

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 18, 2018

Eric D. Smith Federal Registration Manager PBI/Gordon Corporation P.O. Box 014090 Kansas City, MO 64101

Subject: Label Amendment – Modifying the turf grass advisory statement, replacing the

temperature related mandatory statement, and other minor changes

Product Name: EH-1552 Herbicide EPA Registration Number: 2217-996

Application Date: 11/14/2016 Decision Number: 523904

Dear Mr Smith:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 2217-996 Decision No. 523904

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Nathan Mellor by phone at 703-347-8562, or via email at mellor.nathan@epa.gov.

Sincerely,

Kathryn Montague, Product Manager 23

Herbicide Branch

Registration Division (7505P) Office of Pesticide Programs

Enclosure

ACCEPTED 09/18/2018 Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the

pesticide registered under EPA Reg. No. 2217-996

PENOXSULAM	GROUP	2	HERBICIDE
2,4-D DICAMBA	GROUP	4	HERBICIDE
SULFENTRAZONE	GROUP	14	HERBICIDE

EH-1552 HERBICIDE

EPA Reg. No. 2217-996

Alternate Brand Names: Avenue South Broadleaf Herbicide for Turfgrass

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

KEEP FROM FREEZING

ACTIVE INGREDIENTS:

2,4-D, dimethylamine salt	7.28%
Dicamba, dimethylamine salt	
Penoxsulam	0.70%
Sulfentrazone	0.70%
OTHER INGREDIENTS:	89.26%
TOTAL	

THIS PRODUCT CONTAINS:

- 0.061 lb Penoxsulam per gallon or 0.70%
- 0.061 lb Sulfentrazone per gallon or 0.70%
- 0.530 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 6.05%.
- 0.150 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 1.71%.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

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

Net Contents:	
EPA Est. No.	

Company Name and Address:

PBI/Gordon Corporation 1217 West 12th Street Kansas City, Missouri 64101



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin 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)

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

- · long-sleeved shirt and long pants,
- · shoes and socks,
- chemical-resistant gloves, made of barrier laminate, butyl rubber (≥ 14 mils), nitrile rubber (≥ 14 mils), neoprene rubber (≥ 14 mils), polyvinyl chloride (PVC, ≥ 14 mils), or viton (≥ 14 mils), and
- chemical resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

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.

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. 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 swallowed:	 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or on clothing:	 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.
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.

Environmental Hazards

This pesticide is 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.

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

DIRECTIONS FOR USE

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

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

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 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, including 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 (≥ 14 mils), nitrile rubber (≥ 14 mils), neoprene rubber (≥ 14 mils), polyvinyl chloride (PVC, ≥ 14 mils), or viton (≥ 14 mils), and
- 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.

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

1. Product Description

Designed for turfgrass applications, EH-1552 Herbicide contains four active ingredients. These combined herbicides provide limited residual activity. Weeds are controlled by affecting multiple sites within the broadleaf weeds. The symptoms of susceptible broadleaf weeds include leaf and stem curl or twisting and weed yellowing.

EH-1552 Herbicide offers these advantages:

- Excellent postemergent activity with proven performance for broadleaf weed control in turfgrass.
- High selectivity (turfgrass safety) in established warm-season turfgrass and cool-season turfgrass.
- The combination of these four active ingredients provides effective weed control for common and troublesome weed species in turfgrass, including dollarweed (pennywort), [any listed weed species] and [any listed weed species].
- Generally, the weed injury symptoms can be noticed within a few days of the application and weed death can occur within 14 to 28 days.

2. Resistance Management

For resistance management, this product contains Group 2, 4 and Group 14 herbicides. Any weed population may contain or develop plants naturally resistant to this product and other Group 2, 4 or 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 2, 4 or 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 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 resistancemanagement 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.

3. Spray Preparation and Tank Mixtures

EH-1552 Herbicide is a water-based formulation intended for dilution with water. In certain applications, liquid fertilizer may replace part of the water as a diluent.

Mixing with water:

Add one-half the required amount of water to the spray tank, then add EH-1520 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.

Mixing with liquid fertilizers:

Use suitable sources and rates of fertilizer based upon guidance of your fertilizer supplier or State Extension Service Specialist.

Verify physical compatibility with a 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 must not be prepared as a tank mixture.

Liquid fertilizers are either solutions (true fluids) or suspensions. Physical compatibility of this product is adequate with liquid nitrogen solutions. Mixing this product with suspensions or N-P-K solutions may not be satisfactory (may be marginal) without pre-mixing this product with water. Premxing this product with 2 parts water will ensure that the emulsifiers are activated enabling the herbicide to be suspended in the fertilizer.

Adjuvants and spray additives:

Adjuvants (including 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-1520 Herbicide would not be advised. Do not use adjuvants and spray additive tank-mix combinations, unless your experience indicates that the tank mixture will not result in turf injury.

Mixing with other pesticides:

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions, limitations, and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

4. 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. For best spray distribution and coverage, select a spray volume and delivery system that will ensure accurate and uniform coverage. Boom sprayers equipped with appropriate nozzles, and screens are suitable for broadcast applications.

This product may cause injury to susceptible/nontarget 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, 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.

Use spray volumes of 3 to 175 gallons per acre **with** spray pressures adjusted to 20 to 40 psi (Except when applying this product to St. Augustinegrass, use spray volumes of 40 to 175 gallons per acre). Do not apply with high-pressure equipment. Use higher spray volumes for dense weed populations.

- Calibration and proper application are essential when using this product.
- Avoid spray overlaps with spray equipment
- Over-application or rates above those on this labeling can cause turf injury.

 Hand-held technique: Do not wave spray wands fitted with flat fan nozzles in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead, hold the flat fan nozzle stationary at the proper height. Side-to-side motion results in uneven coverage. To avoid excessive spray pattern overlaps, a spray colorant may be used.

Hand operated sprayers including backpack sprayers, compression sprayers, and knapsack sprayers are appropriate for small turfgrass areas.

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.

5. Spray Drift Management For Ornamental Turfgrass Sites

It is the responsibility of the applicator to avoid spray drift at the application site. Do not allow the herbicide solution to mist, drip, drift, or splash from treated areas onto desirable broadleaf plants as small amounts of this product can damage sensitive plants near the treated area. If desirable plants are accidentally sprayed, immediately rinsing leaves with water may reduce or eliminate plant damage.

For Non-Cropland Sites

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of ground application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

When applying sprays that contain 2,4-D as the sole active ingredient, or when applying sprays that contain 2,4-D mixed with active ingredients that require a Coarse or coarser spray, apply only as a Coarse or coarser spray (ASAE standard 572) or a volume mean diameter of 385 microns or greater for spinning atomizer nozzles.

When applying sprays that contain 2,4-D mixed with other active ingredients that require a Medium or more fine spray, apply only as a Medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors ontarget deposition and there are not sensitive areas (including, but not limited to, bodies of water, known habitat for nontarget species, nontarget crops) within 250 feet downwind. If applying a Medium spray, leave one swath unsprayed at the downwind edge of the treated field.

Temperature Inversions

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

Susceptible Plants

Do not apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides. Where states have more stringent regulations, they must be observed.

Equipment

All ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates. Additional requirements for ground boom application: Do not apply with a nozzle height greater than 4 feet above the turf canopy.

6. Where To Use

This product provides broadleaf control in the following sites.

- Turfgrass (ornamental) 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 (turf) 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, athletic fields, golf courses (fairways and roughs), and office buildings.
- Non-cropland sites: including farmyards, fencerows or fence lines, highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadsides, roadside ditches, road shoulders, road embankments, dividers, and medians; industrial sites: lumberyards, tank farms, fuel or equipment storage areas; municipal, state, and federal lands: airports and military installations; railroad rights-of-ways, railroad yards, railroad crossings and railroad bridge abutments; utility rights-of-way: telephone, pipeline, electrical powerlines, and communication transmission lines.
- Agricultural site: Commercial sod production

Site Restrictions:

- Do not apply to any body of water including 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.

Turfgrass tolerance:

 Established turfgrasses listed on this label are tolerant to applications of Avenue South but may be susceptible to temporary yellowing or discoloration when applications are made during extreme temperatures or when turf is under stress. If injury occurs, turf will resume normal growth after mowing.

Use Restrictions:

- Do not apply this product to greens, collars, tees, bentgrass, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.
- Do not collect grass clippings for use as mulch around plants.
- For ground application only; aerial applications are not permitted.
- Do not allow livestock to graze on any areas treated with this product.
- Do not broadcast apply to bare ground or paved surfaces.

Irrigation:

• Do not apply this product through any type of irrigation system.

• Rainfast in as little as 4 hours. Do not apply this product immediately before rainfall or irrigation. Do not irrigate or water the turfgrass within 3 hours after application. If dry conditions exist, irrigate at least 8 hours before and 8 hours after application.

State Restrictions:

- **New York:** Only one application per year of this product is allowed. This product is not allowed to be sold, distributed or used in Nassau or Suffolk Counties.
- California: Make broadcast applications only between March 1 and September 1. If troublesome weeds appear during other times of the year, a spot application can be made. While irrigation is necessary and important for plant growth, apply irrigation water efficiently so that no more than 125% of the net irrigation requirement is applied for any irrigation event. Apply efficient irrigations for six months following application of sulfentrazone containing products. Do not apply product to bare ground.
- **Arizona**: Do not use this product on sod farms in Arizona.
- Use of this product in certain portions of California, Oregon and Washington is subject to the January 22, 2004 Order for injunctive relief in *Washington Toxics Coalition. et al. v. EPA*, C01-0132C, (W.D. WA). For further information, please refer to EPA Web Site: http://www.epa.gov/espp.

8. 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.

Restrictions

- Do not apply more than 2 broadcast treatments per year.
- A minimum of 30 days is required between applications for turf and non-cropland sites and a minimum of 21 days for sod farms.
- Maximum rate per application is 6 pints/acre [0.40 lb 2,4-D ae/acre, 0.046 lb penoxsulam/acre, 0.11 lb dicamba ae/acre, and 0.046 lb sulfentrazone/acre].
- Maximum rate per year is 12 pints/acre [0.80 lb 2,4-D ae/acre, 0.092 lb penoxsulam/acre, 0.22 lb dicamba ae/acre, and 0.092 lb sulfentrazone/acre]. Do not exceed the maximum annual rate of 12 pints per acre per year, excluding spot treatments.

Use rates and spray volumes of EH-1552 Herbicide as broadcast treatments for use on turfgrass are presented in Tables 1, 2, and 3.

Table 1. Rates for St. Augustinegrass on Sod Farms and Ornamental Lawns and Turfgrass.			
Species	Amount of Product	Spray Volume	
St. Augustinegrass (improved varieties including 'Floratam' and 'Bitterblue')	Sensitive or Susceptible Weeds 3.0 to 3.5 pints/acre (1.1 to 1.3 fl.oz./1000 sq.ft.)	40 to 175 gallons/acre (1 to 4 gallons per 1000 sq.ft.)	
	Hard-To-Control Weeds 3.5 to 5.0 pints/acre (1.3 to 1.8 fl.oz./1000 sq.ft.)		
St. Augustinegrass (common varieties)	Sensitive or Susceptible Weeds 3.5 to 4.0 pints/acre (1.3 to 1.5 fl.oz./1000 sq.ft.)	40 to 175 gallons/acre (1 to 4 gallons per 1000 sq.ft.)	
	Hard-To-Control Weeds 4.0 to 5.0 pints/acre (1.5 to 1.8 fl.oz./1000 sq.ft.)		

Precaution: Do not apply this product to improved varieties of St. Augustinegrass at rates above 3.5 pints/acre unless temporary turf injury can be tolerated. Turf injury symptoms may include discoloration, thinning, and stunting.

Restriction: Do not broadcast apply this product to St. Augustinegrass when ambient temperatures are below 50°F. Do not spot spray this product to St. Augustinegrass if temperatures are expected to drop below 40°F within 10 days of application. Do not apply this product to St. Augustinegrass during the fall to winter transition.

Table 2. Rates for Warm-Season Turfgrasses (except St. Augustinegrass) on Sod Farms and Ornamental Lawns and Turfgrass.

Species	Amount of Product	Spray Volume	
Warm-season Turf	·	·	
Hybrid bermudagrass Bahiagrass Zoysiagrass Buffalograss Centipedegrass Seashore paspalum Kikuyugrass	3.5 to 4.5 Pints/acre (1.3 to 1.7 fl.oz. 1000 sq.ft.)	3 to 175 gallons/acre (0.1 to 4 gallons per 1000 sq.ft.)	
Common bermudagrass	4.0 to 5.0 Pints/acre (1.5 to 1.8 fl.oz./1000 sq.ft.)	3 to 175 gallons/acre (0.1 to 5 gallons per 1000 sq.ft.)	

Dormant turf: This product may be applied to dormant bermudagrass, dormant zoysiagrass, and dormant bahiagrass.

Use caution when applying this product to warm-season turfgrass during spring green-up or in the fall during the transition period between active growth and dormancy.

Tank mixing with metsulfuron-methyl may increase the spectrum of weeds controlled when treating St. Augustinegrass, hybrid Bermudagrass, common Bermudagrass, zoysiagrass, buffalograss, and centipedegrass. The suggested metsulfuron-methyl rate is 0.009 lb Al to 0.019 lb Al/acre. For example, a 60% WDG metsulfuron-methyl product could be used at 0.25 to 0.50 oz/acre. Use only at the application rates and on the turf species listed on the labels of both products.

Fable 3. Rates for Cool-Season Turfgrasses on Sod Farms and Ornamental Lawns and Turfgrass. Species Amount of Product Spray Volume			
Species	Amount of Product	Spray Volume	
Cool-season Turf			
Kentucky bluegrass,	4.0 to 6.0 Pints/acre	3 to 175 gallons/acre	
Annual bluegrass	(1.5 to 2.2 fl.oz./1000 sq.ft.)	(0.1 to 4 gallons per 1000 sq.ft.)	
Perennial ryegrass,	2.7 to 5.0 Pints/acre	3 to 175 gallons/acre	
Annual ryegrass,	(1.0 to 1.8 fl.oz./1000 sq.ft.)	(0.1 to 4 gallons per 1000 sq.ft.)	
Tall fescue,			
Red or fine leaf fescues			

Precaution: Do not apply above 2.7 pints/acre on fescue or ryegrass varieties unless temporary turf injury can be tolerated.

If treating Kentucky bluegrass or annual bluegrass in a mixed stand with perennial ryegrass, annual ryegrass, tall fescue, or red/fine leaf fescues, use 2.7 pints/acre (0.021 lb penoxsulam/acre) unless temporary injury to the sensitive species can be tolerated.

NOTE: 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.

• It is impossible to test all environmental conditions for the listed turfgrass. Use this product on a small area and observe for 30 days to determine the acceptability of possible turf discoloration or injury.

- If any discoloration is objectionable or any level of phytotoxicity would be unacceptable, then do not add surfactants and other adjuvant(s) combined with EH-1552 Herbicide. Do not use tank mixture combinations; unless your experience indicates that the tank mixture will not result in turf injury.
- Over application of this product can cause turf injury (discoloration, turf thinning, stunting and even turf death).
- Avoid fall or winter applications unless turf stunting can be tolerated.
- Not all turf varieties have been tested. Users who wish to use EH-1552 Herbicide on turfgrass species not listed on this label may determine the suitability for use by treating a small area at a rate specified for other turfgrass species. Prior to treatment of larger areas, observe the treated area for any sign of herbicidal injury during 30 days of normal growing conditions to determine if the target turfgrass species is tolerant. The user assumes responsibility for any plant damage or other liability resulting from use of EH-1552 Herbicide on turfgrass species not listed on this label.

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

- Apply when 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 on this labeling including excessive overlaps of this product can cause turf injury.
- Hand-held techniques: Do not wave wands fitted with flat fan nozzle tips in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead, hold the flat fan nozzle stationary at the proper height. Side-to-side motions result in uneven coverage. To avoid excessive spray pattern overlaps, a spray colorant may be used.
- For St. Augustinegrass (improved varieties including 'Floratam' and 'Bitterblue')
 - For listed Sensitive or Susceptible Weeds, mix 1.1 to 1.3 fl. oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 1 for specific directions.
 - For listed Hard-To-Control Weeds, mix 1.3 to 1.8 fl. oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 1 for specific directions.
- For St. Augustinegrass (common varieties)
 - For listed Sensitive or Susceptible Weeds, mix 1.3 to 1.5 fl.oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 1 for specific directions.
 - For listed Hard-To-Control Weeds, mix 1.5 to 1.8 fl.oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 1 for specific directions.
- For warm season turfgrasses, mix 1.3 to 1.7 fl.oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 2 for specific directions.
- For Kentucky bluegrass and annual bluegrass, mix 1.5 to 2.2 fl.oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 3 for specific directions.
- For ryegrasses and fescues, mix 1.0 to 1.8 fl.oz. of this product per 1 gallon of water for treatment of approximately 1,000 sq.ft of turfgrass. See Table 3 for specific directions.
- Do not use tank mixture combinations, unless your experience indicates that the tank mixture is
 effective and will not result in turf injury. Do not exceed label dosage rate. Follow the labeling of each
 companion product for precautionary statements, directions for use, dosage rates, and application
 schedules. Tank mixture directions are for use only in states where the companion products and
 application site are registered.

CULTURAL TIPS FOR IMPROVED CONTROL:

Mowing: Delay mowing 2 days before and until 2 days after the application of this product. **Irrigation:** If dry conditions exist, irrigate at least 8 hours before and 8 hours after application. **Temperatures:** Weed control is more effective when air temperatures are above 55°F, with adequate soil temperature and moisture, and when target weeds are actively growing.

9. Broadleaf Weeds Controlled

This product will control or suppress the following broadleaf weeds. Apply when the emerged broadleaf weeds are susceptible.

BROADLEAF WEEDS			
Aster, white heath & white	Dayflower	Knotweed	
prairie	Deadnettle	Lambsquarters	Sheep sorrel
Bedstraw	Dock	Lawn burweed	Shepherd's purse
Beggarweed, creeping	Dogfennel	Lespedeza, common	Spurge
Beggarweed, dwarf	Dollarweed (*pennywort)	Mallow, common	Smartweed
Bindweed	Doveweed**	Matchweed	Spurweed
Black medic	English daisy	Mouseear chickweed	Thistle
Bull thistle	False dandelion (*spotted	Nutsedge (yellow) ***	Veronica** (*corn
Burclover	catsear & common	Old world diamond flower	speedwell)
Burdock, common	catsear)	Oxalis** (*yellow woodsorrel	Vetch, common
Buttercup, creeping	Field bindweed	& creeping woodsorrel)	Virginia buttonweed**
Carpetweed	(*morningglory & creeping	Parsley-piert	Virginia pepperweed
Catsear, spotted	jenny)	Pennsylvania smartweed	White clover (*Dutch clover,
Chamberbitter**	Field oxeye-daisy	Pepperweed	honeysuckle clover, white
Chickweed, common	(*creeping oxeye)	Pigweed	trefoil, & purplewort)
Chickweed, mouseear	Filaree, whitestem &	Pineappleweed	Wild carrot
Chicory	redstem	Plantain, buckhorn**	Wild garlic
Cinquefoil	Florida betony (rattlesnake	Plaintain, common**	Wild geranium
Clover	weed)	Poison ivy	Wild lettuce
Clover, hop	Florida pusley	Poison oak	Wild mustard
Clover, red	Goldenrod	Puncturevine	Wild onion
Clover, white	Ground ivy**	Purple cudweed**	Wild strawberry
Cocklebur	Groundsel	Purslane	Wild violet**
Coffeeweed	Hawkweed	Ragweed	Woodsorrel, creeping
Compassplant	Healall	Redweed	Woodsorrel, yellow
Curly dock	Henbit	Red sorrel (*sheep sorrel)	Yarrow
Dandelion	Innocence (Blue-eyed	Roundleaf mallow	Yellow rocket
	Mary)		

^{*} Synonyms

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: 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

^{**} Hard-to-control weeds. May require higher use rates and/or a second application within the rate range listed.

^{***} Suppression only when nutsedge is young and actively growing.

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.

<u>LIMITED WARRANTY AND DISCLAIMER</u>

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 including weather, presence of other materials, or the manner of use or application,

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

The manufacturer warrants only that this product conforms to the chemical description given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use, subject to the inherent risks described below. 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.

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

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

APPENDIX

- 1. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials: Herbicide Benefit Claims:
 - Visible results in just a few days
 - Visible results in days
 - [Weed] control in as little as two [2] weeks
 - Consistent control on tough listed weeds like dollarweed, and [various other listed weeds].
 - [product name] provides rapid and effective control of listed weeds including dollarweed, white clover, dandelion and spurge in turfgrass.
 - High selectivity (turfgrass safety) in established St. Augustinegrass
 - Turfgrasses include: St. Augustinegrass, common bermudagrass, hybrid bermudagrass, bahiagrass, zoysiagrass, buffalograss, centipedegrass, seashore paspalum, kikuyugrass [and most cool-season turfgrasses as listed.]
 - Sites include home lawns, golf courses, sod farms, roadsides and many other listed turf sites.
 - Advanced broadleaf weed control [chemistry]
 - Post-emergent broadleaf weed control High turfgrass safety in established St. Augustinegrass (including 'Floratam') and other southern turfgrass species when used as directed.
 - For use on: St. Augustinegrass (including 'Floratam'), bermudagrass, zoysiagrass, centipedegrass, buffalograss and seashore paspalum
 - Will not harm 'Floratam' St. Augustinegrass when used as directed
 - · Controls some of the toughest weeds in warm-season turfgrass
 - Provides rapid and effective weed control
 - 4 active ingredients

General Marketing Claims:

- Rainfast in [as little as] 6 hours
- Rainfast [Rainproof] in 6 hours
- Reseed in 3 to 4 weeks
- www.pbigordon.com
- See weedalert.com
- CAUTION signal word
- Low-odor formula [formulation]
- Water Based
- IMPORTANT: KEEP FROM FREEZING
- [Shake well before using]
- From the makers of Trimec® herbicides.
- TRIMEC® is a registered trademark of PBI/Gordon Corporation
- ® Checkered Flag/Label Design is a registered trademark of PBI/Gordon Corporation.
- SpeedZone® and TRIMEC® are registered trademarks of PBI/Gordon Corporation.
- [Various photographs of weeds listed on this label]

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00996.20180912.amend-proposed-clean

2. Reason for Issue: EPA Comments #2

Internal Usage Notes

Associated Container Label: Avenue South Broadleaf Herbicide for Turfgrass