

2217-977

08/29/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

James L. Kunstman, Ph.D.
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101

AUG 29 2013

Subject: Label Amendment – Add Application Method
EH-1525 Herbicide
EPA Reg. No. 2217-977
Application dated – May 22, 2013

Dear Dr. 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 the 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 released for shipping after eighteen (18) months 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 regarding this letter, please contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)

ACCEPTED

AUG 29 2013

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg No. **2217-977**

EH-1525 HERBICIDE

EPA Reg. No. 2217-977

ACTIVE INGREDIENTS:

Quinclorac	5.50%
Dicamba, dimethylamine salt	0.36%
OTHER INGREDIENTS:	94.14%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 0.464 lb 3,7-dichloro-8-quinolinecarboxylic acid per gallon or 5.50%.
- 0.025 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 0.30%

Note: If the design, format, or small size of the container labels makes it impractical to present the entire ingredient statement on the front panel, then add a referral statement and present this substatement on the back panel: **"See back panel for substatement of ingredient statement"**.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Statements which appear on different label components depending on packaging configuration:

- Referral Statement, e.g., "See next panel for additional Precautionary Statements and First Aid" or "See back panel for Precautionary Statements and Directions for Use (including First Aid, Agricultural Use Requirements, and Storage and Disposal)"
- Net Contents: [1 pint to 1 gallon]
- EPA Est. No. 2217-KS-1 or 2217-KS-2

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.

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 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 by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<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>	

Environmental Hazards

Do not apply to water. Do not contaminate water when disposing of equipment wash waters or rinsate. 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.

[Environmental Hazards (alternate per PRN 2008-1)

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

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.

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 any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until sprays have dried. Not for use on turf being grown for sale or other commercial use such as sod, or for commercial seed production, or for research purposes.

SHAKE WELL BEFORE USING

1. How It Works

EH-1525 Herbicide contains two proven weed killers that target crabgrass and lawn weeds. This herbicide enters the lawn weeds through their leaves and moves throughout the plant to provide control. Lawns listed on this label will not be harmed when used as directed.

2. Where To Use

EH-1525 Herbicide can be applied to residential lawns with the following turfgrass species:

Cool Season Turfgrasses: Kentucky bluegrass, Ryegrass (perennial and annual), Tall fescue, mixtures of cool season grasses containing fine fescues (red, hard and chewings).

Warm Season Turfgrasses: Bermudagrass (common and hybrid), Zoysiagrass, Buffalograss, Seashore paspalum. Applications to Bermudagrass and Seashore Paspalum may cause temporary yellowing or discoloration but full recovery can be expected.

DO NOT apply EH-1525 Herbicide to the following: Bahiagrass, Bentgrass (colonial and creeping), Carpetgrass, Centipedegrass, Dichondra, Gardens (including vegetables, fruit trees, vines and berries), Ornamental plants

(flowers, trees, groundcovers, landscape beds and shrubs), St. Augustinegrass, Turfgrass species that are not listed on this label.

3. Grass And Broadleaf Weeds Controlled

Grass Weeds: Barnyardgrass, Broadleaf Signalgrass, Crabgrass (large and smooth), Foxtail (green, yellow and giant), Kikuyugrass, Torpedograss

Broadleaf Weeds: Annual yellow sweetclover, Black medic, Clover (crimson, hop, red, strawberry, sweet, white), Dandelion, Dollarweed, Speedwell

4. When To Use

Apply this product when crabgrass and other listed grass and broadleaf weeds are actively growing. Do not apply when temperatures are above 90° F.

For newly seeded areas: Apply to newly seeded grasses when well-established (approximately 4 weeks after seedling emergence) or after the third mowing.

For newly sodded, sprigged, or plugged areas: Apply 3 to 4 weeks after the sodding, sprigging, or plugging operations.

5. How Much To Use

Broadcast [Entire area] treatment:

Control option for Barnyardgrass, Broadleaf Signalgrass, Crabgrass (large and smooth), Foxtail (green, yellow and giant) and listed broadleaf weeds: The application rate for this product is [3, 4, or 4.75] fl.oz. of product per 1,000 sq.ft. of lawn. If needed, use 2 applications at the same rate with a 14-day interval for dense populations. The maximum number of applications is limited to 2 per year. The maximum rate is 9.5 fl.oz. of product per 1,000 sq.ft. per year (1.50 lb quinclorac and 0.08 lb dicamba ae per acre per year).

Control option for only Kikuyugrass and Torpedograss: The application rate for this product is 3.0 fl.oz. of product per 1,000 sq.ft. of lawn. If needed, use 3 applications at the same rate with a 14 to 21-day interval for dense populations. The maximum number of applications is limited to 3 per year (season). The maximum seasonal rate is 9.0 fl.oz. of product per 1,000 sq.ft. per year (1.41 lb quinclorac and 0.078 lb dicamba ae per acre per year).

Spot treatment: Dilute 1.5 to 2.375 fl.oz. of product with 1 gallon of water to treat 500 sq.ft. of lawn.

Do not exceed specified use rates, as this is illegal and may cause turf injury.

[Note to reviewer: Language for retail containers NOT fitted with a hose-end sprayer body]

5.1 Hand-Operated Sprayers (Backpack, Knapsack, Tank-Type or Pump-Up)

Measure and mix the proper amount of product with water. Adjust the nozzle to deliver coarse spray droplets. Spray evenly over the lawn. Spray coverage should be uniform and complete.

[Optional Rate Description Tables. May be abbreviated for retail container size.]

Mixing for the 3 fl.oz. per 1,000 sq.ft. rate		
Amount of Product to Use	Amount of Water in Sprayer	Approximate Treated Area
1.5 fl.oz.	1 gallon	500 sq.ft.
3.0 fl.oz.	2 gallons	1,000 sq.ft.
4.5 fl.oz.	3 gallons	1,500 sq.ft.
9.0 fl.oz.	6 gallons	3,000 sq.ft.
15 fl.oz.	10 gallons	5,000 sq.ft.

Equal measures: 3 fl.oz. = 6 Tablespoons. 1 cup = 8 fl.oz. = 1/2 pint.

Mixing for the 4.75 fl.oz. per 1,000 sq.ft. rate		
Amount of Product to Use	Amount of Water in Sprayer	Approximate Treated Area
2.375 fl.oz.	1 gal	500 sq.ft.
4.75 fl.oz.	2 gal	1000 sq.ft.
7.125 fl.oz.	3 gal	1500 sq.ft.
14.25 fl.oz.	6 gal	3000 sq.ft.

Equal measures: 3 fl.oz. = 6 Tablespoons. 1 cup = 8 fl.oz. = 1/2 pint.

[Note to reviewer: Language for retail containers NOT fitted with a hose-end sprayer body]

5.2 Entire Lawn Treatments With Dial Type Hose-End Sprayers

Three Easy Steps To Mix And Apply:

1. FILL

- Determine (Measure) the total lawn area to be sprayed. For rectangular areas, multiply the length by the width to obtain total square feet.
- The application rate for this product is [3, 4, 4.75] fl.oz. of product per 1,000 sq.ft. of lawn. Add an adequate amount of herbicide to the spray bottle to treat the total lawn area, or add [3, 4, 4.75] fl.oz. of product for every 1,000 sq.ft. of lawn area.
- Do not add water to the sprayer jar.

2. SET THE DIAL

The dial setting or rate per gallon for this product is XX oz. of product per gallon of water. Set the dial to the rate per gallon and keep the dial set to this setting while spraying.

Types of hose-end sprayers	Dial setting for dosage rates		
	3.0 fl.oz./1000 sq.ft.	4.0 fl.oz./1000 sq.ft.	4.75 fl.oz./1000 sq.ft.
Ortho® Dial'N Spray® Hose-End Sprayer	1.5 oz.	2.0 oz	2.5 oz
Hudson® Hose End Liquid Concentrate Sprayer	1.5 oz.	2.0 oz	2.5 oz
Gilmour® Dial-A-Mix® Lawn and Garden Sprayer	3 tablespoons	4 tablespoons	5 tablespoons

3. SPRAY - Apply evenly over the lawn.

[Note to reviewer: Language for retail containers fitted with a hose-end sprayer body]

5.3 Entire Lawn Treatments With Ready-To-Spray Hose-End Sprayers

This product is packaged as a ready-to-spray product with no mixing. The container is fitted with a sprayer body that delivers spray droplets at a fixed rate.

This container will cover the treated areas described when applied at 3 to 4.75 fl.oz.per 1,000 sq.ft. Refer to view strip [graduated scale] on side of container to guide coverage.

[This quart sprayer bottle will treat 10,000 sq.ft. of turfgrass when applied at 3.2 fl.oz. of product/1,000 sq.ft. [Note to reviewer: This statement may be adjusted to account for different container sizes and/or rates.]]

[Optional table]

Rate	Square Feet Covered by Container Size	
	1 pt hose-end sprayer container	1 qt hose-end sprayer container
3.0 fl.oz./1000 sq.ft.	5,333 sq.ft.	10,667 sq.ft.
4.0 fl.oz./1000 sq.ft.	4,000 sq.ft.	8,000 sq.ft.
4.75 fl.oz./1000 sq.ft.	3,368 sq.ft.	6,737 sq.ft.

Four Easy Steps To Apply:

1. Determine [Measure] the total lawn area to be sprayed. For rectangular areas, multiply the length by the width to obtain total square feet.
2. **CONNECT:** Remove bottle cap and screw the spray nozzle onto the bottle. Attach [connect] garden hose to spray nozzle. Turn [rotate] the spray nozzle lever to the "OFF" position.
3. **SPRAY:** Turn on water at faucet. Extend hose to the farthest area of lawn [turf] to be treated. To begin spraying, turn [rotate] the spray nozzle lever to the "SPRAY" position. The herbicide mixes automatically with the water. Walk at a steady pace while spraying evenly and working towards the faucet.
4. **FINISH:** To stop spraying, turn [rotate] spray nozzle lever to the "OFF" position. Turn off water at faucet. To relieve pressure, turn [rotate] spray nozzle to the "ON" position and point sprayer away from any desirable plants before disconnecting the sprayer nozzle from the garden hose.

[Optional Ready-To-Spray Hose-End Sprayer for applicable packaging]

[hose-end ready spray graphic]

1. Make sure the handle is in the upright position and locked OFF position. Shake container well and attach spray nozzle to hose.
2. Turn water on at faucet, aim nozzle toward lawn, bend tab back, and rotate handle clockwise towards the hose connection in the ON position to begin spraying. The product will automatically siphon and mix with water.
3. When finished turn the handle counterclockwise until the handle is in the upright position and locked position. Turn faucet off. Discharge residual water pressure by turning the handle ON and OFF again. Unscrew spray nozzle from hose.

5.4 [Spray Delivery System Name]

[When Packaged Accordingly:]
Battery Operated [Powered] Sprayer

SPRAYER: USE DIRECTIONS

The [Spray Delivery System Name] is a [patent pending] [patented] innovative home lawn, landscape, and perimeter tank spray system. Spot treat weeds with this easy to use system.

1. Unscrew the tank cap and fill the tank with water up to the one gallon indicator. [The tank holds one gallon of water.]
2. Remove the [sprayer][wand][applicator] from the tank holster and unfold the [sprayer] [wand] [applicator].
3. Select the [cartridge] [bottle] [pesticide] [herbicide] labeled for intended use. **READ THE ENTIRE PRODUCT LABEL PRIOR TO USE.**
4. Remove the cap from the [cartridge] [bottle] [herbicide]. [Each [cartridge] [bottle] contains 4 oz. of [product] [liquid].] [Each 4 oz. [cartridge] [bottle] of concentrate makes one gallon of [liquid] [ready to use] spray.]

5. Insert the [cartridge] [bottle] [pesticide] [herbicide] into the top of the sprayer and twist until tight.
6. Press the trigger to spot spray [weeds] as listed on the product label.
7. When finished spot treating remove the [cartridge] [bottle] [pesticide] [herbicide]. Replace the cap on the [cartridge] [bottle] [pesticide] [herbicide]. Follow label Storage and Disposal instructions for product [pesticide] [herbicide] [cartridge] [bottle].
8. After spot spraying rinse the [sprayer] [wand] [applicator] according to the RINSE: USE DIRECTIONS.

RINSE: USE DIRECTIONS

1. Remove the [cartridge] [bottle] [pesticide] [herbicide]. Ensure that there is water in the one gallon tank.
2. Press and hold the [trigger] [sprayer] for 10 seconds to flush the [sprayer] [wand] [applicator] with clean water from the tank.

CHANGE [CARTRIDGE] [BOTTLE]: USE DIRECTIONS

1. Remove the [cartridge] [bottle] [herbicide] currently loaded in the [Spray Delivery System Name].
2. Follow label Storage and Disposal instructions for product [pesticide] [herbicide] [cartridge] [bottle].
3. Press and hold the [trigger][sprayer] for 10 seconds to flush the [sprayer] [wand] [applicator] with clean water from the tank.
4. Select a new [cartridge] [bottle] [pesticide] [herbicide] labeled for intended use. READ THE ENTIRE PRODUCT LABEL PRIOR TO USE.
5. Insert the [cartridge] [bottle] [pesticide] [herbicide] into the top of the sprayer and twist until tight.
6. Press the trigger to spot spray [weeds] as listed on the product label.
7. When finished spot treating remove the [cartridge] [bottle] [pesticide] [herbicide]. Replace the cap on the [cartridge] [bottle] [pesticide] [herbicide]. Follow label Storage and Disposal instructions for product [pesticide] [herbicide] [cartridge] [bottle].
8. After spot spraying, rinse the [sprayer] [wand] [applicator] according to the RINSE USE DIRECTIONS. Store the [Spray Delivery System Name] OR RINSE and change [cartridge] [bottle].

NOTE: IF OUTPUT SPRAY IS DIMINISHED OR SPUTTERING, DO THE FOLLOWING:

1. Check that there is water remaining in the one gallon tank. If not, refill the tank with water.
2. Check that there is liquid remaining in the [cartridge] [bottle]. If not, change to a new [cartridge] [bottle].

[Two [cartridges] [bottles] can be stored on the back of the [Spray Delivery System Name]] .

[[Optional:]CHANGING BATTERIES:]

If sprayer does not operate or spray performance declines significantly, change the four AA alkaline batteries in the sprayer handle as follows:

1. Remove the [cartridge] [bottle].
2. Slide the battery cover open in the underside of sprayer handle.
3. Allow battery cover to swing open.
4. Remove old batteries.
5. Replace with four AA alkaline batteries. Make sure the positive and negative ends match the direction indicated on the inside of the battery door.
6. Close battery door and slide the door until latch is closed.

6. Cultural Tips And Notes

Seeding: The treated area can be seeded at 7 days after the application of this product.

Irrigation:

- Non-stressed turfgrass: Adequate soil moisture and favorable growing conditions enhance the performance of this product.
- Stress from high temperatures, drought, insects or diseases: Avoid applications of this product when turfgrasses are under stress since injury may result. If dry conditions exist, schedule irrigations

(watering) before and after the application. For best results, delay the irrigation until approximately 24 hours after application of this product.

Mowing: Delay mowing 2 days before and until 2 days after the application of this product. Do not use clippings from the treated areas as mulch or compost around flowers, ornamentals, trees, or in vegetable gardens.

Nontarget plants: Do not apply this product to food crops (gardens, fruits and vegetables), forage crops, or ornamental plants including flowers, trees, shrubs, hedges, woody ornamentals, groundcovers established in landscape plantings and other nontarget plants. Do not spray exposed roots of ornamentals and trees.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

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

LIMITED WARRANTY AND DISCLAIMER

FOR USE ONLY AS DIRECTED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

APPENDIX

1. Advertising claims that may be presented on the retail containers of supplemental registrants.

- One quart covers up to XXXX square feet.
- 1 quart treats [up to] 10,700 sq.ft. [Note to reviewer: This statement may be adjusted to account for different container sizes and/or rates.]
- Covers [XXXX] sq.ft.
- Keep from freezing.
- Controls crabgrass, certain grass weeds, and many other broadleaf lawn weeds including those shown on the side panel.
- Controls crabgrass and broadleaf weeds in lawns
- Kills the root.
- Water based.
- Won't harm lawn grass when used according to label directions.
- Kills crabgrass and lawn weeds
- Kills the weeds not the lawn

- Proven performance
- For home lawn care
- Won't harm lawn grass when used as directed.
- Mixes with Water - Concentrate
- Kill crabgrass & [any listed weed(s)] too!
- Kills Lawn Weeds plus Crabgrass in One Step
- Kills crabgrass and other lawn weeds in one easy step
- Kills Crabgrass plus Broadleaf Weeds
- Kills Listed Weeds
- Systemic [Herbicide] [Activity]
- Kills Both Grass and Broadleaf Weeds
- Kills both Crabgrass & Broadleaf weeds
- Proprietary Formula that Kills Both Crabgrass and Broadleaf Weeds
- Effectively Kills Both Certain Weed Grasses and Broadleaf Weeds
- Local Solutions for Local Problems
- Convenient [Simple] [Design]
- Simple [and easy] [to use]
- Kills & prevents tough weeds
- Visible results in hours
- Contains XXX cartridges
- Can be used on warm & cool season grasses
- For use on Bermudagrass, Kentucky Bluegrass, Tall Fescue and other listed [turf] grasses
- Rainproof in 1 hour
- Rainproof in hours
- Kills tough lawn weeds
- Each 4 oz cartridge makes 1 gallon of spray

Product Facts

What It Does: Kills crabgrass and other troublesome grass weeds and broadleaves as well. (See inside for complete list)

Where to Use: Lawns: Kills the weeds not the lawn when used as directed. (icon weeds)

When to Use: Apply when daytime temperatures are below 90°F.

Questions & Comments: (icon phone)

Call 1-800-xxx-xxxx

2. Trademark acknowledgements

- Ortho® Dial'N Spray® Hose-End Sprayer is a registered trademark of The ORTHO Group.
- Hudson® Hose End Liquid Concentrate Sprayer is a registered trademark of the H.D. Hudson Manufacturing Company.
- Gilmour® Dial-A -Mix® Lawn and Garden Sprayer is a registered trademark of the Gilmour Manufacturing Company.
- Trimec® is registered trademark of PBI/Gordon Corporation

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00977.20130820.amend-proposed-clean.doc

2. Reason for Issue: EPA Comments #1