements:

• TRIMEC® is a registered trademark of PBI/GORDON CORPORATION.

4. Fertilizer Labeling Requirements in States:

GUARANTEED FERTILIZER ANALYSIS	
Total Nitrogen (N)	x.x%
x.x% Water Insoluble Nitrogen	
x.x% Urea Nitrogen x.x% Other Water Soluble Nitrogen	
Available Phosphate (P2O5)	x.x%

Soluble Potash (K2O)	x.x%
Iron (Fe)	x.x%

Nutrient Sources: [Guaranteed analysis and nutrient sources to be supplied based on fertilizer analysis used by manufacturer.]

- Information regarding the contents and levels of metals in this product is available on the internet at: http://www.aapfco.org/metals.htm.
- Typically a lawn 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 ____ pounds of nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer program suitable to your geographical region.
- If the use rate applies less than 1 pound 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.
- Advisory for Fertilizers Containing Iron: Keep this product off sidewalks, patios, driveways, etc. This
 fertilizer may stain concrete and painted surfaces. If it comes in contact with concrete surfaces,
 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.

Broadleaf Weeds: [Controls][Kills][253][more than ###] weeds! (List of weeds may include the following):			
Amaranth, purple	Creeping Jenny	Morningglory, red	Sowthistle, spiny
Amaranth, slender	(creeping	Morningglory, tall	Spanish needles
Aster, heath	charlie)	Morningglory, wolly	Speedwell, bi-lobed
Aster, white heath	Cupid shaving Brush	Mustard, ball	Speedwell, common
Aster, purple	Cudweed	Mustard, black	Speedwell, corn
Aster, white prairie	Daisy, English	Mustard, blue	Speedwell, ivyleaf
Artichoke	Daisy, oxeye	Mustard, hedge	Speedwell, persian
Austrian fieldcress	Dandelion, common	Mustard, indian,	Speedwell, purslane
Bedstraw, Catchweed	Dandelion, false	Mustard, tansy	Speedwell, slender
Bedstraw, smooth	Day flower	Mustard, tumble	Speedwell, snow
Bedstraw, Northern	Deadnettle	Mustard, white	Speedwell, thymeleaf
Bedstraw, pineywoods	Dichondra	Mustard, wormseed	Spiny amaranth
Beggarticks, hairy	Dock, broadleaf	Nettle, stinging (burning)	Spurge, spotted
Betony, Florida	Dock, curly	Nettle, tall	Spurge, prostrate
Bindweed, Field	Dogbane	Nettle, wood	Spurweed
Bindweed, Hedge	Dogfennel	Parsley-piert	Star of Bethlehem
Bitter Wintercress	Dollarweed	Parsnip	Strawberry, India mock
Bittercress, hairy	(Pennywort)	Pearlwort	Tansy ragwort
Bitterweed	Dove weed	Pennycress (frenchweed)	Tanweed
Black-eyed Susan	Elderberry	Mugwort	Thistle, blessed
Black Medic	Falseflax	Pepperweed, perennial	Thistle, bull
Blood flower milkweed	False sunflower	Pepperweed, virginia	Thistle, canada
Blue lettuce	Fiddleneck	(Peppergrass)	Thistle, flodman (prairie)
Brassbuttons	Filaree, redstem	Pigweed, prostate	Thistle, musk
Bristly oxtongue	Filaree, whitestem	Pigweed, redroot	Thistle, platte
Broomweed	Fleabane, daisy	Pigweed, russian	Thistle, plumeless
Buckhorn	(annual)	Pigweed, smooth	Thistle, russian
Bullnettle	Fleabane, rough	Pigweed, tumble	Thistle, scotch
Burclover	Galinsoga, hairy	Pineapple weed	Thistle, wavyleaf
Burdock	Galinsoga, smallflower	Plains coreopsis (tickseed)	Thistle, yellow (horrible)
Burweed, lawn (spurweed)	Goldenrod	Plantain, blackseed	Trailing crownvetch
Buttercup, bulbous	Ground ivy	Plantain, bracted	Velvetleaf
Buttercup, creeping	Groundsel	Plantain, broadleaf	Vervain, blue
Buttonweed, common	Gumweed	Plantain, buckhorn	Vervain, hoary
(poorjoe)	Hairy fleabane	Plantain, hoary	Vervain, prostrate
Buttonweed, virginia	Hawkweed, meadow	Plantain, narrowleaf	Vervain, tall
Carolina geranium (wild)	Hawkweed, mouseear	Plantain, slender	Vetch, bird

Broadleaf Weeds: [Controls][Kills][253][more than ###] weeds! (List of weeds may include the following): Carpetweed Hawkweed, orange Vetch, hairy Plantain, woolly Catnip Hawkweed, yellow Poison ivy Vetch, milk Vetch, narrowleaf Catsear, spotted (false Healall Poison oak dandelion) Heartleaf drymary Pokeweed Vetch, wild Chamber bitter Prairie Sunflower Virginia creeper Hemp Chickweed, common Henbit Prickly lettuce (compass plant) Western clematis Chickweed, mouseear Hoary cress Prickly sida Western salsify Chickweed, sticky Horsenettle Prostrate knotweed Wild aster Horseweed Wild buckweat Chicory Puncturevine Cinquefoil Jimsonweed Purslane, common Wild carrot Clover, crimson Johnny-Jumpup violet Pusley, brazil Wild four-o-clock Clover, alyce Pusley, florida Wild lettuce Knawel Clover, hop Pusley, large flower Knotweed, prostrate Wild marigold Clover, rabbit foot Kochia Ragweed, bur Wild mustard (yellow rocket) Clover, red Lambsquarters Ragweed, common Wild parsnip Clover, strawberry Lespedeza Ragweed, lancleaf Wild radish Wild rape Clover, yellow sweet Mallow, alkali Ragweed, western Clover, white sweet Mallow, bristly Redstem filaree Wild strawberry Clover, white Mallow, common Rough cinquefoil Wild sweet potato Scarlet pimpernel Cockle Mallow, dwarf Woodsorrel, creeping Cocklebur Mallow, venice Shepardspurse Woodsorrel, violet Cocklebur, oriental Smartweed, ladysthumb Woodsorrel, yellow (Oxalis) Marcela Cocklebur, spiny Matchweed Smartweed, pale Woolly croton Common mullein Mexicanweed Smartweed, pennsylvania Wormseed Smooth chaff-flower Corn Spurry Moneywort Yarrow, common Smoothdock Creeping Beggarweed Morningglory, bigroot Yarrow, western Morningglory, ivyleaf Sorrel, red (sheep) Yarrow, yellow Morningglory, mexican Sowthistle, annual

DOCUMENT CONTROL INFORMATION

- 1. Unique Label Identifier: 002217-00964.20190711.amend-proposed-highlighted
- 2. Reason for Issue: ad claims, alternate warranty statement, correct typographical errors