



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

January 24, 2024

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

Subject: Label Amendment - Registration Review Mitigation for Sulfentrazone, MCPP-p, & MCPA
Product Name: EH 1509 HERBICIDE
EPA Registration Number: 2217-971
Application Dates: May 10, 2019; January 8, 2021; & January 8, 2021
Decision Numbers: 569449, 594880, & 594881

Dear Eric D. Smith:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Sulfentrazone, MCPP-p, and MCPA Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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 Assurance.

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 12 months from the date of this letter. After 12 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.

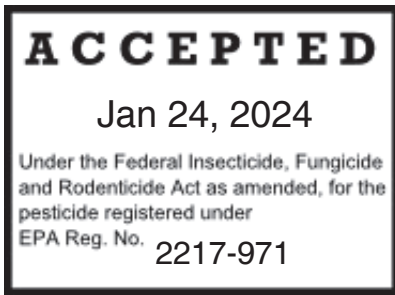
If you have any questions about this letter, please contact Caleb Carr by phone at (202) 566-0636, or via email at carr.caleb@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label



DICAMBA MCPA MCPP-P	GROUP	4	HERBICIDE
SULFENTRAZONE	GROUP	14	HERBICIDE

EH-1509 HERBICIDE

EPA Reg. No. 2217-971

Use this product only in accordance with its labeling, and with the Worker Protection Standard (WPS), 40 CFR part 170

ACTIVE INGREDIENTS:

MCPA, 2-ethylhexyl ester	66.32%
MCPP-p acid	9.92%
Dicamba acid	4.99%
Sulfentrazone	1.91%
OTHER INGREDIENTS	16.86%
TOTAL	100.00%

THIS PRODUCT CONTAINS:


- 4.05 lb 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 42.53%
- 0.94 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per gallon or 9.92%
- 0.47 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 4.99%
- 0.182 lb N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]methanesulfonamide per gallon or 1.91%

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find some one to explain it to you in detail.)

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

See next panel for additional Precautionary Statements and First Aid	
Net Contents: _____	
EPA Est. No. _____	
Company Name and Address: PBI/Gordon Corporation P.O. Box 860350 Shawnee, Kansas 66286	 Employee-Owned

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.

Personal Protective Equipment (PPE)

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

- protective eyewear (goggles, face shield, or safety goggles),
- long-sleeved shirt and long pants,
- shoes and socks,
- chemical-resistant gloves made of barrier laminate, butyl rubber, nitrile rubber, or viton when mixing, loading or using any hand-held equipment

See engineering controls for additional requirements.

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 material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Engineering Control Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

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

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.

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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards

This pesticide may be toxic to fish, aquatic invertebrates, aquatic plants, and may adversely affect non-target plants. 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 plants, and to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

Groundwater Advisory: This product has properties and characteristics associated with chemicals detected in groundwater. This product is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow. Application around a cistern or well may result in contamination of drinking water or groundwater.

Surface Water Advisory: This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having a high potential for reaching surface water via runoff for several months or more after application.

A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading this product from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours.

Non-target Organism Advisory Statement: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by minimizing spray drift.

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.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

DO NOT enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- coveralls worn over short-sleeved shirt and short pants,
- chemical-resistant footwear plus socks,
- chemical-resistant gloves made of barrier laminate, butyl rubber, nitrile rubber, or viton,
- protective eyewear.

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter or allow people (or pets) to enter the treated area until sprays have dried.

PRODUCT DESCRIPTION:

EH-1509 Herbicide contains four active ingredients including sulfentrazone that broaden the spectrum of weed control. These combined herbicides provide limited residual activity at recommended use rates. Sulfentrazone is in the aryl triazolinone family and inhibits protoporphyrinogen oxidase (Protox), a pivotal enzyme in chlorophyll production. Without this key enzyme, a build-up of peroxide-like compounds occurs, thus causing the plant cell membranes of weeds to rupture.

EH-1509 Herbicide offers these advantages:

- Excellent postemergent activity with proven performance for broadleaf weed control in turfgrass.
- This product exhibits improved cool-weather performance compared to standard “3-way amines”.
- High selectivity (turfgrass safety) in established cool-season turfgrass and warm-season turfgrass.
- Sulfentrazone combinations provide rapid and effective weed control for common and troublesome (tough) weed species in turfgrass, including: dandelion, spurge, white clover and dollarweed (pennywort).
- The speed of action and the early weed injury symptoms are features of sulfentrazone combinations compared to standard “3-way amines”. Often, the weed injury symptoms can be noticed within hours of the application and plant death can occur within 10 to 14 days.
- This product is generally rainfast in as little as 3 hours.

USE RESTRICTIONS:

- The maximum single application rate for EH-1509 Herbicide to ornamental turfgrass and sod farms is 1.5 pints of product per acre per application, the equivalent of, 0.76 lb MCPA ae, 0.18 lb MCPP-p ae, 0.09 lb dicamba ae, and 0.034 lb sulfentrazone per acre per application.
- The maximum annual application rate for EH-1509 Herbicide to ornamental turfgrass and sod farms is 3 pints of product per acre per year, the equivalent of, 1.52 lb MCPA ae, 0.35 lb MCPP-p ae, 0.18 lb dicamba ae, and 0.068 lb sulfentrazone per acre per year.
- The maximum single application rate for EH-1509 Herbicide to non-cropland roadsides and rights-of-way is 1.75 pints of product per acre per application, the equivalent of, 0.88 lb MCPA ae, 0.21 lb MCPP-p ae, 0.10 lb dicamba ae, and 0.04 lb sulfentrazone per acre per application.
- The maximum annual application rate for EH-1509 Herbicide to non-cropland roadsides and rights-of-way is 3.5 pints of product per acre per year, the equivalent of, 1.78 lb MCPA ae, 0.41 lb MCPP-p ae, 0.20 lb dicamba ae, and 0.08 lb sulfentrazone per acre per year.
- The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications.
- Do not apply this product to creeping bentgrass, greens or tees, St. Augustinegrass, carpetgrass, centipedegrass, dichondra, legumes, and lawns where desirable clovers are present.
- Do not broadcast apply this product when temperatures are above 85°F; some injury may be expected with spot treatments when air temperatures exceed 85°F.
- To avoid turf injury, use only on turfgrass that is reasonably free of stress from diseases, insects, excess heat or cold, drought or excess rainfall/irrigation, shaded areas, low soil pH, nematodes, improper mowing or improper applications of fertilizer and pesticides. Injury can occur if this product is applied under any of these or other stress conditions. Under any of these stress conditions, any turf damage caused by the use of this product is beyond the control of PBI/Gordon Corporation and all risk is assumed by the buyer and/or user.
- Do not use this product on or near desirable plants, including within the drip line of the roots of desirable trees and shrubs, since injury may result.

- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (noncropland sites adjacent to the edges of a body of water) for lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays).
- Do not apply to wetlands (swamps, bogs, potholes, or marshes).
- Do not apply to agricultural irrigation water or on agricultural irrigation ditchbanks and canals.
- Do not apply to agricultural drainage water or on agricultural ditchbanks.
- Aerial application is prohibited.
- Do not apply to rights-of-way using a backpack sprayer.

WEED RESISTANCE MANAGEMENT

For resistance management, this product contains Group 4 and Group 14 herbicides. Any weed population may contain or develop plants naturally resistant to this product and other Group 4 or Group 14 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same area. Appropriate resistance management strategies should be followed.

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

- Rotate the use of this product or other Group 4 or Group 14 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use, and that considers mechanical control methods, cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive varieties) and other management practices.
- Scout area prior to application to identify the weed species present and their growth stage to determine if the intended application will be effective.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide resistance-management and/or integrated weed-management recommendations for specific types of turf and weed biotypes.
- For further information or to report suspected resistance, call 877-800-5556.

SPRAY PREPARATION AND TANK MIXTURES:

Water as diluent:

Add one-half the required amount of water to the spray tank, then add EH-1509 Herbicide slowly with agitation, and complete filling the tank with water. Mix thoroughly and continue agitation while spraying.

When this product is left standing for extended periods of time, re-agitate to assure uniformity of the spray mixture.

Do not use tank additives that alter the pH of the spray solution below pH 5 or above pH 8. Buffer the spray solution to alter the pH range as appropriate.

Liquid fertilizers as diluents:

In certain applications, liquid fertilizer may replace part of the water as a diluent. Liquid fertilizers used as diluents can cause yellowing and /or burning of the turfgrass (phytotoxicity).

PREMIX: Always premix EH-1509 Herbicide with water before adding to fluid fertilizers. For liquid nitrogen solutions such as U.A.N. or urea solutions, use a premix of 1 part of this product with 4 parts of water or use a premix with a 1:4 ratio of product to water

Use suitable sources and rates of fertilizer based upon local recommendations. Refer to the mixing directions on the labels of the liquid fertilizers.

JAR TEST: Always perform a jar test for compatibility before large scale mixing. The jar test can be conducted by mixing all components in a small container in proportionate quantities. If the mixture separates after standing and can be mixed readily by shaking, then the mixture can be used and applied with spray equipment providing continuous agitation. If large flakes, sludge, gels or other precipitates form, or if a separate oily layer or oil globules appear, then the herbicide and the liquid fertilizer should not be prepared as a tank mixture.

Adjuvants and spray additives:

Adjuvants (such as surfactants, spreaders, spreader-stickers, spray thickeners, foaming agents, activators, detergents, and drift reducing agents) combined with this product can damage the leaf tissue of turfgrass. If any discoloration or cosmetic effects are objectionable or would be unacceptable, then adjuvant(s) combined with EH-1509 Herbicide would not be recommended. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

TANK MIXTURES

This product may be applied as a tank mixture if the companion product is EPA-registered for the same application schedule (timing) and the same application method. Read and follow the labeling of each companion product used for Precautionary Statements, Directions for Use and state restrictions. Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures. No label dosage should be exceeded. This product cannot be tank-mixed with any product containing a prohibition for tank mixtures.

JAR TEST: Always perform a jar test for compatibility of the products used in tank mixtures before large scale mixing.

GROUND EQUIPMENT:

Spray distribution: The accuracy and uniformity of the herbicide distribution is the sole responsibility of the applicator. Power sprayers fitted with a boom or spray wand/gun may be used for broadcast applications and spot treatments. Boom sprayers equipped with appropriate flat fan nozzles, tips, and screens are suitable for broadcast applications.

For best spray distribution and coverage, select a spray volume and delivery system that will ensure accurate and uniform coverage. Avoid overlaps of spray patterns that result in higher application rates and that may cause turf injury.

Spray volumes of 20 to 220 gallons per acre with spray pressures adjusted to between 20 to 40 psi. Use higher spray volumes for dense weed populations (up to 220 gallons per acre or 5 gallons per 1,000 square feet).

- Calibration and proper application are essential when using this product.
- Over-application or rates above those specified on this label can cause turf injury.
- Hand-held technique: Wands fitted with flat fan nozzle tips may be used with the appropriate technique. Flat fan nozzles should not be waved in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead, the nozzle should be held stationary at the proper height. Side-to-side motion results in uneven coverage.

Hand-operated sprayers including backpack sprayers, compression sprayers, and knapsack sprayers are appropriate for small turfgrass areas when power equipment is unavailable, uneconomical, or impractical.

This product may cause injury to susceptible/non-target plants at the use site by contacting the foliage, stems, or roots. To prevent injury to susceptible crops and other desirable broadleaf plants including but not limited to cotton, legumes, tobacco, tomatoes, grapes, garden/vegetable crops, and ornamentals (flowers, trees, and shrubs) avoid contact with the spray solution, spray droplets, and spray mist (fine droplets). Do not apply when conditions are conducive to spray drift from the use site to untreated areas, desirable broadleaf plants or susceptible crops (food, feed or forage).

After using this product, clean sprayer with soap or detergent and water, or an approved spray tank cleaner and rinse thoroughly before applying other pesticides.

Mandatory Spray Drift Management

Ground Boom Applications

- User must only apply with the release height recommended by the manufacturer, but no more than 30 inches above the ground or crop canopy.
- Applicators are required to select nozzle and pressure that deliver a medium or coarser droplet size (ASABE* S572).
- Applicators may spray only when wind speed is between 3 and 10 mph at the application site.
- Do not apply during temperature inversions.
- Ground applicators must use a minimum finished spray volume of 10 gallons per acre. When sulfentrazone is tank mixed with a contact burndown herbicide, ground applicators must use a minimum spray volume of 15 gallons per acre.

Boomless Ground Applications

- Applicators are required to select nozzle and pressure that deliver a medium or coarser droplet size (ASABE S572) for all applications.
- Applicators may spray only when wind speed is between 3 and 10 mph at the application site.
- Do not apply during temperature inversions
- Ground applicators must use a minimum finished spray volume of 10 gallons per acre. When sulfentrazone is tank mixed with a contact burndown herbicide, ground applicators must use a minimum spray volume of 15 gallons per acre.

*ASABE – American Society for Agricultural and Biological Engineers.

Spray Drift Advisories

THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT. BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL CONDITIONS.

Importance of Droplet Size

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Controlling Droplet Size - Ground Boom

Volume: Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed, consider using a nozzle with a higher flow rate.

Pressure: Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.

Spray Nozzle: Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

Boom Height - Ground Boom

For ground equipment, the boom should remain level with the crop and have minimal bounce.

Shielded Sprayers: Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

Temperature and Humidity: When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

Temperature Inversions: Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

Wind: Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS. Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

Boomless Ground Applications: Setting nozzles at the lowest effective height will help to reduce the potential for spray drift.

Handheld Technology Applications: Take precautions to minimize spray drift

WHERE TO USE:

This product provides selective broadleaf control in warm-season and cool-season turfgrass in four (4) use sites.

- **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, aprons, and roughs) , and office buildings.
- **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.
- **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.
- **Agricultural site:** Commercial sod production

Turfgrass tolerance:

- The turfgrass tolerance to this product may vary and temporary turfgrass yellowing may occur on certain varieties of hybrid bermudagrass. Adverse environmental conditions may reduce the selectivity on the turfgrass. Do not apply this product to stressed turf.
- Certain spray tank additives (adjuvants, wetting agents, surfactants), liquid fertilizers, and tank mixtures containing emulsifiable concentrates may reduce the selectivity on the turfgrass. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

APPLICATION SCHEDULES:

Apply this product to broadleaf weeds that are young and actively growing for the best results. Spring and fall treatments under adequate soil moisture conditions are preferred to the summer treatments. Generally, summer broadcast applications to older, drought stressed weeds are less effective. Fall applications provide improved control for emerged winter annuals and perennials such as henbit, chickweed, clover and ground ivy.

Sequential broadcast applications or follow-up applications as spot treatments at a 30 day interval are recommended for more mature weeds, for dense infestations, and for adverse environmental conditions.

Spot treatments during the summer may be appropriate for sparse infestations, or as a follow-up treatment, or any time broadleaf weeds are actively growing.

Extremes in environmental conditions e.g. temperature and moisture, soil conditions, and cultural practices may affect the activity of this product. Under warm moist conditions, herbicide symptoms may be accelerated. While under very dry conditions, the expression of herbicide symptoms is delayed, and weeds hardened off by drought are less susceptible to this product.

For newly seeded areas:

Delay application of this product to grass seedlings until after the second mowing.

For newly sodded, sprigged, or plugged areas:

The application of this product to newly sodded, sprigged, or plugged grasses should be delayed until 3 to 4 weeks after the sodding, sprigging, or plugging operations.

Reseeding interval:

Treated areas may be reseeded 3 weeks after application.

HOW MUCH TO USE:

USE RATES AND SPRAY VOLUMES:

Generally, the lower application rates within the specified range will provide satisfactory control of sensitive weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds hardened off or more mature.

TABLE 1. USE RATES FOR SOD FARMS, ORNAMENTAL LAWNS AND TURFGRASS.		
	Rate	Recommended Spray Volume
Cool-season turf		
Kentucky bluegrass, annual bluegrass, annual ryegrass, perennial ryegrass, tall fescue, red or fine leaf fescues	1.25 to 1.5 Pints/Acre	20 to 220 Gallons/Acre
Mixtures of cool-season species in non-cropland areas established for roadside vegetation management or for low maintenance. (Kentucky bluegrass, tall fescue, smooth brome grass & orchardgrass)	(0.45 to 0.55 fl.oz./1,000 sq.ft.)	(0.5 to 5.0 Gallons/1,000 sq.ft.)
Warm-season turf		
Hybrid bermudagrass, common bermudagrass, zoysiagrass, bahiagrass and buffalograss	1.0 to 1.25 Pints/Acre	20 to 220 Gallons/Acre
	(0.35 to 0.45 fl.oz./1,000 sq.ft.)	(0.5 to 5.0 Gallons/1,000 sq.ft.)
Do not apply this product to warm-season turfgrass during spring green-up or in the fall during the transition period between active growth and dormancy.		
Dormant turf: This product may be applied to fully dormant bermudagrass, fully dormant zoysiagrass, and fully dormant bahiagrass.		

SPOT TREATMENT:

WITH HAND OPERATED SPRAYERS (INCLUDING BACKPACK SPRAYERS, COMPRESSION SPRAYERS, AND KNAPSACK SPRAYERS):

- Apply any time the emerged broadleaf weeds are actively growing.
- Calibration and proper application are essential when using this product.
- Uniform applications are essential when using this product. Over-application or rates above those specified on this label including excessive overlaps of this product can cause turf injury.
- Hand-held techniques: Wands fitted with flat fan nozzle tips may be used with the appropriate technique. Flat fan nozzles should not be waved in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead, the nozzle should be held stationary at the proper height. Side-to-side motions result in uneven coverage.
- Follow-up applications as spot treatments at a 30 day interval are recommended for more mature weeds, for dense infestations, and for adverse environmental conditions.
- **For cool-season turfgrass:** Mix 0.45 to 0.55 fl.oz. of this product per one (1.0) gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. Do not apply this product to creeping bentgrass, greens or tees, St. Augustinegrass, carpetgrass, centipedegrass, dichondra, legumes, and lawns where desirable clovers are present. Apply any time the emerged broadleaf weeds are susceptible.
- **For warm-season turfgrass:** Mix 0.35 to 0.45 fl.oz. of this product per one (1.0) gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. Or, mix 3 to 3 1/3 teaspoons of this product per one (1.0) gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. Apply any time the emerged broadleaf weeds are susceptible.

Spot treatment is defined as a treatment area no greater than 1,000 sq.ft. per acre. The maximum application rate is 0.55 fl.oz. of product per 1,000 sq.ft. per application [0.18 lb MCP-p acid equivalent per acre]. The maximum number of spot treatments is limited to 2 per year with a minimum of 30 days between applications.

CULTURAL TIPS:

Irrigation:

- Do not apply this product through any type of irrigation system.
- Rainfast in as little as 3 hours. Do not apply this product immediately before rainfall or irrigation.
- If possible, do not irrigate or water the turfgrass within 3 to 6 hours after application.
- If dry conditions exist, a scheduled irrigation or watering 24 hours before and 24 hours after application is recommended.

Mowing:

- Delay mowing 2 days before and until 2 days after the application of this product.

BROADLEAF WEEDS CONTROLLED:

EH-1509 Herbicide will control or suppress the following broadleaf weeds and will control or suppress broadleaf weeds that are susceptible to MCPA. Apply any time the emerged broadleaf weeds are susceptible.

BROADLEAF WEEDS			
Aster, white heath & white prairie	Dollarweed (*pennywort)	Lawn burweed	Ragweed
Bedstraw	False dandelion (*spotted catsear & common catsear)	Lespedeza, common	Redweed
Beggarweed, creeping	Field bindweed	Mallow, common	Red sorrel (*sheep sorrel)
Bindweed	(*morningglory & creeping jenny)	Matchweed	Shepherdspurse
Black medic	Field oxeye-daisy	Mouseear chickweed	Spurge
Broadleaf plantain	(*creeping oxeye)	Nutsedge** (yellow)	Thistle
Buckhorn plantain	Filaree, whitestem & redstem	Old world diamond flower	Virginia buttonweed
Bull thistle	Florida betony	Oxalis (*yellow woodsorrel & creeping woodsorrel)	White clover (*Dutch clover, honeysuckle clover, white trefoil, & purplewort)
Burdock, common		Parsley-piert	Wild carrot
Buttercup, creeping		Pennsylvania smartweed	Wild garlic
Carpetweed		Pepperweed	

BROADLEAF WEEDS			
Chickweed, common	Florida pusley	Pigweed	Wild geranium
Chicory	Ground ivy	Pineappleweed	Wild lettuce
Cinquefoil	Groundsel	Plantain	Wild mustard
Clover	Hawkweed	Poison ivy	Wild onion
Curly dock	Healall	Poison oak	Wild strawberry
Dandelion	Henbit	Prickly lettuce (*compass plant)	Yarrow
Dayflower	Innocence (Blue-eyed Mary)	Puncturevine	Yellow rocket
Deadnettle	Knotweed	Purple cudweed	and many more broadleaf weeds
Dock	Lambsquarters	Purslane	
Dogfennel			
*Synonyms			
**Suppression only when nutsedge is young and actively growing.			

Tough weed control in industrial or low maintenance areas:

Mixed stands of Kentucky bluegrass, tall fescue, smooth bromegrass, orchardgrass and reed canarygrass may be treated.

Treatments of EH-1509 Herbicide may injure or kill legumes including clovers (sweet, yellow, red, crimson, alsike, hop, white), lespedezas, trefoils and vetches.

Table 2. Rates of product per acre for specific hard-to-control weeds with ground equipment.			
Weed Types	Troublesome weeds such as:	Amount of product, pints/acre¹	When to Apply
Annual Broadleaf	ivyleaf morningglory, redroot pigweed, cocklebur, sunflower, velvetleaf (butterprint)	1.0 to 1.25 pints/acre	Spring or fall during active growth.
Biennial	Bull thistle, musk thistle, common burdock	1.25 to 1.75 pints/acre	Spring or fall during seedling to rosette stage.
Perennial	Burclover, Canada thistle, field bindweeds, English daisy, hoary cress (whitetop), Veronica (corn speedwell), wild violet.	1.25 to 1.75 pints/acre	Spring or fall during bud to bloom stage.
Footnote 1: Use the lower rate within the range specified for highly favorable plant growing conditions and when broadleaf weeds are less than 6 inches in height. Use the higher rate within the range specified for tall vegetation, dense canopies, weeds beyond the suggested growth stage, or during adverse conditions.			

Biennial and perennial weeds may require follow-up or sequential treatments.

Spray volumes with ground equipment:

- For tank mixtures of EH- 1509 Herbicide, use a minimum spray volume of 20.0 gallons per acre or use the most restrictive of the labeling limitations of all products used in the tank mixture.

ADJUVANTS:

The addition of adjuvants (surfactants, spreaders, spreader-stickers, spray thickeners, foaming agents activators, detergents, and drift reducing agents,) is not necessary when using this product. If the foliar phytotoxicity (leaf burn and necrosis) occurs too quickly, then the translocation of EH-1509 Herbicide will not occur and the level of performance (control) may be reduced in perennial broadleaf weeds. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

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.

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 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 or use of application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS.** Buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

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

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OF HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THE PRODUCT. The Manufacturer must be promptly notified in writing of any claims, whether based in contract, tort, negligence, strict liability, or otherwise, to be eligible to receive either remedy stated above.

The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere. No employee or agent of the manufacturer or seller is authorized to vary or exceed the terms of this LIMITED WARRANTY AND DISCLAIMER in any manner.

APPENDIX

1. Statements which 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:

- Rainfast in as little as 3 hours
- Rainfast [Rainproof] in 3 hours
- [weed option] control in as little as one week
- Proven performance
- Consistently fast control on tough weeds like dandelion, spurge, clover, plantain, ground ivy and [various other listed weeds].
- From the makers of Trimec® herbicides.
- Trimec® is a registered trademark of PBI/Gordon Corporation.
- For information call XXX-XXX-XXXX [contact www.xxx-xxxx.com]

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00971.20231208.amend-proposed-clean.doc

2. Reason for Issue: MCPP-p and MCPA Reg Review + EPA Comments, Registration Review - Sulfentrazone